

II. Responses to Comments

II. Responses to Comments

A. Introduction

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

Topical responses have been prepared to address commonly raised topics. These topical responses are provided in Section II.C, Topical Responses, of this section of the Final EIR and include the following:

Topical Response No. 1: Clearly Defined Project Description and Specific Plan

Topical Response No. 2: Definition of Floor Area is Appropriate

Topical Response No. 3: Permitted On-Site Uses

Topical Response No. 4: Appropriateness of Economic Objective

Topical Response No. 5: Historical Resources

Topical Response No. 6: Wilshire Community Plan Update

Topical Response No. 7: Mobility Hub

Topical Response No. 8: Vehicle Miles Traveled

Topical Response No. 9: Neighborhood Traffic Management Plan

Topical Response No. 10: Trip Generation

Topical Response No. 11: Transportation Demand Management

Topical Response No. 12: Safety and Congestion

Topical Response No. 13: Parking

Topical Response No. 14: Construction Vehicle Impacts

Topical Response No. 15: Transportation Improvement Program

Topical Response No. 16: Project Alternatives Analysis

Section II.D, Responses to Comments, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1.

II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1

Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
1	Sam Wang Program Supervisor, CEQA-IGR Planning, Rule Development & Implementation SCAQMD 21865 Copley Dr. Diamond Bar, CA 91765-4178			X																						
2	Charles C. Holloway Utility Services Manager Environmental Planning and Assessment Department of Water and Power 111 N. Hope St., Rm. 1044 Los Angeles, CA 90012-2607																					X			X	
3	Rowena Lau Division Manager Wastewater Engineering Services Division LA Sanitation and Environment 2714 Media Center Dr. Los Angeles, CA 90065-1733	X									X														X	
4	Michael Gralapp President A & G Lumber Company 5942 Washington Blvd. Culver City, CA 90232-7325																									X
5	Beverly Fairfax Community Alliance info@beverlyfairfaxcommunityalliance.org	X				X							X	X						X					X	

Table II-1 (Continued)
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6	Brissa Sotelo-Vargas BizFed Chair Los Angeles County Business Federation 6055 E. Washington Blvd., Ste. 1005 Commerce, CA 90040-2439 David Fleming BizFed Founding Chair Los Angeles County Business Federation 6055 E. Washington Blvd., Ste. 1005 Commerce, CA 90040-2439 Tracy Hernandez BizFed Founding CEO Los Angeles County Business Federation 6055 E. Washington Blvd., Ste. 1005 Commerce, CA 90040-2439																									X
7	Susan Ferris Bohemia Group 7471 Melrose Ave., Ste. 1 Hollywood, CA 90046-7551																									X
8	Lupe Aldaco, Jr. President Bricklayers & Allied Craftworkers Local 4 2679 Sierra Way La Verne, CA 91750-5642																									X
9	Amy Minter Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 Sunjana Supekar Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 (August 12, 2022, letter)	X				X							X			X					X			X	X	

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10	Amy Minter Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 Sunjana Supekar Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 (September 12, 2022, letter)																			X						
11	Amy Minter Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 Sunjana Supekar Chatten-Brown, Carstens & Minter LLP 2200 Pacific Coast Highway, Ste. 318 Hermosa Beach, CA 90254-2702 (September 13, 2022, letter)	X		X		X		X			X		X							X					X	
12	Jessica Lall President & CEO Central City Association of Los Angeles 626 Wilshire Blvd., Ste. 850 Los Angeles, CA 90017-2938																									X
13	Tom Williams President Citizens Coalition for a Safe Community 4117 Barrett Rd. Los Angeles, CA 90032-1712	X				X		X		X	X		X												X	
14	Oscar Arslanian Publisher Discover Hollywood Magazine 5419 Hollywood Blvd., Ste. C717 Los Angeles, CA 90027-3480																									X

Table II-1 (Continued)
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15	Jacqueline Canter Fairfax Business Association 419 N. Fairfax Ave. Los Angeles, CA 90036-1716																									X
16	Laura Lake Fix the City laura.lake@gmail.com	X		X			X	X	X	X	X	X	X	X		X	X			X		X			X	
17	Brian Larrabee Executive Director Good City Mentors																									X
18	Michael Patterson Business Manager Heat & Frost Insulators Local 5 P.O. Box 3160 Ontario, CA 91761-0916																									X
19	Brian Curran Hollywood Heritage, Inc. P.O. Box 2586 Hollywood, CA 90078-2586	X				X																			X	
20	Cindy Chvatal President Hancock Park Homeowners Assn. 137 N. Larchmont Blvd., #718 Los Angeles, CA 90004-3704 Mark Alpers Land Use Chair Hancock Park Homeowners Assn. 137 N. Larchmont Blvd., #718 Los Angeles, CA 90004-3704					X														X					X	
21	Stephan Davis Business Manager/Financial Secretary IBEW Local Union 40 5643 Vineland Ave. North Hollywood, CA 91601-2096																									X

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22	Keith Harkey Business Manager Ironworkers Local 433 17495 Hurley St. East City of Industry, CA 91744-5106																									X
23	Rachel Grose Executive Director Jewish Free Loan Association 6505 Wilshire Blvd., Ste. 715 Los Angeles, CA 90048-4958																									X
24	Adrian Scott Fine Senior Director of Advocacy Los Angeles Conservancy 523 W. Sixth St., Ste. 826 Los Angeles, CA 90014-1248																									X
25	Chris Hannan Executive Secretary LA/Orange Counties Building and Construction Trades Council 1626 Beverly Blvd. Los Angeles, CA 90026-5784																									X

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26	<p>George J. Mhlsten Latham & Watkins 355 S. Grand Ave., Ste. 100 Los Angeles, CA 90071-1560</p> <p>Eric C. Lu Ramboll US Consulting, Inc. 5 Park Plaza, Ste. 500 Irvine, CA 92614-8525</p> <p>Donn R. Grenda Principal Statistical Research, Inc. 617 Texas St. Redlands, CA 92374-3072</p> <p>Dean G. Francuch Senior Associate Shannon & Wilson 100 N. First St., Ste. 200 Burbank, CA 91502-1845</p> <p>R. Travis Deane Vice President Shannon & Wilson 100 N. First St., Ste. 200 Burbank, CA 91502-1845</p> <p>David S. Shender Linscott, Law & Greenspan, Engineers 600 S. Lake Ave., Ste. 500 Pasadena, CA 1106-3907</p>	X		X		X	X	X	X	X	X	X	X			X	X			X		X	X	X	X	
27	<p>Michael S. Dea Business Manager LiUNA Local 1184 1128 E. La Cadena Dr. Riverside, CA 92507-8695</p>																									X

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28	Allan J. Abshez Partner Loeb & Loeb LLP 10100 Santa Monica Blvd., Ste. 2200 Los Angeles, CA 90067-4120	X	X			X							X	X						X				X	X	
29	Maria S. Salinas President & CEO Los Angeles Area Chamber of Commerce 350 S. Bixel St. Los Angeles, CA 90017-1418																									X
30	Dan Seaver Executive Director & Co-Founder ManifestWorks 823 Seward St. Los Angeles, CA 90038-3601																									X
31	Donald R. Duckworth Executive Director Melrose Arts District 1934 Wilson Ave. Arcadia, CA 91006																									X
32	Greg Goldin President Miracle Mile Residential Assn. P.O. Box 361295 Los Angeles, CA 90036-9495	X		X											X	X	X			X					X	
33	Dennis Wachs Senior Lumber Trader Neiman Reed Lumber Company 7875 Willis Ave. Panorama City, CA 91402-5964																									X
34	Barbara Gallen President Park La Brea Impacted Residents Group 16255 Ventura Blvd., Ste. 950 Encino, CA 91436-2313								X							X				X					X	

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35	Jack H. Rubens Sheppard Mullin Richter & Hampton LLP 333 S. Hope St., Fl. 43 Los Angeles, CA 90071-1422 Eric C. Lu Ramboll US Consulting, Inc. 5 Park Plaza, Ste. 500 Irvine, CA 92614-8525 David S. Shender Linscott, Law & Greenspan, Engineers 600 S. Lake Ave., Ste. 500 Pasadena, CA 1106-3907 Donn R. Grenda Principal Statistical Research, Inc. 617 Texas St. Redlands, CA 92374-3072	X		X		X	X	X	X	X	X	X	X			X	X		X	X	X	X	X	X	X	
36	Rick Vazquez President/Business Representative Sprinkler Fitters Local 709 12140 Rivera Rd. Whittier, CA 90606-2602																									X
37	Adele B. Wilson Executive Director Streetlights The Lot at Formosa 1041 N. Formosa Ave., WRT Ste. 6 Los Angeles, CA 90046-6703																									X
38	William Steiner Business Manager UA Local 398 8590 Utica Ave., Ste. 200 Rancho Cucamonga, CA 91730-4872																									X

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39	Tema Staig Executive Director Women In Media tema@womenmedia.com																									X
40	Artin A. 350 N. Detroit St. Los Angeles, CA 90036-2531														X										X	
41	Leslie Aaronson 319 S. Orange Dr. Los Angeles, CA 90036-3008	X				X		X												X					X	
42	Seth Aaronson 319 S. Orange Dr. Los Angeles, CA 90036-3008																								X	
43	Andrew Abbott 919 N. Genesee Ave. West Hollywood, CA 90046-7350					X																			X	
44	Sam Aberman 351 1/2 N. Stanley Ave. Los Angeles, CA 90036-2335																			X					X	
45	Alon Abishoor 905 N. Genesee Ave., #A Los Angeles, CA 90046-7319						X		X	X															X	
46	Aliza Abraham 539 N. Formosa Ave. Los Angeles, CA 90036-1944	X															X			X					X	
47	John Abram 346 N. La Jolla Ave. Los Angeles, CA 90048-2231			X										X			X			X					X	
48	Dan Agil	X																							X	
49	Norberto Aguilar 317 N. Ogden Dr. Los Angeles, CA 90036-2130			X										X						X					X	

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50	Yvette Alexander 125 S. Highland Ave. Los Angeles, CA 90036-3028																									X
51	Walter Altamirano alta_walt@sbcglobal.net																									X
52	Liz Alter 646 N. Orlando Ave., #4 West Hollywood, CA 90048			X										X			X			X					X	
53	Nathan Alyesh 172 N. Formosa Ave. Los Angeles, CA 90036-2818			X					X																X	
54	Lisa Anderson 507 N. Harper Ave. Los Angeles, CA 90048-2222			X										X						X					X	
55	Alex Arana 327 N. Stanley Ave. Los Angeles, CA 90036-2313	X																		X						
56	Karen Aspen 511 N. Poinsettia Pl. Los Angeles, CA 90036-1928			X																					X	
57	Laura Assael 318 S. Mansfield Ave. Los Angeles, CA 90036-3057	X																		X					X	
58	John Atwater 600 Montgomery St. San Francisco, CA 94111-2702																									X
59	Randy Auerbach 8350 W. Fourth St. Los Angeles, CA 90048-4203																			X					X	
60	Vanessa Ault 429 N. Orange Grove Ave. Los Angeles, CA 90036-1743					X																			X	

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61	Jesus Avila 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
62	Edward Azizi 6530 Drexel Ave. Los Angeles, CA 90048-4708	X																							X	
63	Samantha Azulay samazulay@gmail.com												X												X	
64	Chanan Back 539 N. Poinsettia Pl. Los Angeles, CA 90036-1928	X		X																X					X	
65	Pamela Bajarski 946 N. Genesee Ave. West Hollywood, CA 90046-7320					X														X					X	
66	Josh Barbash 104 S. Fuller Ave. Los Angeles, CA 90036	X		X									X	X											X	
67	Raymond Bardeau																								X	
68	David Barlag 448 S. Orange Dr. Los Angeles, CA 90036-3510			X																X					X	
69	Barbara Bartnof barbarabartnof@gmail.com																								X	
70	Laura Basmajian lbasmajian@tvcityla.com																									X
71	David Bass 434 N. Detroit St. Los Angeles, CA 90036-2529																								X	
72	Regina Bass 434 N. Detroit St. Los Angeles, CA 90036-2529	X																							X	
73	Abbe Bauer 306 S. Citrus Ave. Los Angeles, CA 90036-3036	X													X					X					X	

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74	Christopher Becker 1720 N. Fuller Ave., Apt. 544 Los Angeles, CA 90046-3078																									X
75	Catherine Bergmann 556 N. Croft Ave., Apt. 8 West Hollywood, CA 90048-2542	X		X										X			X			X		X			X	
76	Sara Berthialilue 537 N. Orlando Ave., Apt. 4 Los Angeles, CA 90048-2530					X	X			X				X						X					X	
77	Alex Bidar 935 N. Genesee Ave., Apt. 2 West Hollywood, CA 90046-7348						X		X	X															X	
78	Asher Biron 420 N. Formosa Ave. Los Angeles, CA 90036			X										X						X					X	
79	Chani Biron 320 N. Formosa Ave. Los Angeles, CA 90036-2527			X		X								X						X					X	
80	Paul Bisbano 637 N. Detroit St. Los Angeles, CA 90036-1947	X																							X	
81	Nancy Blecker nancyb2001us@yahoo.com																									X
82	Shelby Blecker da_kidd@pacbell.net																									X
83	Jeff Blum 429 1/2 N. Gardener St. Los Angeles, CA 90036-5733																			X						
84	Avi Blumenstein 411 S. Orange Dr. Los Angeles, CA 90036-3509																			X					X	
85	Kanyne Boese 905 N. Genesee Ave. West Hollywood, CA 90046-7319			X		X								X			X			X					X	

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86	Robert Bonner 8318 W. Fourth St. Los Angeles, CA 90048-4203	X																							X	
87	Joey Bothwell 313 N. Ogden Dr. Los Angeles, CA 0036-2130			X										X						X						
88	Hope Bowhay hope.bowhay@tvcityla.com																									X
89	Julianne Braden 333 S. Citrus Ave. Los Angeles, CA 90036-3035	X								X																
90	Aaron Braun 364 S. Citrus Ave. Los Angeles, CA 90036-3036																			X					X	
91	Schneur Braunstein Touch of Kindness, Inc. 345 N. La Brea Ave., Ste. 208 Los Angeles, CA 90036-2539																									X
92	Patricia Breen 118 N. La Jolla Ave. Los Angeles, CA 90048-3528																			X					X	
93	Erik Breiter 5917 Amondo Cir. Simi Valley, CA 93063-3601																									X
94	Tracie Breiter 5917 Amondo Cir. Simi Valley, CA 93063-3601																									X
95	Malkee Breitman 512 N. Fuller Ave. Los Angeles, CA 90036-1941																			X					X	
96	Khalam Bridger 561 N. Orlando Ave., Apt. 7 Los Angeles, CA 90048-2534												X							X					X	

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97	Aron Bross 167 N. Detroit St. Los Angeles, CA 90036-2915	X																		X					X	
98	Andrea Bucci																									X
99	Fradel Bukiat 343 N. Formosa Ave. Los Angeles, CA 90036-2526												X							X					X	
100	Kathryn Bundy katbuns@gmail.com	X						X							X					X					X	
101	Ashley Burgess 234 S. Figueroa St. Los Angeles, CA 90012-2541																									X
102	Andrea C. 349 S. Orange Dr. Los Angeles, CA 90036-3008	X				X				X				X						X					X	
103	Mamata C. 626 S. Orange Dr. Los Angeles, CA 90036-2006			X													X			X					X	
104	Johnathan Cahill 4125 S. Figueroa St. Los Angeles, CA 90037-2092																									X
105	Christopher Callon 7947 W. Fourth St. Los Angeles, CA 90048-4412			X					X	X		X													X	
106	Reululd Campbell 636 N. Spaulding Ave. Los Angeles, CA 90036-1869					X											X			X					X	
107	Gialiamp Carmassi 342 1/2 N. Stanley Ave. Los Angeles, CA 90036-2397	X																		X					X	
108	Marian Carr 104 S. Formosa Ave. Los Angeles, CA 90036-2816																			X					X	

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109	Ty Carrington 421 1/2 Sierra Bonita Ave. Los Angeles, CA 90036-2464							X																	X	
110	Jean Claude Carron 438 N. Edinburgh Ave. Los Angeles, CA 90048-2308	X																							X	
111	Mychael Carter 8261 W. Fourth St. Los Angeles, CA 90048-4401	X																		X						
112	Madi Cash 358 S. Mansfield Ave. Los Angeles, CA 90036-3057	X																		X	X				X	
113	Pedro Castro 518 N. Spaulding Ave. Los Angeles CA 90036-1845	X												X											X	
114	Catherine Ceccola 464 N. Hayworth Ave. Los Angeles, CA 90048-2704	X		X																X					X	
115	Tera Cederquist 406 N. Gardner St. Los Angeles, CA 90036-5728	X																		X					X	
116	Chris Cedize 8211 Blackburn Ave., Apt. 8 Los Angeles, CA 90048-4229																			X						
117	Sue Chang 7957 1/2 Blackburn Ave. Los Angeles, CA 90048-4461	X																		X					X	
118	Tessa Chapman 537 N. Orlando Ave., Apt. 5 Los Angeles, CA 90048-2530			X										X			X			X					X	
119	Ed Chau 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
120	Aida Chazar 132 N. Detroit St. Los Angeles, CA 90036-2916	X																							X	
121	Julietta Chetaian 230 S. Detroit St. Los Angeles, CA 90036-3034																			X					X	
122	Cliff Cheng our.neighborhood@gmail.com		X										X	X						X					X	
123	Carol Chin 419 N. Flores St. Los Angeles CA 90048-2611			X										X			X			X					X	
124	Yoonha Choi 119 N. Kilkea Dr. Los Angeles, CA 90048-3523			X										X			X			X					X	
125	Mateo Ciarlo 748 N. Detroit St. Los Angeles, CA 90046-7606																			X					X	
126	Sylvester Civallo 6521 Drexel Ave. Los Angeles CA 90048-4707			X																					X	
127	James Clark 606 N. Fuller Ave. Los Angeles, CA 90036-1939			X										X	X					X		X			X	
128	Dana Claudat danaclaudat@yahoo.com	X		X										X											X	
129	Meir Cohen 539 N. Harper Ave. Los Angeles CA 90048-2222																			X					X	
130	Susan Collette 6357 Drexel Ave. Los Angeles CA 90048-4703														X					X					X	
131	Mercedes Connor 455 N. Orange Grove Ave. Los Angeles, CA 90036-1718	X																		X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
132	Selena Cornish 1115 N. Flores St., Apt. 8 West Hollywood, CA 90069-2998																									X
133	Rich Cox 919 N. Genessee Ave. West Hollywood, CA 90046-7350	X												X						X					X	
134	Vicki Crawford 6553 Colgate Ave. Los Angeles, CA 90048-4410	X																		X					X	
135	Fred Croci 527 N. Orlando Ave. Los Angeles, CA 90048-2562	X		X																X					X	
136	Anna Culp 130 N. Sweetzer Ave. Los Angeles, CA 90048-3508	X																		X					X	
137	Christina D. 123 N. La Jolla Ave. Los Angeles, CA 90048-3527																			X					X	
138	Nadine Danziger 467 N. Gardner St. Los Angeles, CA 90036-5708			X								X		X						X					X	
139	Katherine Darbreloff 541 Edinburgh Ave. Los Angeles, CA 90048-2309	X																							X	
140	Tammy Davis 326 S. Mansfield Ave. Los Angeles, CA 90036-3057																			X					X	
141	Rocky Deangelis 132 N. La Jolla Ave. Los Angeles, CA 90048-3528			X										X			X								X	
142	Jewel M. Debah 6767 Drexel Ave. Los Angeles, CA 90048-4210	X						X							X					X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
143	Jan-Michael Del Mundo 521 1/2 N. Gardener St. Los Angeles, CA 90036-5710			X			X													X					X	
144	Daniel Delmrte 461 Vista St. Los Angeles, CA 90036-5742			X	X																			X	X	
145	Ryan and Laura DeNardo 109 S. Kilkea Dr. Los Angeles, CA 90048-3525																X			X					X	
146	Kathleen De-Nicola 368 N. Gardner St. Los Angeles, CA 90036-5751	X																						X	X	
147	Derek 368 N. Orlando Ave. Los Angeles, CA 90048-2516													X												
148	Joanna Dewberry 2401 S. Sycamore Ave. Los Angeles, CA 90016-2136																									X
149	Erica Diamond 903 N. Genesee Ave. West Hollywood, CA 90046-7319															X	X			X					X	
150	Josh Diaz Rachel Giron 437 N. Curson Ave. Los Angeles, CA 90036-2353																									X
151	Silvio Diaz 2714 Ivan Ct. Los Angeles, CA 90039-2601	X											X												X	
152	Karen Diehl 115 N. Doheny Dr., Apt. 307 Los Angeles, CA 90048-2829	X				X							X							X					X	
153	Steve Dixon 343 N. Sierra Bonita Ave. Los Angeles, CA 0036-2452		X	X										X	X					X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
154	Bosko Dobiic 315 N. Stanley Ave. Los Angeles, CA 90036-2328	X																							X	
155	Adam Dominic 351 N. Ogden Dr., Apt. 1 Los Angeles, CA 90036-2125			X													X			X					X	
156	Michael Douglas mdendsis@gmail.com																X									
157	Thomas Drescher 443 N. Harper Ave. Los Angeles, CA 90048-2220			X																X					X	
158	Tom Drew 2714 Ivan Ct. Los Angeles, CA 90039-2601																X									
159	Helen Duffy 129 N. Detroit St. Los Angeles, CA 90036-2915	X													X				X						X	
160	Cassandra Duran 427 1/4 N. Sierra Bonita Ave. Los Angeles, CA 90036-2460			X										X	X										X	
161	Dylan 634 N. Orlando Ave. West Hollywood, CA 90048-2112													X											X	
162	Tommy Edery 106 N. Fuller Ave. Los Angeles, CA 90036-2812																			X					X	
163	Edward P. Edward 25 S. Oak Knoll Ave., Apt. 331 Pasadena, CA 91101-2169																									X
164	Bob Eisele 359 S. Citrus Ave. Los Angeles, CA 90036-3035	X		X										X						X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
165	Diana Elizalde 7100 Hillside Ave., Apt. 102 Los Angeles, CA 90046-2339																									X
166	Jeremy Elkaim 413 N. Ogden Dr. Los Angeles, CA 90036-1710			X																X					X	
167	Holly Fader	X						X							X					X					X	
168	Nina Fales	X						X							X					X					X	
169	Rainbow Fang 1211 Graynold Ave. Glendale, CA 91202-2020																									X
170	Julia Farman 128 N. La Jolla Ave. Los Angeles, CA 90048-3528	X																							X	
171	Nosson Fasman 239 S. Formosa Ave. Los Angeles, CA 90036-2813																			X					X	
172	Michael Fazie 7957 W. Fourth St. Los Angeles CA 90048-4412	X		X										X						X					X	
173	Joe Ferreri 454 N. Curson Ave. Los Angeles, CA 90036-2371	X																							X	
174	Ryan Fey 460 Harper Ave. Los Angeles CA 90048-2221	X				X																			X	
175	Lisa Field														X					X					X	
176	Allen Fineman 614 S. Orange Dr. Los Angeles, CA 90036-3508	X				X											X			X						
177	Julie Finger 156 S. Gardner St. Los Angeles, CA 90036-2718													X											X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
178	Brian Finke 6367 Drexel Ave. Los Angeles, CA 90048-4703	X		X																X					X	
179	Miriam Fishman 135 S. Formosa Ave. Los Angeles, CA 90036-2815	X				X								X						X					X	
180	Joanne Floro 152 S. Hayworth Ave., Apt. 5 Los Angeles, CA 90048-3616																								X	
181	Victoria Floro 152 S. Hayworth Ave., Apt. 5 Los Angeles, CA 90048-3616																								X	
182	Stephen J. Ford 941 N. Genesee Ave., Apt. 3 West Hollywood, CA 90046-7347			X																X					X	
183	Austin Foxxe 112 S. Hayworth Ave., Apt. 5 Los Angeles, CA 90048-3623	X		X																X						
184	Tamar Frankiel 435 N. Alta Vista Blvd. Los Angeles, CA 90036-2540 (August 29, 2022, letter)												X							X					X	
185	Tamar Frankiel 435 N. Alta Vista Blvd. Los Angeles, CA 90036-2540 (September 13, 2022, letter)	X																							X	
186	Yosef Freedman 611 N. Poinsettia Pl. Los Angeles, CA 90036-1926					X																				
187	Alek Friedman alek3773@gmail.com																									X
188	Mark Friedman 503 N. Fuller Ave. Los Angeles, CA 90036-1940	X		X			X			X															X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
189	Sharon Friedman 503 N. Fuller Ave. Los Angeles, CA 90036-1940	X	X																	X						
190	Steve Friedman 455 N. Edinburgh Ave. Los Angeles, CA 0048-2307																			X						
191	Josh Frieman 321 S. Burnside Ave. Los Angeles, CA 90036-3269																									X
192	David Frishberg 118 S. Laurel Ave. Los Angeles, CA 90048-3514	X																		X					X	
193	Kim Funaro 10831 Fruitland Dr. Studio City, CA 91604-3550																									X
194	G. A.	X						X							X					X					X	
195	Eduardo Gallardo 320 S. Clark Dr., Apt. 304 Los Angeles, CA 90048-3230																									X
196	Shavinder Galtere 8137 Blackburn Ave. Los Angeles, CA 90048-4423	X																							X	
197	Miguel Gamboa 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
198	Diana Gamez 13540 Flomar Dr. Whittier, CA 90605-2230																									X
199	Ann Gaskin 628 N. Laurel Ave. Los Angeles, CA 90048-2321	X				X									X										X	
200	Henry Geller 344 N. Ogden Dr. Los Angeles, CA 90036-2144	X						X							X					X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
201	Karen Gerst kgerst@earthlink.net												X							X				X	X	
202	Ewing Gillespy 341 Fuller Ave. Los Angeles, CA 90036-2522																X			X					X	
203	Jane Gilman janelarch@icloud.com	X																		X					X	
204	Chana Ginsberg 145 N. Fuller Ave. Los Angeles, CA 90036-2811					X														X					X	
205	Deborah Glass 8261 W. Fourth St. Los Angeles, CA 90048-4401					X								X						X						
206	Spencer Glesby 333 1/2 N. Ogden Dr. Los Angeles, CA 90036-2137		X	X										X						X					X	
207	Carmella and Deborah Glezer 419 N. Sweetzer Ave. Los Angeles, CA 90048-2603			X										X						X					X	
208	Bruce Gold P.O. Box 1656 Studio City, CA 91614-0656																									X
209	Joel Gold 530 N. Fuller Ave. Los Angeles, CA 90036-1941	X				X		X				X								X					X	
210	Beth Goldberg 7974 W. Fourth St. Los Angeles, CA 90048-4413	X																		X					X	
211	Etti Goldstein 221 S. Alta Vista Blvd. Los Angeles CA 90036-2821	X								X	X	X													X	
212	Kymn Goldstein kymngoldstein@gmail.com	X			X															X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
213	Zev Goldstein 122 N. Alta Vista Blvd. Los Angeles, CA 90036-2826	X			X		X																		X	
214	Ethan Goodwin 353 1/2 N. Curson Ave. Los Angeles, CA 90036-2365			X		X								X	X					X					X	
215	Jerzy Gorczyca jgorczyca@tvcityla.com																									X
216	Marzena Gorczyca marzena.gorczyca@yahoo.com																									X
217	Patrick Gorman 536 N. Croft Ave. Los Angeles, CA 90048-2511			X																X						
218	Lori Grapes 6684 Colgate Ave. Los Angeles, CA 90048-4205																								X	
219	Tandi and Ethan Greenberg 461 N. Orange Grove Ave. Los Angeles, CA 90036-1757			X										X			X			X						
220	Ron Greenwood 637 S. Dunsmuir Ave., Apt. 11 Los Angeles, CA 90036-5915																									X
221	Leo Grifka Short Stories Hotel 115 S. Fairfax Ave. Los Angeles, CA 90036-2106																									X
222	Sue Grishman 112 N. Hayworth Ave., Apt. 6 Los Angeles, CA 90048-3631	X											X							X						
223	Kathy Gronau 448 N. Kilkea Dr. Los Angeles, CA 90048-2229										X											X			X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
224	Meir Gul 429 N. Formosa Ave. Los Angeles, CA 0036-2524	X																							X	
225	Mia Hagerty miahagerty@gmail.com												X												X	
226	Jenny Haghtton 355 S. Orange Dr. Los Angeles, CA 90036-3008			X										X						X					X	
227	Ray Hahn 329 S. Mansfield Ave. Los Angeles, CA 90036-3058													X						X					X	
228	Daryl Hairson 6000 Comey Ave. Los Angeles, CA 90034-2204																									X
229	William Hallmark 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
230	Elsa Halpern 1320 N. Poinsettia Pl., Apt. 1 Los Angeles, CA 90046-4328																									X
231	Alexa Hand 560 N. Flores St. West Hollywood, CA 90048-6004			X																X					X	
232	Rita and Michael Hand 362 N. Flores St. Los Angeles, CA 90048-2610	X		X		X								X			X			X					X	
233	Greg Hansen 439 1/2 N. Gardner St. Los Angeles, CA 90036-5753													X												
234	Greg Hansen 439 1/2 N. Gardner St. Los Angeles, CA 90036-5753			X										X						X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
235	Robert Hansen 263 Norumbega Dr. Monrovia, CA 91016-2415																									X
236	Sam Hansen 402 N. Vista St. Los Angeles, CA 90036-5741	X		X										X			X			X					X	
237	Gale Harlow 457 1/2 N. Hayworth Ave. Los Angeles, CA 90048-2703																			X					X	
238	Kathleen Harper 522 N. Edinburgh Ave. Los Angeles, CA 90048-2310																			X						
239	Susan Harrington 6351 Drexel Ave. Los Angeles, CA 90048-4703	X		X																X					X	
240	James Harris jh3312@pacbell.net																									X
241	Monique Hart 624 S. Citrus Ave. Los Angeles, CA 90036-3535	X																		X					X	
242	Carol Hayes 401 S. Detroit St., Apt. 216 Los Angeles, CA 90036-3693																									X
243	Brian Head 439 1/2 N. Stanley Ave. Los Angeles, CA 90036-2301	X																		X					X	
244	Mendy Hecht 419 N. Poinsettia Pl. Los Angeles, CA 90036-2504																			X					X	
245	Kelsey Hellenbrand 8217 Blackburn Ave., Apt. 5 Los Angeles CA 90048-4231	X																		X					X	

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

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246	James Henly 804 S. Sherbourne Dr. Los Angeles CA 90035	X		X		X														X					X		
247	Matt Hensley matthensley@msn.com	X						X			X	X		X												X	
248	Armanda Hernandez 6500 Aria Blvd. Sandy Springs, GA 30328-3637																									X	
249	Jesus Hernandez 5830 Myrtle Ave. Long Beach, CA 90805-4111																									X	
250	M.E. Hernandez 8261 W. Fourth St. Los Angeles, CA 90048-4401																			X							
251	Allen Hershberg 455 N. Formosa Ave. Los Angeles CA 90036-2524					X																			X		
252	Maria Hershberg 455 N. Formosa Ave. Los Angeles, CA 90036-2524														X										X		
253	Gabriel Hershoff 164 S. Detroit St. Los Angeles, CA 90036-2914			X										X						X					X		
254	Shira Hershoff 164 S. Detroit St. Los Angeles, CA 90036-2914	X		X										X						X					X		
255	B. Herzhaft 327 1/2 Sierra Bonita Ave. Los Angeles, CA 90036-2446		X											X						X					X		
256	Alan Hirsch 329 N. Fuller Ave. Los Angeles, CA 90036-2522					X														X					X		

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

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257	Susan Hirschhaut 530 N. Harper Ave. Los Angeles, CA 90048-2223	X				X														X					X	
258	Lisa Hoffman 119 S. Alta Vista Blvd. Los Angeles, CA 90036-2823																			X					X	
259	Robert Hoffman 119 S. Alta Vista Blvd. Los Angeles, CA 90036-2823																			X					X	
260	Shawn Holden 101 N. Gardner St. Los Angeles, CA 90036-2719	X																							X	
261	Monica Hong 242 S. Detroit St. Los Angeles, CA 90036-3034	X				X											X			X					X	
262	Alexandra Hook 724 N. Spaulding Ave. Los Angeles, CA 90046-7422			X											X					X					X	
263	Ana Horzowitz 222 S. Formosa Ave. Los Angeles, CA 90036-2814			X													X			X					X	
264	Mario Horzowitz 222 S. Formosa Ave. Los Angeles, CA 90036-2814	X																		X					X	
265	Donna Houston 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
266	Mary Huth 344 S. Sycamore Ave. Los Angeles, CA 90036-3006	X				X														X					X	
267	Elizabeth Hutton ehutton44@gmail.com																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
268	Jerry Ickovic 459 N. Poinsettia Pl. Los Angeles, CA 90036-2504	X																							X	
269	Jodi Jackson 523 N. Orlando Ave. Los Angeles, CA 90048-2528																									X
270	Lior Jacob 934 N. Genesee Ave. West Hollywood, CA 90046-7346			X										X	X		X			X					X	
271	Daniel James 321 S. Burnside Ave. Los Angeles, CA 90036-3269																									X
272	Stuart James 350 S. Cloverdale Ave. Los Angeles, CA 90036-3472																									X
273	Tim Jones 336 N. Mansfield Ave. Los Angeles CA 90036-2624			X					X	X		X										X			X	
274	Kat Juda katjuda@yahoo.com												X							X					X	
275	James K. 329 S. Orange Dr. Los Angeles, CA 90036-3008							X		X										X					X	
276	Cheryl Kanekar cherylkanekar@yahoo.com	X																		X					X	
277	Ron Kaplan 445 N. Kilkea Dr. Los Angeles, CA 90048-2228	X			X		X							X						X					X	
278	Vikki Karan 422 N. Laurel Ave. Los Angeles, CA 90048-2351	X				X																			X	
279	Shira Karsen 315 N. Gardener St. Los Angeles, CA 90036-5713													X						X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
280	Pearl Katz 175 S. Detroit St. Los Angeles, CA 90036-2913	X																							X	
281	Shalom Katz 175 S. Detroit St. Los Angeles, CA 90036-2913	X																							X	
282	Daniel Kessons 6646 Drexel Ave. Los Angeles, CA 90048-4209	X																							X	
283	Annette Kiene 531 Pier Ave., Spc. 32 Hermosa Beach, CA 90254-3830																									X
284	Daniel Kim 418 S. Sycamore Ave. Los Angeles, CA 90036-3506	X				X																			X	
285	Julie Kim 403 S. Orange Dr. Los Angeles, CA 90036-3509	X				X		X												X					X	
286	London Kim 242 S. Detroit St. Los Angeles, CA 90036-3034																			X						
287	Noah Kistler 112 N. Los Angeles, CA 90048	X		X										X			X			X					X	
288	Elijah Klapper 539 N. Formosa Ave. Los Angeles, CA 90036-1944														X										X	
289	Michael Klausman 1855 Kanola Rd. La Habra Heights, CA 90631-8218																									X
290	Jeff Kloehn 347 N. Ogden Dr. Los Angeles, CA 90036-2142	X																		X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
291	Gabrielle Knable 435 N. Croft Ave. Los Angeles, CA 90048-2508													X			X			X					X	
292	Sascha Knopf 459 1/2 N. Gardener St. Los Angeles, CA 90036-5708	X													X					X		X			X	
293	Jacob Koo 118 S. Kilkea Dr. Los Angeles, CA 90048-3526			X																X					X	
294	Robin Kopf 313 N. Stanley Ave. Los Angeles, CA 90036-2328																								X	
295	Sharon Korr 160 S. Vista Dr. Los Angeles, CA 90036-2708	X																		X					X	
296	Rick Kosick 164 S. Hayworth Ave., Apt. 07 Los Angeles, CA 90048-3613													X						X						
297	Shepard Koster 148 S. Hayworth Ave., Apt. 4 Los Angeles, CA 90048-3617																			X					X	
298	Douglas Kriete 908 S. Genesse Ave., #7 Los Angeles, CA 90036	X	X							X				X	X					X					X	
299	Tamara Krinsky 104 N. La Jolla Ave. Los Angeles, CA 90048-3528	X		X										X						X					X	
300	Ken Kristensen 426 Vista St. Los Angeles, CA 90036-5741			X																X					X	
301	Rachel Kushner rachelkushner@gmail.com												X	X						X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
302	Kelge Laau 433 S. Mansfield Ave. Los Angeles, CA 90036-3515	X											X												X	
303	Paul Lahn 332 N. Stanley Ave. Los Angeles, CA 90036-2332	X		X			X		X	X										X					X	
304	John Lambert 434 N. Laurel Ave. Los Angeles CA 90048-2351							X							X					X					X	
305	Cecile Lamonte 7933 Blackburn Ave. Los Angeles, CA 90048-4417																			X					X	
306	Jill Landsman 8148 W. Fourth St. Los Angeles, CA 90048-4416	X				X									X										X	
307	Mark Landsman 8148 W. Fourth St. Los Angeles, CA 90048-4416	X				X									X										X	
308	Eva Langer 361 N. Poinsettia Pl. Los Angeles, CA 90036-2506												X							X					X	
309	Lois Lanyard 740 N. Kings Rd., Apt. 311 Los Angeles, CA 90069-5479																									X
310	Nick Lapiana 141 N. Harper Ave. Los Angeles, CA 90048-3503	X												X											X	
311	Sara Laskey 102 S. Detroit St. Los Angeles, CA 90036-2914																			X					X	
312	Ariel Lawrence 439 N. Ogden Dr. Los Angeles, CA 90036-1748																			X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
313	Kristina Leach 506 N. Sweetzer Ave. Los Angeles, CA 90048-2606	X		X																X					X	
314	Leigh Lavitt 351 N. Ogden Dr., Apt. 3 Los Angeles, CA 90036-2124	X												X											X	
315	Irvin Lebovics 8635 W. Third St., Ste. 580W Los Angeles, CA 90048-6144																									X
316	Jimmy Lee 143 S. Edinburgh Ave. Los Angeles, CA 90048-3605																			X				X		
317	Kerry Lee 1401 Douglas St. Los Angeles, CA 90026-3461																									X
318	Alex Leeming alexandraleeming@gmail.com	X	X	X									X							X				X	X	
319	Linda Lena 435 N. Sierra Bonita Ave. Los Angeles, CA 90036-2470													X						X					X	
320	Don Leonard 1820 El Cerrito Pl., Apt. 105 Los Angeles, CA 90068-3701																									X
321	Ronny Leroy 8108 W. Fourth St. Los Angeles, CA 90048-4416	X		X																X					X	
322	Esther Lester 7815 Beverly Blvd. Los Angeles, CA 90036-2111																									X
323	Lauren Letherer 451 N. Stanley Ave. Los Angeles, CA 90036-2396					X		X		X										X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
324	Steven and Daniel Levenson 428 N. Sweetzer Ave. Los Angeles, CA 90048-2604												X							X					X	
325	Devora Levin 360 N. Laurel Ave. Los Angeles, CA 90048-2314	X																							X	
326	Tiffanie Levine 410 N. Alta Vista Blvd. Los Angeles, CA 90036-2541	X																		X					X	
327	Harriet Levins 412 N. Orlando Ave. Los Angeles, CA 90048-2518			X																						
328	Rosalind Levitt 122 S. Laurel Ave. Los Angeles, CA 90048-3514	X		X																X					X	
329	L. Lewin 506 N. Fuller Ave. Los Angeles, CA 90036-1941	X				X														X					X	
330	Stephanie Lewis 8328 W. Fourth St. Los Angeles, CA 90048-4203																			X					X	
331	Gary Li 7800 Beverly Blvd. Los Angeles, CA 90036-2112			X											X										X	
332	Theresa Li 327 N. Kilkea Dr. Los Angeles, CA 90048-2226																									X
333	Nathan Licht 556 N. Croft Avenue, Apt. 3 West Hollywood, CA 90048-2542			X										X	X		X			X						
334	Ty Linegar 335 1/2 N. Gardener St. Los Angeles, CA 90036-5706	X																		X						

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
335	Robin Lippin 445 N. Orlando Ave. Los Angeles, CA 90048-2517			X																					X	
336	Jesse Lira 105 N. Kilkea Dr. Los Angeles, CA 90048-3523			X										X						X					X	
337	Lise Ville 449 N. Orlando Ave. Los Angeles, CA 90048-2517	X				X								X			X			X					X	
338	Christopher Lord 27748 Summer Grove Pl. Santa Clarita, CA 91354-1895																									X
339	Joan Lounsbery 348 Hauser Blvd., #1-215 Los Angeles, CA 90036-3276																									X
340	Jillian Lovell 536 N. Sweetzer Ave. Los Angeles, CA 90048-2652																									X
341	Bennett Barba Low 414 N. La Jolla Ave. Los Angeles, CA 90048-2233	X																		X					X	
342	Ginny Lubbin 7370 Rosewood Ave. Los Angeles, CA 90036-1918	X						X					X							X				X	X	
343	Norma Luna 118 S. Hayworth Ave., Apt. 1 Los Angeles, CA 90048-3672	X																		X					X	
344	Rick Luna 118 S. Hayworth Ave., Apt. 1 Los Angeles, CA 90048-3672	X																		X					X	
345	Ben Mack																									X
346	Casey Maddren 2141 Cahuenga Blvd., Apt. 17 Los Angeles, CA 90068-2781	X		X					X											X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
347	Roman Madril 800 S. Fairfax St., Apt. 17 Los Angeles, CA 90036-4466	X															X			X					X	
348	Miriam Majer 327 N. Alta Vista Blvd. Los Angeles, CA 90036-2542																					X			X	
349	Sol Majer 327 N. Alta Vista Blvd. Los Angeles, CA 90036-2542			X																					X	
350	Mikel Mann P.O. Box 515407 Los Angeles, CA 90051-6707																									X
351	Jeff Mapes 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
352	David Marady	X						X							X					X						X
353	Jessica Marak 459 N. Edinburgh Ave. Los Angeles, CA 90048-2307			X					X											X						
354	Karen Margarete P.O. Box 691238 West Hollywood, CA 90069-9238																									X
355	Solomon Margo 612 N. Laurel Ave. Los Angeles, CA 90048-2321	X																		X					X	
356	Stephen Marinko 624 N. Poinsettia Pl. Los Angeles, CA 90036-1927	X						X						X						X					X	
357	Vicky Marino 7905 Melrose Ave. Los Angeles, CA 90046-7109																									X
358	Larry Marshall 648 N. Laurel Ave. Los Angeles, CA 90048-2321																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
359	Jose Martinez 130 N. Sweetzer Ave. Los Angeles CA 90048-3508	X																		X					X	
360	Alicia Matricardi 6230 San Vicente Blvd., Ste. 23 Los Angeles, CA 90048-5416																									X
361	Luis Matute 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
362	Anne McAllister 144 N. Detroit St. Los Angeles, CA 90036-2916	X																							X	
363	Kathryn McGee kathryn@mcgeehistoric.com																X			X						
364	Allyse McGrath 353 N. Sierra Bonita Ave., #6 Los Angeles, CA 90036-2456					X																				
365	Megan McGregor 8125 1/2 Blackburn Ave. Los Angeles, CA 90048-4423	X																							X	
366	Dayn McHugh 537 N. Orlando Ave., Apt. 2 Los Angeles, CA 90048-2530	X																							X	
367	Chris McKee gawara@ragcha.com																			X					X	
368	Luke McKinley 538 N. Spaulding Ave. Los Angeles, CA 90036-1857	X		X					X					X											X	
369	Tara McVictor 153 S. Laurel Ave. Los Angeles, CA 90048-3513	X		X					X													X			X	
370	Peter Meadows 360 1/2 N. Gardner St. Los Angeles, CA 90036-5723	X																				X			X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
371	Zak Means 9217 Alcott St. Los Angeles, CA 90035-3103																									X
372	Faige Meller 336 N. Kilkea Dr. Los Angeles, CA 90048-2227												X							X					X	
373	Harry Meller 6500 W. Fifth St. Los Angeles, CA 90048-4712			X		X														X					X	
374	David Meltzer heytmrw2@gmail.com																								X	
375	David Meltzer heytmrw2@gmail.com			X																X					X	
376	Hannah Menkin 424 N. Alta Vista Blvd. Los Angeles, CA 90036-2541	X																							X	
377	Alex Messana 481 S. Roxbury Dr. Beverly Hills, CA 90212-4165																									X
378	Ida Messinger 448 N. Edinburgh Ave. Los Angeles, CA 90048-2308	X																							X	
379	J. Brandon Meyer 535 N. Spaulding Ave. Los Angeles, CA 90036-1855			X										X						X				X	X	
380	Stephen Meyerson 2503 Spreckels Ln. Redondo Beach, CA 90278-5336																									X
381	Lisa Miller 527 N. Orlando Ave., Apt. 5 West Hollywood, CA 90048-2576	X				X		X			X	X								X					X	
382	Lori Miller 527 N. Orlando Ave., Apt. 5 West Hollywood, CA 90048-2576			X																X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
383	Ronda Minks 514 N. Hayworth Ave., Apt. 204 Los Angeles, CA 90048-2787																									X
384	Kristin Mirek 525 N. Curson Ave. Los Angeles, CA 90036-1813	X																		X				X	X	
385	L. Mita 8701 Delgany Ave., Unit 103 Playa del Rey, CA 90293-8151																									X
386	Nicole Mitchell 367 N. Stanley Ave. Los Angeles, CA 90036-2338																			X					X	
387	Maliha Moloo 8125 Blackburn Ave. Los Angeles CA 90048-4423			X																					X	
388	Richard Moon richard@wom3pl.com												X												X	
389	Lynn Mooney 150 S. Detroit St. Los Angeles, CA 90036-2914					X																			X	
390	Robert Moran 120 N. Fuller Ave. Los Angeles, CA 90036-2812			X																X					X	
391	Rick Morgan 424 N. Ogden Dr., Apt. 2 Los Angeles, CA 90036-1725	X																		X					X	
392	Alyssa Morris 458 1/2 N. Spaulding Ave. Los Angeles, CA 90036-6305	X												X						X					X	
393	Adam Moysey 130 N. Gardner St. Los Angeles, CA 90036-2720	X													X										X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
394	Travis Muroki 427 N. Ogden Dr. Los Angeles, CA 90036-1710													X											X	
395	Ethan Murphy 531 N. Flores Ave. West Hollywood, CA 90048-6038	X																								
396	Thomas Murphy Marta Barbosa 351 1/2 N. Orange Grove Ave. Los Angeles, CA 90036-2147			X										X			X			X					X	
397	Paulette Nessim 10330 Rochester Ave. Los Angeles, CA 90024-5354																									X
398	Eric Netherland 438 N. Ogden Dr. Los Angeles, CA 90036-1769																			X					X	
399	Irene Nicolai 338 S. Citrus Ave. Los Angeles, CA 90036-3036	X		X					X	X										X					X	
400	Nima and Claudine 404 N. Harper Ave. Los Angeles, CA 0048-2221							X		X	X	X		X											X	
401	Steve Nori 458 N. Laurel Ave. Los Angeles, CA 90048-2351			X		X								X											X	
402	Aselle Nova 6270 Jackie Ave. Woodland Hills, CA 91367-1422																									X
403	Erik Oh 439 N. Vista St. Los Angeles, CA 90036-5742	X				X		X		X															X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support	
404	Sean O’Leary Calsak Plastics 19801 S. Rancho Way, Unit B Rancho Dominguez, CA 90220-6316																									X	
405	D. Ariela Olivas 611 N. Spaulding Ave. Los Angeles, CA 90036-1881			X																X						X	
406	Collin Olympius 1830 W. 36th St. Los Angeles, CA 90018-3813																									X	
407	Gerard Oropeza 20623 Lisa Gail Dr. Santa Clarita, CA 91350-1982	X					X													X						X	
408	Lisa Oropeza 7961 Blackburn Ave., Apt. 2 Los Angeles, CA 90048-4442																									X	
409	Allison Osario 908 N. Genesee Ave., Apt. 3 West Hollywood, CA 90046-7375																			X						X	
410	Conor O’Sullivan 457 1/2 N. Hayworth Ave. Los Angeles, CA 90048-2703			X										X						X						X	
411	Ara Ouzounyan ara.ouzounyan@tvcityla.com																									X	
412	Jason Paich 317 1/2 Stanley Ave. Los Angeles, CA 90036-2328			X			X		X					X												X	
413	Tracey Paleo 417 N. Gardner St. Los Angeles, CA 90036-5754			X										X						X						X	
414	Cathy Palmer 511 N. Fuller Ave. Los Angeles, CA 90036-1940			X										X						X		X				X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
415	Katrina Palmer 455 N. Ogden Dr. Los Angeles, CA 90036-1753	X											X	X			X								X	
416	James Panozzo LAUNCH LA 170 S. La Brea Ave. Los Angeles, CA 90036-3090																									X
417	Jun Park 7800 Beverly Blvd. Los Angeles, CA 90036-2112																								X	
418	Rosa Park 537 N. Croft Ave. West Hollywood, CA 90048																									X
419	Debra Pasquerette 325 N. Gardener St. Los Angeles, CA 90036-5715	X																							X	
420	Charles Paus 548 Spaulding Ave. Los Angeles, CA 90036-1808	X		X		X								X			X			X		X				
421	Jennifer Peagler 351 N. Sierra Bonita Ave. Los Angeles, CA 90036-2467																			X					X	
422	Ruth Peebles 142 S. Kilkea Dr. Los Angeles, CA 90048-3526	X																							X	
423	Tim Peng timpeng@kw.com																									X
424	Simone Perusse 101 N. Gardner St. Los Angeles, CA 90036-2719	X																							X	
425	Danielle Peters (undated first letter)	X					X	X			X				X		X			X					X	
426	Danielle Peters (undated second letter)			X																X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
427	Edward Petlak 174 S. Detroit St. Los Angeles, CA 90036-2914			X										X						X					X	
428	Michael Petruncola 603 N. Laurel Ave. Los Angeles, CA 90048-2320																			X						
429	Roderick Pinkney 4859 W. Slauson Ave., #137 Los Angeles, CA 90056-1290																									X
430	Devora Pinson 243 S. Formosa Ave. Los Angeles, CA 90036-2813	X					X																		X	
431	Yossi Pinson 243 S. Formosa Ave. Los Angeles, CA 90036-2813	X		X																X					X	
432	Todd Powers 569 N. Rossmore Ave. Los Angeles, CA 90004-2452																									X
433	David Purdie 451 N. Sierra Bonita Ave. Los Angeles, CA 90036-2471			X																X					X	
434	Adam Raeburn 451 N. Poinsettia Pl. Los Angeles, CA 90036-2504	X																		X					X	
435	Ali Rahimi 464 S. Mansfield Ave. Los Angeles, CA 90036-3516																			X					X	
436	Danielle Railla 341 N. Stanley Ave. Los Angeles, CA 90036-2398			X		X								X						X					X	
437	Gary Randall 139 S. Edinburgh Ave. Los Angeles, CA 90048-3605	X		X			X		X	X				X											X	
438	David Ravanshenas																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
439	Mimi Ravnoy 329 Fuller Ave. Los Angeles, CA 90036-2522					X		X												X					X	
440	Andrew Ray 530 N. Alta Vista Blvd. Los Angeles, CA 90036-1967	X																								
441	Ziggy Rees 1324 N. Spaulding Ave. Los Angeles, CA 90046-4010																									X
442	Alison Reeves 6253 Simpson Ave. North Hollywood, CA 91606-3415																									X
443	Leah Reichman 326 Vista St. Los Angeles, CA 90036-5739																			X					X	
444	Amy Reiley amy@lifeofreiley.com	X		X		X		X	X							X	X			X					X	
445	Cole Resnick 540 N. Croft Ave. Los Angeles, CA 90048-2545	X		X						X				X			X			X		X			X	
446	John Reuter 888 E. Walnut St. Pasadena, CA 91101-1895																									X
447	Jane Rhodes 517 Vista St. Los Angeles, CA 90036-5744														X										X	
448	Thomas Rice 437 1/2 N. Spaulding Ave. Los Angeles, CA 90036-2291																X			X					X	
449	Kate Richter 427 N. Alta Vista Blvd. Los Angeles, CA 90036-2540	X																							X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
450	Ken Ridnor 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
451	Matt Ritchley 417 N. Gardner St. Los Angeles, CA 90036-5754			X																X					X	
452	David Roa 302 S. Orange Dr. Los Angeles, CA 90036-3009																			X					X	
453	Beth Robbins 461 N. Harper Ave. Los Angeles, CA 90048-2220			X										X						X					X	
454	Michael Robertson 167 S. Vista St. Los Angeles, CA 90036-2707																			X					X	
455	Rena Ronson 418 N. Kilkea Dr. Los Angeles, CA 90048-2229			X			X													X					X	
456	Dan Rosenfeld danrosenfeld.la@gmail.com																									X
457	Rich Rossi 406 S. Citrus Ave. Los Angeles, CA 90036-3537																			X					X	
458	Esther Roth 609 S. Citrus Ave. Los Angeles, CA 90036-3534	X																							X	
459	Alex Rotsnansky aexerotsnansky47@gmail.com					X																			X	
460	Sabrina Rudolph 322 N. Harper Ave. Los Angeles, CA 90048-2219	X	X																	X					X	
461	Jane Ruhm 454 S. Mansfield Ave. Los Angeles, CA 90036-3516	X																							X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
462	Hayley Ruszecki 8250 W. Fourth St. Los Angeles, CA 90048-4402																								X	
463	Moshe Rather 364 N. Formosa Ave. Los Angeles, CA 90036-2527	X													X										X	
464	Rosanne Sachson P.O. Box 5864 Beverly Hills, CA 90209-5864																									X
465	Carole Sackley 6647 Drexel Ave. Los Angeles, CA 90048-4208	X																		X					X	
466	Jan Sacks 8371 W. Fourth St. Los Angeles, CA 90048-4202	X						X							X					X					X	
467	Shara Sahota 329 N. Gardener St. Los Angeles, CA 90036-5706			X						X		X								X						
468	Andrew Salazar andrew@technicolorprinting.com																									X
469	Dennis Salem 458 N. Curson Ave. Los Angeles, CA 90036-2325	X		X										X						X					X	
470	Emily Sallack 347 N. Kilkea Ave. Los Angeles, CA 90048-2226													X						X					X	
471	Berta Sandberg 543 N. Martel Ave. Los Angeles, CA 90036-1932	X		X										X						X					X	
472	Hannah Sanders 327 N. Stanley Ave. Los Angeles, CA 90036-2313																			X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
473	T. Sanders 323 S. Citrus Ave. Los Angeles, CA 90036-3035										X			X						X					X	
474	Patrick Sanderson 109 S. Kings Rd. Los Angeles, CA 90036	X				X														X					X	
475	Steven Sann 5551 W. Sixth St., Apt. 3224 Los Angeles, CA 90036-7511																									X
476	Yasmin Sarikaye 653 S. Citrus Ave. Los Angeles, CA 90036-3534	X																							X	
477	Vicki Saugstad vsaugstad@gmail.com												X												X	
478	Michael Sauk 5551 W. Sixth St., Apt. 3224 Los Angeles, CA 90036-7511																									X
479	Michael Scarnechia 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
480	Stephen Schiffrin 2260 Timberlane Ct. Oxnard, CA 93036-7716																									X
481	Samuel Schneerson 364 N. Fuller Ave. Los Angeles, CA 90036-2523			X		X							X												X	
482	Gladys Schreiber 212 S. Formosa Ave. Los Angeles, CA 90036-2814	X		X															X						X	
483	Sallo Schreiber 212 S. Formosa Ave. Los Angeles, CA 90036-2814			X										X						X					X	
484	Brian Schroeder brianschroeder10@gmail.com																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
485	Devorah Schwalb 351 N. Poinsettia Pl. Los Angeles, CA 90036-2506																			X					X	
486	Bayla Schwazmer 155 N. Detroit St. Los Angeles, CA 90036-2915					X														X					X	
487	Tuvia Schwarzmer 155 N. Detroit St. Los Angeles, CA 90036-2915	X																		X					X	
488	Jake Seevers 1843 S. Eighth St. Alhambra, CA 90021-2440																									X
489	Sussy Selbot 465 N. Curson Ave., Apt. 105 Los Angeles, CA 90036-2323	X																							X	
490	Richard J. Serino serinoconst@aol.com																									X
491	Mina Seroosh 330 N. Edinburg Ave. Los Angeles, CA 90048-2302			X																X						
492	Lisa Serratos 328 N. Orange Grove Ave. Los Angeles, CA 90048	X												X						X						
493	Chadaphea Sethik 7941 1/2 Blackburn Ave. Los Angeles, CA 90048-4417			X										X						X					X	
494	Mona Shaikh 934 N. Genesse Ave. West Hollywood, CA 90046-7346																			X					X	
495	Louise Shane 171 N. Fuller Ave. Los Angeles, CA 90036-2811			X					X																X	
496	Jerry and Evelyn Shapiro	X																		X					X	
497	Leonard Shapiro																			X						

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
498	Malka Shapiro 347 N. Detroit St. Los Angeles, CA 90036-2530					X																			X	
499	Al Shayne 153 S. Laurel Ave. Los Angeles, CA 90048-3513	X				X																			X	
500	Stephen Shiao 355 S. Citrus Ave. Los Angeles, CA 90036-3035	X		X																X		X			X	
501	Robert Shiell 853 S. Spaulding Ave. Los Angeles, CA 90036-4607																									X
502	Barton Shisoholha 8004 W. Fourth St., #5 Los Angeles, CA 90048-4450			X																X					X	
503	Ronald Shlesman 531 N. Alta Vista Blvd. Los Angeles, CA 90036-1966													X											X	
504	Elliot Shoenman 8256 W. Fourth St. Los Angeles, CA 90048-4402			X																X					X	
505	Linda Shoenman 8256 W. Fourth St. Los Angeles, CA 90048-4402																			X					X	
506	Linda Shoenman 8256 W. Fourth St. Los Angeles, CA 90048-4402	X						X							X					X					X	
507	Lena Shor 935 N. Genesee Ave., Apt. 3 West Hollywood, CA 90046-7348	X		X			X			X				X											X	
508	Gurinder Sidhu 537 Alandeale Ave. Los Angeles, CA 90036-3250																									X

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
509	Jacob Sidney 537 N. Orlando Ave., Apt. 5 Los Angeles, CA 90048-2530	X		X											X					X					X	
510	Pamela Silverman 750 S. Spaulding Ave., Apt. 101 Los Angeles, CA 90036-4551																									X
511	Lachap Simmans 6151 Blackburn Ave. Los Angeles, CA 90036									X												X			X	
512	Sizeifman 421 N. Poinsettia Pl. Los Angeles, CA 90036-2504			X																					X	
513	Fred Smillow 514 W. 26th St., Apt. 401 San Pedro, CA 90731-6386																									X
514	Ron Smith ronsmithproductions@gmail.com																									X
515	Leslie Sobel 428 N. Kilkea Dr. Los Angeles, CA 90048-2229			X																	X				X	
516	Marnin Somennan 6437 Lindenhurst Ave. Los Angeles, CA 90048-4731																									X
517	Erica Sommer 208 S. Formosa Ave. Los Angeles, CA 90036-2814	X																								
518	Nachum Saver 428 N. Detroit St. Los Angeles, CA 90036-2529	X																			X				X	
519	Lola Spector 612 N. Laurel Ave. Los Angeles, CA 90048-2321	X																							X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
520	Debra Spidell 464 S. Orange Dr. Los Angeles, CA 90036-3510	X																		X				X	X	
521	John Stamos 103 S. La Jolla Ave. Los Angeles, CA 90048-3529	X		X																					X	
522	Carlos Stancic 517 N. Hayworth Ave. Los Angeles, CA 90048-2705			X																X					X	
523	Sarah Stapanowich 439 N. Stanley Ave. Los Angeles, CA 90036-2301	X		X																X					X	
524	Andrew Starr 8380 W. Fourth St. Los Angeles, CA 90048-4203	X		X						X															X	
525	Mike Stein 300 S. Citrus Ave. Los Angeles, CA 90036-3036	X						X									X								X	
526	Alex Stemkovsky 839 S. Curson Ave. Los Angeles, CA 90036-4620																									X
527	Liz Sterbenz lizsterbenz@yahoo.com	X																		X					X	
528	Deborah Stern 6350 W. Fifth St. Los Angeles, CA 90048-4718					X																			X	
529	Josh Stock 639 N. Poinsettia Pl. Los Angeles, CA 90036-1926													X												
530	Sarai Stoermer 522 N. Poinsettia Pl. Los Angeles, CA 90036-1929																			X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
531	Cassio Stoltz 7803 Beverly Blvd. Los Angeles, CA 90036-2111																									X
532	Eric Stoltz 7803 1/2 Beverly Blvd. Los Angeles, CA 90036-2111																									X
533	Joe Stolz joestolz@hotmail.com																			X					X	
534	Sylvia Stone 6330 W. Fifth Street Los Angeles, CA 90048-4718																			X					X	
535	Etan Strauss-Cohn 313 N. Stanley Ave. Los Angeles, CA 90036-2328									X	X														X	
536	Ash Stuck and Tim Scales 542 N. Harper Ave. Los Angeles, CA 90048-2223									X										X					X	
537	James Sugahora 437 S. Orange Dr. Los Angeles, CA 90036-2611									X		X	X												X	
538	Bob Sullivan bobs2000@hotmail.com	X		X		X		X					X							X					X	
539	Otto Svoboda 2576 Nicholas St. Simi Valley, CA 93065-1515																									X
540	Kenya Swaye 4507 N. Radnor Ave. Lakewood, CA 90713-2550																									X
541	Fiona Tagliente 359 1/2 N. Gardner St. Los Angeles, CA 90036-5722			X																X					X	
542	Liat Tala 535 N. Fuller Ave. Los Angeles, CA 90036-1940			X																						

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
543	Jessica Tammariello 535 S. Curson Ave., Apt. 5B Los Angeles, CA 90036-5261																									X
544	Thomas Tanguay 350 S. Cloverdale Ave. Los Angeles, CA 90036-3472																									X
545	Debi Taub 357 N. Poinsettia Pl. Los Angeles, CA 90036-2506																			X					X	
546	Jack Taylor 541 1/2 N. Spaulding Ave. Los Angeles, CA 90036-1807	X																		X					X	
547	Julia Teweles 413 N. Sierra Bonita Ave. Los Angeles, CA 90036-2461																			X					X	
548	Elsa Thompson 534 N. Kilkea Dr. Los Angeles, CA 90048-2212	X			X		X							X						X					X	
549	John Thompson 7905 Melrose Ave. Los Angeles, CA 90046-7109																									X
550	Kevin Thulin 146 N. Fuller Ave. Los Angeles, CA 90036-2812																			X				X	X	X
551	Vall Tirsoaga 1830 W. 36th St. Los Angeles, CA 90018-3813	X																								X
552	Josh and Rachel Tomaszewski 162 S. Alta Vista Blvd. Los Angeles, CA 90036-2824			X																X					X	
553	Elena Topoozian 631 N. Las Palmas Ave. Los Angeles, CA 90004-1019					X							X												X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
554	Marco Torres 6322 W. Slauson Ave. Culver City, CA 90230-6126																									X
555	Sarah Torres 603 S. Citrus Ave. Los Angeles, CA 90036-3534	X																		X					X	
556	Amy Townsend 118 N. Kilkea Dr. Los Angeles, CA 0048-3524	X												X						X						
557	Ann Trank 465 N. Gardner St. Los Angeles, CA 90036-5708																			X					X	
558	Karen Tsai 6206 W. Fifth St. Los Angeles, CA 90048-4726																			X					X	
559	Mark Tuohy 101 S. Kilkea Dr. Los Angeles, CA 90048-3525																			X					X	
560	Mary Ann Turkmany maturkmany@icloud.com																								X	
561	Arnold Turner aturnerarchives1@gmail.com																									X
562	Sher Unger 358 N. Gardner St. Los Angeles, CA 90036-5721	X																		X					X	
563	Alfred Union 336 N. Detroit St. Los Angeles, CA 90036-2531	X																							X	
564	Debra Union 336 N. Detroit St. Los Angeles, CA 90036-2531	X																		X					X	
565	Pauline Van Keulen 548 N. Spaulding Ave. Los Angeles, CA 90036-1808																			X						

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
566	Henry van Mayland 546 S. Curson Ave. Los Angeles, CA 90036-3253																									X
567	Sam Van Wagemen 8139 Blackburn Ave. Los Angeles, CA 90048-4423	X																							X	
568	Amelia Vargas 358 N. Ogden Dr. Los Angeles, CA 90036-2163	X																							X	
569	Rob Vautherine 7800 Beverly Blvd. Los Angeles, CA 90036-2112																									X
570	Rochelle Ventura 6236 W. Fifth St. Los Angeles, CA 90048-4726																									X
571	Ryan Vermilion 401 W. Ogden Dr. Los Angeles, CA 90036-1735	X																		X					X	
572	Greg Wachs																			X					X	
573	Shelley Wagers 6507 W. Fifth St. Los Angeles, CA 90048-4711	X						X			X									X					X	
574	Elaine Waldman elainejulie.waldman@gmail.com													X											X	
575	Michelle Wang 439 1/2 N. Stanley Ave. Los Angeles, CA 90036-2301													X						X					X	
576	John Ward 156 S. Gardner St. Los Angeles, CA 90036-2718																								X	
577	Margalete Ward 156 S. Gardner St. Los Angeles, CA 90036-2718	X																							X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
578	Deryn Warren 166 N. Fuller Ave. Los Angeles, CA 90036-2812																			X					X	
579	Michael Warrenbarger 345 N. Fuller Ave. Los Angeles, CA 90036-2522			X																						
580	Andrew Watnich 941 N. Genesee Ave. West Hollywood, CA 90046-7347																			X					X	
581	Rosalie Wayne 8140 Blackburn Ave. Los Angeles, CA 90048-4424	X						X							X					X					X	
582	Emma C. Webster 335 S. Orange Dr. Los Angeles, CA 90036-3008			X						X	X									X		X			X	
583	Nick Wechsler 347 N. Gardner St. Los Angeles, CA 90036-5700	X																							X	
584	Douglas Weinstein bakeryoperations@diamondbakeryla.com																									X
585	Ahuva Weisbaum 8318 W. Fourth St. Los Angeles, CA 90048-4203	X		X																X					X	
586	Roland White 12408 Lemay St. North Hollywood, CA 91606-1358																									X
587	Thayer Wiederhorn																			X						
588	Anne Williams 157 N. Gardner St. Los Angeles, CA 90036-2719	X																							X	
589	James Williams Marc Wenderoff 6410 W. Fifth St. Los Angeles, CA 90048-4710	X			X		X							X						X					X	

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
590	Barbara Wilson 144 N. Detroit St. Los Angeles, CA 90036-2916	X												X						X					X	
591	Justin Wilson 144 N. Detroit St. Los Angeles, CA 90036-2916	X																							X	
592	Kathy Wilson 104 N. Orange Dr. Los Angeles, CA 90036-3015																									X
593	Rachel Wilson 7309 Atoll Ave. North Hollywood, CA 91605-4107																									X
594	Paul Witt Deborah Welsh Mindy Lake West 3rd Street Business Association 119 N. Fairfax Ave., #246 Los Angeles, CA 90036-2110																									X
595	C. Wittenberg 318 S. Mansfield Ave. Los Angeles, CA 0036-3057	X								X	X														X	
596	Caroline Witts 537 N. Orlando Ave. West Hollywood, CA 90048-2530																			X					X	
597	Tim Wong 1211 Graynold Ave. Glendale, CA 91202-2020																									X
598	Mari Worden 7924 W. Fourth St. Los Angeles, CA 90048-4413																			X					X	
599	Michael Wyatt 319 N. Ogden Dr. Los Angeles, CA 90036-2133			X										X						X						

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

Letter No.	Commenter	Project Description	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Alternatives	General/Other	Support
600	Sofia Yazpik 441 N. Orange Grove Ave. Los Angeles, CA 90036-1708			X													X	X	X	X					X	
601	Bilal Young 1758 N. Orange Dr. Los Angeles, CA 90028-4374																									X
602	David Young 441 1/2 N. Ogden Dr. Los Angeles, CA 90036-1748			X		X								X											X	
603	Shirley Zadaca 454 N. Kilkea Dr. Los Angeles, CA 90048-2229	X																		X					X	
604	Tamar Zadaca 454 N. Kilkea Dr. Los Angeles, CA 90048-2229	X																							X	
605	Daniel Zeanel 327 N. Formosa Ave. Los Angeles, CA 90036-2526	X				X								X						X					X	
606	Patricia Zehentmayr 6650 W. Fifth St. Los Angeles, CA 90048-4602	X																							X	
607	Michael Zimmerfeld 163 N. Poinsettia Pl. Los Angeles, CA 90036	X																							X	
608	Louis Zogaib 8747 Clifton Way, Apt. 303 Beverly Hills, CA 90211-2125																									X

III. Responses to Comments

C. Topical Responses

Topical Response No. 1. Clearly Defined Project Description and Specific Plan

As stated consistently throughout the Initial Study, Draft EIR, and Final EIR, the TVC 2050 Project (Project) is a studio project. The Project includes the establishment of the TVC 2050 Specific Plan (Specific Plan) to continue the existing studio use and modernize and expand production facilities within Television City. The purpose of the proposed Specific Plan is to implement the Project or a Project alternative as described in the EIR or a modified Project. An approved site plan will be included as Exhibit A to the approved Specific Plan. As discussed below, the Project Description in the Draft EIR includes all information required by CEQA and fulfills CEQA's purpose as an informational document that allows for meaningful public participation. Neither CEQA nor City policy requires a draft of a proposed specific plan or sign district to be included in an EIR. Nevertheless, in response to comments on the Draft EIR, the current draft of the proposed Specific Plan (also referred to herein as the Preliminary Draft Specific Plan) has been made publicly available for informational purposes on the Department of City Planning website prior to the release of this Final EIR. Additionally, the proposed Sign District (also referred to herein as the Preliminary Draft Sign District), will be made publicly available for informational purposes on the Department of City Planning website prior to the first public hearing held for the Project. Please note that any documents referred to as drafts are not final and have not been approved or adopted by City decision-makers.

A. The Project Description Conforms with CEQA

Commenters state that the Draft EIR does not include a description of the Project, or that the Project description is incomplete or inadequate. Commenters also state that the Project Description does not include sufficient detail, or that information about the Project is difficult to find within the Draft EIR. However, as stated on the first page of Section II, Project Description, of the Draft EIR (page II-1) and throughout the Draft EIR:

The TVC 2050 Project (Project) would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 25-acre Television City studio located at 7716–7860 West Beverly Boulevard in Los Angeles, California (Project Site). The proposed

Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space.

A detailed description of the Project is included on pages II-12 to II-35 of the Draft EIR. Table II-2 on page II-13 of the Draft EIR, replicated below, provides a land use and floor area breakdown of the proposed development program that was analyzed in the Draft EIR. The massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*.

**Draft EIR Table II-2
Proposed Development Program**

Use	Existing (sf)	Demolition (sf)	Existing to Remain (sf)	Proposed New Construction (sf)	Total Permitted (sf)	Net Change (sf)
Sound Stages	95,540	41,360	54,180	295,820	350,000	+254,460
Production Support	325,450	302,340	23,110	80,890	104,000	-221,450
Production Office	163,090	98,490	64,600	635,400	700,000	+536,910
General Office	159,600	53,670	105,930	594,070	700,000	+540,400
Retail	0	0	0	20,000	20,000	+20,000
Total	743,680	495,860	247,820	1,626,180	1,874,000	1,130,320
<i>sf = square feet</i> <i>Source: TVC 2050 Draft EIR, July 2022.</i>						

Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Contrary to commenters' assertions, the Project Description in the Draft EIR includes all information required by CEQA. With respect to an EIR project description, four

items are mandatory under CEQA Guidelines Section 15124: (1) the precise location and boundaries of the proposed project shown on a detailed map, preferably topographic, and on a regional map; (2) a statement of the objectives sought by the proposed project, which should include the underlying purpose of the project and may discuss the project benefits; (3) a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities; and (4) a statement briefly describing the intended uses of the EIR. Aside from these four items, the CEQA Guidelines advise that the project description should not "supply extensive detail beyond that needed for evaluation and review of the [project's] environmental impact."¹

In accordance with CEQA Guidelines Section 15124, the Project Description includes the following:

- (1) The precise location and boundaries of the proposed Project is shown on a detailed map, Figure II-2, Aerial Photograph of the Project Vicinity, in Section II, Project Description, of the Draft EIR. The location of the Project also appears on a regional map in Figure II-1, Project Location Map.
- (2) A clearly written statement of the objectives sought by the proposed Project begins on page II-10 in Section II, Project Description, of the Draft EIR. As noted on page II-10, the statement of objectives includes the underlying purpose of the Project.
- (3) A general description of the Project's technical, economic, and environmental characteristics is included in Section II, Project Description, of the Draft EIR.
- (4) A statement briefly describing the intended uses of the EIR that includes a list of the agencies that are expected to use the EIR in their decision making and a list of permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies is included in Section 6, Requested Permits and Approvals, on page II-35 of the Draft EIR.

As such, the Project Description includes all information required by CEQA Guidelines Section 15124.

¹ CEQA Guidelines § 15124.

B. The Project Description Includes Sufficient Information and Detail to Evaluate the Project's Environmental Impacts

Comments state that the Draft EIR does not include sufficient information or details about the Project and that therefore the Draft EIR failed to analyze the environmental impacts of the Project. CEQA requires a “general description” of the Project’s technical, economic and environmental characteristics. “General” means involving only the main features of something rather than details or particulars.² CEQA Guidelines Section 15124 specifically provides that a project description “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.” Rather, the project description need only disclose the nature of the project and its main features. This is consistent with CEQA Guidelines Section 15161, which provides that a project EIR like the TVC EIR “should focus primarily on the changes in the environment that would result from the development project.”

The nature of the Project is the modernization and expansion of an existing studio pursuant to the proposed Specific Plan, which will permit five land uses (i.e., sound stage, production support, production office, general office, and retail).³ Section II, Project Description, of the Draft EIR sufficiently describes the proposed Project and provides additional information such as the requested entitlements, including the proposed Specific Plan and Sign District, among others. The Project Description also discusses permitted and proposed floor area; proposed development program; Land Use Exchange Program; design and architecture; height zones; frontage areas (similar to setbacks); building setbacks; other design elements including screening and fencing; historic preservation elements; open space; landscaping; public realm enhancements; access; circulation; parking; lighting; signage; site security; sustainability features; anticipated construction schedule; earthwork activities; and haul routes. Additional information about the Project is

² The “general description” requirement for the technical attributes of a project is consistent with other CEQA mandates to make the EIR a user-friendly document. For example, CEQA Guidelines Section 15140 states that EIRs must be written in plain language so that decision makers and the public can rapidly understand them. The general description requirement also fosters the principle that EIRs should be prepared early enough in the planning stages of a project to enable environmental concerns to influence the project’s design.” A general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amenable to modification to reflect environmental concerns.

³ These uses are defined in the Preliminary Draft Specific Plan.

included in the impact analysis sections where relevant to a particular environmental topic and impact analysis.⁴

As discussed above, the Project includes height zones, building setbacks, and frontage areas that will dictate the location, orientation, mass, and height of potential future buildings. Specific details about potential future buildings are unknown at this time but would not change the overall development limits set forth in the Project Description and those in the proposed Specific Plan. The Specific Plan would only allow for development consistent with the parameters described in the Draft EIR and would require future review by the City for conformance with the Certified EIR and the Specific Plan. The Specific Plan will outline, among other things, the required process for future review by the City.

In accordance with CEQA, all environmental aspects of the Project (i.e., all aspects that may cause a physical impact on the environment), including, among other Project approvals, the proposed Specific Plan and Sign District, were fully disclosed and analyzed in the Draft EIR, including an assessment of the maximum potential impacts of Project buildout. For example, a discussion of the elements of the proposed Specific Plan and Sign District that are relevant to the land use impact analysis is included in Section IV.H, Land Use and Planning, of the Draft EIR. Specifically, the relevant proposed Specific Plan regulations are discussed on pages IV.H-20 through IV.H-30 of the Draft EIR, including permitted land uses; Land Use Exchange Program; height zones; design regulations, including regulations related to frontage areas, building setbacks, screening of rooftop equipment and outdoor storage areas, fencing, parking structures, and Project Site access points; historic preservation regulations; parking; alcohol sales; and childcare facilities. The relevant proposed Sign District elements, as well as the 23-page Historic Sign Guidelines for the Primary Studio Complex, which is included in Appendix C of the Draft EIR, are discussed on pages IV.H-30 through IV.H-31 of the Draft EIR. In addition, the public realm improvements proposed as part of the Project, which are also relevant to the land use analysis, are discussed on pages IV.H-31 through IV.H-37 of the Draft EIR. Regarding the proposed Development Agreement, the component of the Development Agreement that is relevant to the environmental analysis is the 20-year term, which could extend buildout of

⁴ For example, relevant to commenters' concern that the Project Description lacks sufficient information about the Project's transportation impacts, the Draft EIR includes a transportation section (Section IV.K) and an appendix (i.e., Appendix M) that includes the Los Angeles Department of Transportation (LADOT)-approved transportation assessment, the LADOT transportation assessment letter for the transportation assessment, the supplemental vehicle miles traveled (VMT analysis memo, the LADOT assessment letter for the supplemental VMT analysis memo, and the LADOT haul route approval letter. The Project characteristics that are relevant to the transportation impact analysis, including the proposed development program, Land Use Exchange Program, construction timeline, vehicular and pedestrian access, circulation, parking, Transportation Demand Management (TDM) Program and Mobility Hub, are discussed on pages IV.K-41 through IV.K-45 as well as throughout the impact analysis on pages IV.K-45 through IV.K-83.

the Project to approximately 2043. The Draft EIR conservatively assumed a 32-month construction duration that includes overlapping activities and construction phases and more intense activities on a daily basis. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR.

For further information, please refer to the Comparison Chart of Draft EIR and the Preliminary Draft Specific Plan included as Appendix FEIR-2, which includes a comparison of the Project elements disclosed in the Draft EIR with the proposed Specific Plan.

C. Level of Detail Required for a Specific Plan Project EIR

A specific plan is a “regulatory land use ordinance” that provides “regulatory controls or incentives for the systematic execution of the General Plan.”⁵ The main purpose of a specific plan is to provide a supplemental layer of development regulations that are more responsive and tailored to the existing conditions of a site than the base zoning regulations. Specific plans go beyond the underlying zoning to establish additional regulations that enhance and preserve the unique characteristics of a distinct site or community. Per the California Governor’s Office of Planning and Research (OPR), a specific plan “effectively establishes a link between implementing policies of the general plan and the individual development proposals in a defined area. A specific plan may be as general as setting forth broad policy concepts, or as detailed as providing direction to every facet of development from the type, location, and intensity of uses to the design and capacity of infrastructure; from the resources used to finance public improvements to the design guidelines of a subdivision.”⁶

“In unique areas and developments, a specific plan can provide zoning regulations where conventional zoning districts may not achieve the desired planning results. In some circumstances, the proposed specific plans may be less restrictive than the current code but in some circumstances they are more restrictive.”⁷

⁵ LAMC § 11.5.7(A) [13B.4.1(A)(1)].

⁶ California Governor’s Office of Planning and Research, The Planner’s Guide to Specific Plans, January 2001, www.ca-ilg.org/sites/main/files/file-attachments/resources__specific_plans_0.pdf?1350954879, accessed May 31, 2023.

⁷ NBC Universal Evolution Plan Final Impact Report (Case No. ENV-2007-0254-EIR dated July 2012), Section III, Responses to Comments.

Under CEQA, the level of detail required in an EIR is dependent upon the underlying project. Per CEQA Guidelines Section 15146, “[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” Accordingly, less detail is required for a specific plan project than an individual building development project. Section 15146(a) states that “[a]n EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.” Per OPR’s The Planner’s Guide to Specific Plans dated January 2001 (OPR Guide), “[a]s the name implies, a specific plan EIR should contain analyses specific enough to reflect the level of detail in the plan (CEQA Guidelines § 15146).”⁸ As stated in the OPR Guide, the “information contained in this document is meant to provide direction and references to planning practitioners for the development of specific plans.”⁹ The Draft EIR discusses all of the physical elements of the proposed Specific Plan in the same amount of detail as the Preliminary Draft Specific Plan and complies with CEQA requirements.¹⁰

D. CEQA and City Policy Do Not Require the Proposed Specific Plan or Sign District to be Included in the EIR

Comments claim that because the proposed Specific Plan and Sign District were not included in the Draft EIR, the Draft EIR failed to adequately define the Project and analyze its environmental impacts. However, these comments misconstrue CEQA’s definition of a “project.” CEQA defines the “project” to be analyzed in the EIR as the “physical change in the environment,” not the regulatory document describing that change.¹¹ CEQA Guidelines Section 15378(c) states that “[t]he term ‘project’ refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term ‘project’ does not mean each separate governmental approval.” This is consistent with the OPR Guide, which states that, “[t]o the extent feasible, the process of preparing the specific plan and the environmental analysis should proceed concurrently because both documents require many of the same studies and resulting information. The information in the EIR provides decision makers with the insight necessary to guide policy

⁸ OPR Guide, p. 23.

⁹ OPR Guide, p 3.

¹⁰ Please refer to the Comparison Chart of Draft EIR and the Proposed Specific Plan included as Appendix FEIR-2, which includes a comparison of the Project elements disclosed in the Draft EIR with the Preliminary Draft Specific Plan that confirms that all necessary Project elements were discussed and analyzed in the Draft EIR.

¹¹ Public Resources Code § 21065. Per CEQA Guidelines § 15378(a), “project” means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.”

development, thereby ensuring the plan's policies will address and provide the means by which to avoid potential impacts to the environment.”¹² Further, pursuant to CEQA Guidelines Section 15358, the environmental “effects” and “impacts” analyzed under CEQA “must be related to a physical change.” Under this definition of a project, the lead agency must describe the project to encompass the entirety of the activity that is proposed for approval, which ensures that all potential impacts of the proposed project will be examined before it is approved.¹³ The Draft EIR fully complies with this requirement. As described on page I-1 in Section I, Executive Summary, of the Draft EIR, “[t]his Draft EIR serves as the environmental document for all actions associated with the Project.” The environmental topics analyzed in the Draft EIR include air quality; cultural resources; energy; geology and soils; greenhouse gas (GHG) emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (including fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (including water supply and infrastructure, wastewater, and electric power, natural gas, and telecommunications infrastructure).¹⁴

The Draft EIR analyzed all potentially significant environmental impacts of the proposed Project as required by CEQA, including the components of each entitlement that could have a physical impact on the environment. As stated above, per CEQA Guidelines Section 15161, the EIR “should focus primarily on the changes in the environment that would result from the development project.” Although CEQA requires that a project description include a list of the entitlements sought, CEQA does not require the entitlements themselves to be included in the EIR; rather, what CEQA requires is an analysis of all physical environmental impacts associated with a project. The Draft EIR lists the Specific Plan and Sign District, among others, as entitlements associated with the Project, and the Draft EIR comprehensively analyzes the potential environmental impacts associated with all proposed entitlements.

Although not required by CEQA or City policy, a Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website prior to the release of this Final EIR. Additionally, a Preliminary Draft Sign District will be made publicly available for informational purposes on the Department of City Planning website prior to the first public hearing held for the Project. Please note that any documents referred to as drafts are not final and have not been approved or adopted by City decision-makers.

¹² OPR Guide, p. 23.

¹³ CEQA Guidelines § 15378.

¹⁴ Please refer to Appendix FEIR-3, Maximum Impact Scenario, which discusses the maximum impact scenarios that were analyzed for each environmental topic.

E. Land Use Exchange Program

The Land Use Exchange Program will be included in the Specific Plan and will be consistent with the Project Description and analysis in the EIR. As shown in Table II-2 on page II-13 of the Draft EIR and replicated on page II-62 of this Topical Response, the proposed development program includes 350,000 square feet of sound stages, 104,000 square feet of production support, 700,000 square feet of production office, 700,000 square feet of general office, and 20,000 square feet of retail for a total of 1,874,000 square feet. Under the Land Use Exchange Program, the amount of sound stage may be increased up to a maximum of 450,000 square feet, and production support may be increased up to a maximum of 450,000 square feet, in exchange for an equivalent decrease in the floor area of any of the other permitted land uses (individually or in combination). The Land Use Exchange Program would not allow for increases in production office, general office, or retail floor area. Please note that the sound stage and production support floor area would likely not both be maximized at 450,000 square feet each in practice, because this would not allow for an operationally feasible amount of production office and general office space. The Land Use Exchange Program analyzed in the Draft EIR is identical to the program in the Preliminary Draft Specific Plan, except that, in response to comments, the program in the Final EIR and Preliminary Draft Specific Plan were clarified to limit production support floor area to a maximum of 450,000 square feet (there was no maximum limit in the Draft EIR). Therefore, the Land Use Exchange Program in the Preliminary Draft Specific Plan, which limits sound stage and production support floor area to a maximum of 450,000 square feet each, is more restrictive than the program analyzed in the Draft EIR. This change does not affect any of the environmental analyses or impact conclusions in the Draft EIR.

The Draft EIR's environmental analysis accounts for the maximum potential environmental impacts associated with Project buildout. For each environmental topic, as applicable, in addition to analyzing the impacts of the proposed development program, the Draft EIR also analyzes the maximum impact scenario; i.e., the development scenario under the Land Use Exchange Program that would generate the maximum impact for each environmental topic. Please refer to Appendix FEIR-3, Maximum Impact Scenario, which discusses the maximum impact scenarios that were analyzed for each environmental topic. For example, as discussed in Section IV.A, Air Quality, of the Draft EIR, with regard to air quality impacts during construction, the overall square footage of development and earthwork activities would remain the same with the proposed development program and any potential buildout scenario under the proposed Specific Plan Land Use Exchange Program; as such, the construction emissions associated with the proposed development program, which are included on page IV.A-63 of the Draft EIR, are representative of all potential development scenarios under the proposed Specific Plan. However, with respect to air quality impacts during operation, the proposed development program does not represent the greatest potential impacts. Rather, the maximum air quality impacts during

operations would be generated by a buildout scenario that exchanges 100,000 square feet of production support for 100,000 square feet of sound stages under the Land Use Exchange Program, which is what was analyzed in the Draft EIR (see Tables IV.A-7 and IV.A-10 on pages IV.A-64 and IV.A-70 of the Draft EIR, respectively). Further, any land use exchange scenario would be required to comply with all other Specific Plan regulations, including, among others, height limitations, frontage and setback requirements, and the project parameters for construction on or adjacent to the Primary Studio Complex (Project Design Feature CUL-PDF-1, discussed in Topical Response No. 5, Historical Resources).

Under the proposed Specific Plan, a future development proposal that involves a land use exchange would require additional discretionary City review and approval and potential CEQA compliance review. The maximum potential impacts of the Project were evaluated in the Draft EIR and represent the measure against which future land use exchange proposals may be considered.

F. The Project Description Is Accurate, Stable and Finite

Comments state that the Project fails to meet CEQA's requirement of an accurate, stable and finite description of the Project.

However, the Project Description in the Draft EIR is indeed accurate, stable and finite, and contains all necessary data to evaluate and determine the potential environmental impacts of the proposed Project.¹⁵ The Project is intended to allow for the continuation and modernization of a working studio that is over 70 years old; there is no uncertainty that this site will remain a studio use, and all of the elements of the proposed Project are intended to support this overarching goal. Precise architectural drawings for individual buildings, building floor plans, landscape plans and building material specifications are details that are not currently available and are not required to be included as part of a draft EIR for a specific plan project. In fact, technical drawings may well supply extensive detail beyond that needed for evaluation and review of the environmental impact in violation of CEQA Guidelines Section 15124. Notwithstanding, Project information specific to individual issue area analyses is appropriately located in the corresponding EIR sections or technical appendices of the Draft EIR.

¹⁵ Please refer to the Comparison Chart of Draft EIR and the Proposed Specific Plan included as Appendix FEIR-2 for a comparison of the Project elements disclosed in the Draft EIR with the Preliminary Draft Specific Plan that confirms that all necessary Project elements were discussed and analyzed in the Draft EIR.

A project EIR for a long-range development plan that included a conceptual development scenario rather than precise building plans is consistent with CEQA and City policy, as an EIR cannot be faulted for not providing detail that, due to the nature of the Project, simply does not now exist. The nature of the Project is a proposed specific plan and the Draft EIR evaluated a conceptual development scenario, as a specific development plan did not exist when the Draft EIR was prepared. As discussed above, the Draft EIR includes a description of all aspects of the proposed Specific Plan, proposed Sign District, and other Project components which are relevant to the environmental analysis, including an assessment of the maximum potential impacts of Project buildout. Under CEQA, a project description is adequate where the basic characteristics of the project remained accurate, stable and finite (i.e., the integral components of the project have not changed in any material way). Accordingly, the Project Description is accurate, stable, and finite in compliance with CEQA requirements.

***Millennium* is Distinguishable**

Commenters attempt to equate the Project with the project in *Stopthemillennium hollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1 (“*Millennium*”). However, the project at issue in the *Millennium* case is not similar to the Project because *Millennium* involved an individual building development project rather than a specific plan project. In addition, the Project Description is distinguishable in all material respects from the project description at issue in *Millennium*.

The Draft EIR in *Millennium* described a “mixed-use development” that would include “some combination of residential dwelling units, luxury hotel rooms, office and associated uses, restaurant space, health and fitness center uses, and retail establishments.”¹⁶ The *Millennium* project description did not specify what uses would be built or the square footage or location of such uses. The court ruled that the *Millennium* project description did not include “any description or detail regarding what *Millennium* intended to build,” and the “lack of detail about what [the project] would look like and what uses would be built continued throughout the environmental review process.”¹⁷

The Draft EIR, on the other hand, clearly and consistently states that the Project is a studio specific plan project that will include sound stage, production support, production office, general office, and retail uses. The *Millennium* project did not include any limit on the size of the various permitted uses that could be built. The proposed Specific Plan, in contrast, includes maximum limits on the size of the five permitted land uses, in addition to

¹⁶ *Millennium*, 39 Cal.App.5th at 6; Hollywood Center Project Draft EIR (Case No. ENV-2018-2116-EIR), Section I, Introduction/Summary, p. I-5.

¹⁷ *Millennium*, 39 Cal.App.5th at 8.

the overall floor area limitation of 1,874,000 square feet. Specifically, consistent with the Project Description in the Draft and Final EIR, the Preliminary Draft Specific Plan limits the floor area of the five permitted studio land uses as follows:

- Sound stage would be limited to a maximum of 350,000 square feet, which could be increased up to 450,000 square feet under the Land Use Exchange Program.
- Production support would be limited to a maximum of 104,000 square feet, which could be increased up to 450,000 square feet under the Land Use Exchange Program.
- Production office would be limited to a maximum of 700,000 square feet.
- General office would be limited to a maximum of 700,000 square feet.
- Retail would be limited to a maximum of 20,000 square feet.
- Total Project floor area would be limited to 1,874,000 square feet or a floor area ratio (FAR) of 1:75.

Further, even though the Project is not an individual building project like the *Millennium* project, the EIR provides plans and information beyond what CEQA requires for a specific plan project EIR and far beyond what was provided in the *Millennium* EIR. Unlike in *Millennium*, a detailed discussion of the Project is included on pages II-12 to II-35 of the Draft EIR. Table II-2 on page II-13 of the Draft EIR, replicated on page II-62 of this Topical Response for reference, provides the land use and floor area breakdown of the proposed development program that was analyzed in the Draft EIR. The massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*.

Unlike in *Millennium*, the Project is not seeking flexibility with respect to the nature of the Project, what uses may be built, and the overall size of the Project, as the proposed studio uses and the overall size of the Project are defined and fixed elements of the Project. The Project would allow for limited flexibility in the size and placement of the permitted studio uses, as is typical with a studio specific plan. Even for an individual building project, changes in the size and siting of a defined set of proposed land uses within a defined development footprint do not render a project description unstable.

Commenters claim that, as in *Millennium*, the TVC 2050 Draft EIR merely analyzed a set of environmental impact envelopes in violation of CEQA, which is incorrect. In

Millennium, the draft EIR described a mixed-use project that would consist of an undisclosed combination of various commercial and/or residential uses, and project development would be regulated based on environmental impact envelopes rather than specific development standards. As the Second District Court of Appeal in *Millennium* stated, “[a]nalyzing a ‘set of environmental impact limits,’ instead of analyzing the environmental impacts for a defined project, was not consistent with CEQA.” By contrast, the TVC 2050 Draft EIR analyzed the environmental impacts of the Project.

The TVC 2050 Draft EIR analyzed the “proposed development program” (Conceptual Site Plan) with the five permitted land uses set forth in Table II-2 on page II-13, replicated on page II-62 of this Topical Response. As discussed in Section E, above, the Draft EIR also analyzed maximum impact scenarios, in which the Land Use Exchange Program would enable a potential land use mix that would have a greater environmental impact than the Conceptual Site Plan, specific to the maximum impact per environmental impact category; e.g., transportation, energy, air quality, etc. Therefore, in accordance with CEQA, the EIR’s focus on the maximum impacts expected to occur at full buildout promotes informed decision making, and evidences a good faith effort at forecasting what is expected to occur if the Project is approved. As such, the Draft EIR comprehensively evaluated and disclosed the maximum potential impacts of the Project.

Further, unlike in *Millennium*, future development of the Project Site will be subject to the review procedures under the proposed Specific Plan and Los Angeles Municipal Code (LAMC) Section 11.5.7[13B.4]. As required, any future development that is substantially different than the proposed Project, or which is beyond the scope of the impacts evaluated in the EIR, would be subject to additional discretionary City review and approval, as well as additional CEQA compliance review.

Contrary to commenters’ claims, detailed and technical plans are not required for purposes of a specific plan project EIR, and illustrative and conceptual plans are the only plans that could meaningfully be provided when a draft EIR is prepared. As discussed above, a CEQA project description need only disclose the nature of the project and its main features. In addition, [t]he degree of specificity required depends on the type of project. There must be sufficient information to understand the environmental impacts of the proposed project. The EIR must achieve a balance between technical accuracy and public understanding. The fact that the site plan and other figures in the Project Description are labeled as “conceptual” and/or “illustrative” does not render the Project Description unstable or not finite. There is no provision under CEQA that requires a conceptual site plan for a specific plan project to identify the precise location and use of each building as requested by the commenters, and the detailed construction plans for future development under the Specific Plan will not be created until after the adoption of the Specific Plan during the building permit process.

Any plans included in an EIR or other CEQA document are inherently conceptual, and approved plans would be further finalized during the building permit process, which would occur after a project's EIR is certified. A general description of project elements in the EIR, followed by detailed design plans once a project is approved, is consistent with CEQA. The Draft and Final EIR for the Project provides the detail required by CEQA, and the Project is subject to mandated review processes by the City for future implementation. Further, the label given to a plan set has no bearing on how much detail is provided.

Contrary to commenters' assertions, under CEQA, flexibility with respect to the size of the proposed uses does not render a project description unstable where the basic characteristics of the Project remain the same. This is true even for individual building project EIRs. For example, an individual building project EIR that includes various alternative compositions for a proposed residential and commercial mixed-use project all within a defined project footprint, where the only changes involve the building composition and ratio of the residential to commercial footprint, but the overall size of the project and the project site remain the same, is accurate, stable, and finite. Further, even if the project that was ultimately approved had a different mix of residential and commercial uses than the project and project alternatives studied in the EIR, the project description would still be stable if the final project was not so significantly different from the project and project alternatives analyzed in the EIR, and CEQA would not require recirculation or an opportunity for the public to comment on the actual specific project that was approved but not included in the EIR circulated for comment. Thus, even if an approved project contains a different mix of uses than the permutations studied in the EIR, under the example above, the project definition is sufficiently accurate and stable because the approved project retained the same basic components within the same maximum analyzed parameters.

Commenters incorrectly claim that the proposed Land Use Exchange Program renders the Project Description inaccurate and unstable. The Land Use Exchange Program described in the Draft EIR and detailed in the Preliminary Draft Specific Plan demonstrates that if sound stage and/or production support floor area is added, then an equivalent amount of floor area from another permitted land use(s) is subtracted. Further, sound stage and production support uses are symbiotic; that is, sound stages require production support, so increases in sound stages means increases in production support area. Accordingly, like the example discussed above, even though the mix of the proposed uses may vary, the Project includes the same basic components within the maximum parameters analyzed in the EIR.

The Draft EIR analyzed the proposed development project, as well as the maximum impact scenarios to account for the full range of impacts under the Project. This range of impact analyses for a mix of project scenarios will account for the impacts of any final project that was not specifically analyzed in the Draft EIR because such a project would be sufficiently similar to the programs analyzed in the Draft EIR, will conform with the Land

Use Exchange Program evaluated in the EIR, and would not exceed the impacts identified in the EIR.

The Draft EIR disclosed and analyzed all physical elements of the Project that would be implemented by the proposed Specific Plan. The proposed Specific Plan would allow for limited flexibility in the placement and massing of future buildings consistent with the Conceptual Site Plan and the EIR, while providing clearly defined development parameters that would limit permitted land uses, floor area, building heights and setbacks, among many other things. The Draft EIR detailed the basic characteristics of the Project and analyzed the maximum scope of potential impacts of the Project. As discussed above, the proposed Specific Plan requires that future discretionary City review and approval and subsequent CEQA compliance review be conducted for any substantial changes to the proposed Project.

G. Environmental Review Is Not Premature

Comments state that environmental review is premature because there is no draft Specific Plan or Sign District. These comments, however, misrepresent CEQA's purpose. A fundamental principle of CEQA is that EIRs should be prepared as early as feasible in the planning process.¹⁸ CEQA requires a "general description" of the project, which fosters the principle that EIRs should be prepared early enough in the planning stages of a project to enable environmental concerns to influence the project's design. As such, not all project details can be determined at this time, particularly with a long-range development plan which is to be carried out under a specific plan. A general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amenable to modification to reflect environmental concerns raised during the public comment process.

Per the OPR Guide, a specific plan is typically drafted concurrently with the environmental review process and is not required to be included in the Draft EIR. This allows for comments on the Draft EIR and any potential revisions, corrections, and clarifications in the Final EIR to be reflected in the specific plan. "To the extent feasible, the process of preparing the specific plan and the environmental analysis should proceed concurrently because both documents require many of the same studies and resulting information. The information in the EIR provides decision makers with the insight

¹⁸ CEQA Guidelines § 15004(b).

necessary to guide policy development, thereby ensuring the plan's policies will address and provide the means by which to avoid potential impacts to the environment.”¹⁹

The assertion that a specific plan needs to be fully drafted prior to environmental review undermines CEQA's informational purpose coupled with the importance of public participation and feedback. The reasons not to require early circulation of the specific plan are in fact exemplified by the concerns expressed by the commenters. In accordance with CEQA, a specific plan must incorporate the environmental analysis in the EIR, rather than be developed in advance and set in stone before the EIR analysis is complete and the public has an opportunity to comment. This is consistent with CEQA and the OPR Guide. The concerns of the community as expressed in comments on the Draft EIR have been addressed through Project modifications outlined in the Final EIR.

For example, pages II-15 to II-16 of the Draft EIR list the uses that would be permitted under the proposed Specific Plan, which included “all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.” Based on input received on the Draft EIR, the Preliminary Draft Specific Plan substantially narrows the permitted uses consistent with the studio-related objective of the proposed Project, including, among other things, removal of the C2 zone text referenced above. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The Preliminary Draft Specific Plan only permits five land uses: sound stage, production support, production office, general office, and retail, as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the Draft EIR. Refer to Topical Response No. 4, Permitted On-Site Uses, for details about the permitted uses.

¹⁹ OPR Guide, p. 23.

Topical Response No. 2. Definition of Floor Area is Appropriate

Commenters discussed concerns about the definition of floor area under the proposed Specific Plan (the definition is first stated on page II-1 in Section II, Project Description, of the Draft EIR). Specifically, commenters state that the proposed floor area definition excludes more areas than the LAMC definition and underestimates the size of the Project, and, therefore, environmental impacts have been understated and were not adequately analyzed in the Draft EIR. Commenters also state that the definition is artificially narrow and inaccurate, and therefore the Draft EIR failed to account for impacts associated with certain areas below Project Grade, such as basecamp areas. Inasmuch as the commenters are concerned with potential environmental impacts resulting from elements of the Project that will be regulated by the definition of floor area, this topical response addresses those environmental issues. Contrary to the incorrect assertions made in the comments, the EIR has analyzed the full scope of the physical impacts on the environment from the Project in accordance with CEQA regardless of how floor area is defined.

As identified on page II-36 of Section II, Project Description, of the Draft EIR, the Applicant is requesting, among other Project approvals, “adoption of the TVC 2050 Specific Plan to provide regulatory controls and the systematic execution of the General Plan within the TVC 2050 Specific Plan geographic area.” Consistent with the approach taken by other specific plans in the City, the proposed Specific Plan would supersede, where applicable, the LAMC. The proposed Specific Plan’s floor area definition is based on the LAMC definition, with a few additional clarifications to account for the unique nature of studio uses and functions, as has been done in other approved specific plans for studios in Los Angeles.

The EIR’s analysis accounted for the potential physical environmental impacts of all proposed uses, areas, and activities, regardless of whether they are considered to be within the definition of floor area. CEQA requires an analysis of all physical environmental impacts, regardless of how something is defined or classified in a land use regulation (e.g., noise impacts from an above-ground parking structure must be analyzed under CEQA even though a parking structure is not considered floor area under the LAMC). Accordingly, even though basecamp areas and the Mobility Hub are not counted as floor area pursuant to the proposed Specific Plan, these areas and activities were accounted for in the EIR’s environmental analysis. For example, refer to Tables IV.M.1-5 and IV.M.1-6 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, and Tables IV.M.2-2 and IV.M.2-3 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR regarding the impacts of basecamp and the Mobility Hub on water supply and wastewater. Further, this Final EIR updates the air quality, GHG, and energy impacts to specifically account for basecamp areas and the Mobility Hub. The

updated analysis confirmed that impacts associated with basecamp and the Mobility Hub were accounted for and, therefore, no change to the Draft EIR's conclusion is warranted as there are no new significant impacts to those impact areas.

In response to comments regarding the specific exclusions under the proposed Specific Plan definition and how it compares to the LAMC definition, a discussion of the definition of floor area under the LAMC as compared to the Preliminary Draft Specific Plan, is included below for informational purposes.

LAMC Section 12.03 defines floor area as:

The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.

The Preliminary Draft Specific Plan, which, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, has been made publicly available for informational purposes in response to comments on the Draft EIR, defines floor area as:

Floor area shall be as defined in accordance with LAMC Section 12.03, with the following exceptions: areas related to the Mobility Hub; basecamp, outdoor eating areas (covered or uncovered); trellis and shade structures; covered walkways and circulation areas (including the existing marquee structure); and all temporary uses (e.g., Sets/Facades).²⁰

The proposed floor area definition is generally consistent with the LAMC definition as well as the studio definition precedent set by other approved studio specific plans.

The following clarifications to the definition of floor area in the Preliminary Draft Specific Plan are discussed below for informational purposes in response to comments:

- LAMC Section 12.03 specifically excludes “parking areas with associated driveways and ramps” from the definition of floor area. The Mobility Hub components are equivalent to “parking areas” where people can access various

²⁰ Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR for refinements made to match this definition and to remove elements of the definition of floor area expressly listed/identified within LAMC Section 12.03.

modes of transportation. Accordingly, the exclusion of the specific term Mobility Hub from the definition of floor area in the proposed Specific Plan provides definitional clarity and ensures standardized and clear regulatory compliance.

- Section II, Project Description, of the Draft EIR describes basecamps as areas at, near, or within a filming location where critical production activities can be coordinated. These areas provide for a variety of uses that are non-permanent, ancillary to and necessary for production activities in a studio and include primarily circulation, loading, craft service, parking, storage of mobile facilities and support vehicles and wardrobe, hair, and make-up equipment/services. The exclusion of these basecamp areas from the proposed floor area definition is consistent with approved studio specific plans and the LAMC Section 12.03 definition. The LAMC definition of floor area expressly excludes areas used for parking, circulation and storage. Similarly, the basecamp areas at Project Grade would not qualify as floor area under the LAMC definition because these areas are not confined within the exterior walls of a building. Further, no active production activities would occur in the basecamp areas below Project Grade. The proposed exclusion is intended to provide clarity and is consistent with the LAMC definition. The proposed basecamp areas would be located at two levels (one at Project Grade and one below Project Grade), as shown in Figures II-4(d) and II-4(e) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to provide access, circulation, parking, staging, loading, and connectivity between active production and supporting uses throughout the Project Site. Further, the Paramount Pictures Specific Plan (City of Los Angeles Ordinance No. 184,539) similarly clarified elements related to studio supportive space, such as outdoor production areas, production trailers, and sets/facades to be excluded from the definition of floor area. Similarly, the Preliminary Draft Specific Plan includes studio-specific clarifications to the LAMC definition of floor area based on the unique nature of a studio use. Thus, basecamp areas are consistent with the elements excluded from the definition of floor area in LAMC Section 12.03 and other approved studio specific plans, and are explicitly excluded from the proposed Specific Plan definition to provide definitional clarity and ensure standardized and clear regulatory compliance.
- The Project includes pedestrian bridges, covered canopies, trellises, and shade structures, which are external to the Project's buildings (i.e., "not confined within the exterior walls of a Building" per LAMC Section 12.03) and as such should not be counted as floor area. Further, excluding these areas from the definition of floor area is similar to recent City ordinances which encourage the provision of these types of elements as a way of encouraging pedestrian movement and connectivity. As such, excluding the area required for these trellis and shade structures and covered walkways is consistent with the LAMC and provides definitional clarity to ensure standardized and clear regulatory compliance.

Based on the above, the definition of floor area set forth in the Preliminary Draft Specific Plan is consistent with the EIR analyses, the LAMC definition and the precedent

established by the City for a studio specific plan. Furthermore, the EIR adequately analyzed the impacts of all elements of the Project, inclusive of all proposed uses, areas, and activities regardless of whether they are considered floor area or not.

Topical Response No. 3. Permitted On-Site Uses

Comments on the Draft EIR expressed concern about the range of uses that would be permitted by the proposed Specific Plan. In particular, commenters stated that permitting “C2” (Commercial) uses set forth by the LAMC would allow “more than 100” uses within the Project Site that are not evaluated in the Draft EIR. Commenters expressed concern that these C2 uses would also include non-studio uses, such as a sports arena, hospital, etc. Commenters also stated that the list of permitted uses within Section II, Project Description, of the Draft EIR would not promote the stated goals of the proposed Specific Plan, which focus on the need for Television City’s expansion and modernization. In addition, commenters raised questions regarding special events as a permitted use within the Project Site.

As discussed in Section II, Project Description, of the Draft EIR, the majority of the Project Site and surrounding properties, including The Grove and The Original Farmers Market to the immediate south, the Broadcast Center Apartments to the immediate west, as well as other neighborhood-serving commercial uses along Beverly Boulevard, Fairfax Avenue, and 3rd Street, are currently zoned C2. Recognizing the existing C2 zoning of most of the Project Site and immediate Project vicinity, pages II-15 and II-16 of Section II, Project Description, of the Draft EIR state that “[w]ith respect to permitted land uses, a number of production-related uses and associated accessory or ancillary uses would be allowed, as defined in the Specific Plan” and that the proposed Specific Plan would also allow “all uses set forth in the C2 Zone unless expressly prohibited in the Specific Plan.” The inclusion of C2 uses was intended to provide the opportunity to develop a small portion of publicly facing retail uses that would be complementary to existing retail/commercial uses along the shared commercial frontages and further enhance and encourage pedestrian activity along Fairfax Avenue or a portion of Beverly Boulevard.

To address the commenters’ concerns, clarifications to Section II, Project Description, of the Draft EIR have been made that include a refined list of permitted uses within the Project Site that corresponds with the proposed set of uses outlined in the Preliminary Draft Specific Plan. In particular, as set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the text in Section II, Project Description, of the Draft EIR that refers to the proposed Specific Plan allowing all uses within the C2 Zone has been deleted. As such, no uses such as sports arenas or hospitals would be permitted. In addition, permitted retail uses have been clarified to include a limited list of Neighborhood Retail uses consistent with LAMC Section 13.07 C. Other uses such as fueling stations, vehicle repair and warehouses have also been removed.

As set forth in the clarifications to the Project Description included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, all uses allowed within the Project Site would be consistent with five studio land uses: sound stage, production

support, production office, general office, and retail. The Project would continue to allow for ancillary sitewide uses such as parking, communication facilities, childcare, and facilities equipment and infrastructure supporting the studio and the five permitted land uses. Refer to the list of permitted uses in the proposed Specific Plan, which, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, has been made publicly available for informational purposes in response to comments on the Draft EIR. Collectively, the permitted uses help facilitate and support the studio and the primary studio land uses that already occur on-site (refer to pages II-5 and II-7 of the Draft EIR) with the exception of childcare facilities and retail uses, which are new uses proposed under the Specific Plan. The permitted uses would also promote the Project's studio-related objectives included on pages II-10 through II-13 of Section II, Project Description, of the Draft EIR and the stated goals of the Preliminary Draft Specific Plan. All of the permitted uses have been fully accounted for in the impact analyses within the EIR.

With regard to special events, as described in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, temporary, non-regular events that have occurred on the Project Site prior to the adoption of the proposed Specific Plan, including production-related and non-production related events, such as premieres, charitable events, community events, commercial events, and non-commercial events, and other special events defined in LAMC Section 41.20.1(a), would continue to be governed by the LAMC consistent with existing conditions. No deviation or modification to the existing Temporary Special Event permit process through the Department of Building and Safety, the Division 5 review process overseen by the City of Los Angeles Fire Department, or any other potential review by the Department of City Planning, Bureau of Street Services, or the Los Angeles Police Department is allowed under the proposed Specific Plan.

In conclusion, the list of permitted uses within the Project Site has been clarified to limit the uses to those consistent with the studio-related objectives of the Project. These uses are fully accounted for in the impact analyses in the EIR.

Topical Response No. 4. Appropriateness of Economic Objective

Commenters expressed concerns that one of the Project objectives related to the Project's projected financial return is inappropriate. These comments are referring to the following Project objective, which is included on pages II-11 to II-12 of Section II, Project Description, of the Draft EIR: "Permit a reasonable, risk-adjusted return on investment commensurate with the Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City." Comments state that the Draft EIR includes no evidence that the Project meets this objective, and that additional information, such as the Applicant's proforma, is required to adequately assess whether the Project meets this objective.

CEQA does not prohibit a public agency from adopting an economic project objective. The requirement to identify project objectives is set forth in CEQA Guidelines Section 15124(b), which provides that an EIR shall contain "[a] statement of the objectives sought by the proposed project," including "the underlying purpose of the project," but does not impose any substantive limitations on those objectives.²¹ CEQA Guidelines Section 15124(b) states that "[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary." As such, including an economic objective is appropriate under CEQA, and it accurately discloses the reality of any private development project, namely that the project must be economically viable so that its development is feasible. CEQA (Public Resources Code Section 21061.1) generally defines "feasible" as being "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Furthermore, including an economic objective, thereby demonstrating that economic viability is an underlying purpose of the Project, assists the decision-maker and the public in evaluating the relative capability of the Project, and its alternatives, to "feasibly" meet the rest of the Project objectives. Specific to the Project's alternatives, CEQA Guidelines Section 15126.6(f) provides that an "EIR need examine in detail only the [alternatives] that the Lead Agency determines could feasibly attain most of the basic objectives of the project" and lists the factors that the lead agency should consider in determining the "feasibility" of an alternative, which include but are not limited to "economic viability."

²¹ Further, CEQA explicitly states that courts "shall not interpret [CEQA] in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines" (Public Resources Code § 21083.1).

Under CEQA, project objectives play an important role in creating an EIR that gives the public and government agencies the information needed to make informed decisions, thus protecting not only the environment but also informed self-government. Twelve Project objectives are included in Section 4 (commencing on page II-10) of Section II, Project Description, of the Draft EIR. In addition to those Project objectives, Section 4 states that the underlying purpose of the Project “is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot.” In accordance with CEQA Guidelines Section 15126.6, all Project objectives are broad enough to allow for a reasonable consideration of alternatives that reduce environmental impacts. The City, as the lead agency in this case, satisfied that obligation by preparing a Draft EIR that analyzed a feasible range of alternatives as required by CEQA and, based on that analysis, properly determined if the alternatives would meet the Project objectives to the same extent as the Project. See Topical Response No. 16, Project Alternatives Analysis, for a detailed discussion of the alternatives analyzed in the Draft EIR.

Further, the Project objective concerning a reasonable rate of return that will allow for the Project’s “economic viability” so that development of the Project is feasible.

As detailed by the Applicant in the Economic Considerations Memorandum included as Appendix FEIR-4, the Project has been designed to feasibly achieve all of the Project objectives, including but not limited to the objective to develop and economically viable project.

Finally, commenters requested financial information from the Applicant in light of the Project objective. However, CEQA does not require the EIR itself to provide any evidence of the feasibility of those alternatives, nor an economic or cost analysis of the various project alternatives and mitigating measures identified by the EIR. Instead, it requires the lead agency to make findings and determinations as to the feasibility of such alternatives or mitigation measures with respect to each significant environmental impact which the EIR identifies, based on substantial evidence set forth anywhere in the record. Further, the Project’s decision-makers would review the feasibility of each Project alternative studied in the EIR to meet all or a portion of the Project objectives, based on the evidence in the whole of the record. As such, the Project objectives and alternatives analysis in the Draft EIR comply with CEQA and the CEQA Guidelines.

Topical Response No. 5. Historical Resources

A. Existing Evaluation and Designation of the Primary Studio Complex

Several comments question the existing historic evaluation of CBS Television City (Television City) and assert that the Project Site must be completely re-evaluated for compliance with CEQA. These comments suggest that the period of significance that was determined for Television City (1952–1963) was “artificially limited,” and the identified physical features that contribute to the property’s historic significance were therefore undercounted. Specifically, comments suggest that the existing historic evaluation of the Project Site failed to identify the 1969 Mill Addition and the 1976 Support Building as worthy of historic designation.

The assertion that the Project Site must be re-evaluated is not supported by substantial evidence and is contrary to CEQA guidance and practice. Under CEQA, a property designated under a local preservation ordinance is presumed to be a historical resource.²² In addition, requirements for CEQA historical resource assessment reports established by the Los Angeles Office of Historic Resources (OHR) clearly state that if a property is already designated, an assessment of eligibility is not required. Instead, the report should summarize the property’s significance pursuant to the designation documentation.²³ As such, the Draft EIR and supporting Historical Resources Technical Report (Historic Report) prepared by Historic Resources Group (HRG), which is included in Appendix C of the Draft EIR, were prepared in accordance with these requirements. As discussed below, the Historic-Cultural Monument (HCM) designation for Television City is limited to the original 1952 Primary Studio Complex. Furthermore, the designation documentation for Television City was reviewed by HRG for the accuracy of the information, consistency with National Park Service (NPS) guidance, and for physical changes that may have occurred to the property since the designation. HRG determined that the designation documentation was in conformance with best practices in historic preservation and that the property had not been altered since the designation. Thus, HRG concurred that the designation made the appropriate findings.

As discussed in the Draft EIR and Historic Report, the Primary Studio Complex, consisting of the 1952 Service Building and Studio Building, is a historical resource because it was formally designated as HCM No. 1167 by the City Council on June 26, 2018

²² Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5(a)(2).

²³ Department of City Planning, Office of Historic Resources, Requirements for Historical Resource Assessment Reports, updated July 2017.

(CHC-2018-476-HCM). That designation was supported by a comprehensive historic resources assessment dated April 11, 2018 and prepared by Architectural Resources Group (ARG) (2018 Historic Resource Assessment).²⁴ Notably, the 2018 Historic Resource Assessment concluded that the period of significance was 1952 to 1963 and that “extensive research did not indicate that any of Television City’s post-1963 additions contribute to its historic significance. These include the 1969 eastern expansion of the Service Building, the 1976 addition of the Support Building west of the Studio Building; the 1992 East Studio Building which stands wholly independent of the Primary Studio Complex; the addition of all of the site’s ancillary buildings and structures; and the site’s overall hardscape/landscape as it exists today.”²⁵

The 2018 Historic Resource Assessment provided the baseline analysis for the HCM nomination and was part of the administrative record that was before the Cultural Heritage Commission and the City Council when they considered the nomination.²⁶ The proposed nomination and supporting documents in the record was subject to several public hearings. These included regular meetings of the Cultural Heritage Commission on March 1 and May 3 of 2018, the Planning and Land Use Management Committee on June 19, 2018, and the City Council on June 26, 2018. Thus, these findings were reviewed and discussed in public hearings of the Cultural Heritage Commission, the Planning and Land Use Management Committee, and the City Council where no objections were raised by historic preservation professionals, advocates, interested parties, or the public.²⁷ Consistent with the 2018 Historic Resource Assessment, the Cultural Heritage Commission did not recommend the designation of the 1969 Mill Addition or the 1976 Support Building. Instead, the Commission recommended the adoption of a resolution that limited the HCM to: (1) the original 1952 Service Building; (2) the original 1952 Studio Building; (3) the enclosure of the Service Building’s north façade in 1959; and (4) the addition of a small compressor room to that building’s east façade, which are collectively referred to as the Primary Studio Complex. The City Council adopted the HCM findings (HCM Findings) based upon the recommendation of the Cultural Heritage Commission.²⁸

²⁴ A copy of the 2018 Historic Resource Assessment is attached to the Historic Report, which is provided at Appendix C.1 of the Draft EIR.

²⁵ 2018 Historic Resource Assessment, p. 60.

²⁶ The findings of the 2018 Historic Resource Assessment, including the conclusion as to the period of significance, were specifically brought to the attention of the Cultural Heritage Commission in a letter dated April 17, 2018, by Gibson, Dunn & Crutcher. The letter is included in the agenda packet for the HCM designation, which is included in Appendix C of the Historic Report.

²⁷ See Council File No. 18-0491.

²⁸ The adopted HCM designation, including the HCM Findings, is included in Appendix C of the Historic Report.

Accordingly, the historic significance of the property, its period of significance, and the physical elements that convey its historic significance were determined, reviewed, approved, and formally adopted by the Los Angeles City Council. Further, in preparing the Historic Report, HRG thoroughly reviewed the 2018 Historic Resource Assessment for consistency with industry standards. Additionally, HRG conducted Project Site visits in April and May of 2021 and research to account for physical changes that may have occurred and new information that may have come to light since 2018. As stated on page 12 of the Historic Report, based on a comprehensive review of all relevant materials, HRG concurred with the 2018 Historic Resource Assessment evaluation. The evaluation of significance and integrity from the 2018 Historic Resource Assessment, which is included in Appendix D of the Historic Report, is summarized on pages IV.B-24 to IV.B-27 of the Draft EIR. The adopted HCM Findings are included in Appendix C of the Historic Report. By reviewing, confirming, and incorporating the existing evaluation and approved findings of historic significance for the Project Site, the Draft EIR is in conformance with standard CEQA practice and City of Los Angeles requirements for the analysis of impacts to historical resources under CEQA.

Public comments assert that the existing evaluation did not properly assess the Project Site for historic significance, but this is not substantiated by the facts and no substantial evidence is provided to support this assertion. The 2018 Historic Resource Assessment identified Television City's original Primary Studio Complex, consisting of the 1952 Service Building and Studio Building, to be individually eligible for listing in the National Register, California Register, and as an HCM. The period of significance for Television City was defined as 1952–1963, beginning with the year the original Primary Studio Complex was constructed and ending with the year that CBS ended its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City. As stated above, the 2018 Historic Resource Assessment provided the baseline information for the HCM nomination and was appended to the nomination packet for consideration by the Cultural Heritage Commission and City Council. Concurring with the 2018 Historic Resource Assessment, the resulting nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the 1976 Support Building and any other buildings and structures constructed after 1963 were not included in the nomination. Furthermore, HRG concurred the designation made the appropriate findings based on a comprehensive review of all relevant materials as well as additional field surveys and archival research.

Commenters contend that the 1952–1963 period of significance for the Television City property is too narrow and that the appropriate period is the “span of time when the property actively contributed to the growth and popularity of commercial television, which ended no earlier than 1979.” Justification for extending the period of significance through “at least” 1979 appears to rest on the recognition that CBS continued to produce television programs on the Project Site after 1963. The assertion that the period of significance

needs to be expanded to accommodate years of additional television production incorrectly conflates continued use with historic significance. Likewise, the assertion inaccurately presumes, without evidence, that the property has ceased to actively contribute “to the growth and popularity of commercial television.”

NPS guidance for determining a period of significance states that “[c]ontinued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property *made the contributions or achieved the character on which significance is based*” (emphasis added).²⁹ As identified in the 2018 Historic Resource Assessment, the Primary Studio Complex is not historically significant simply for its “contribution to the growth and popularity of commercial television” as some commenters have suggested. That description could be applied to any number of studio properties throughout Los Angeles where television programming was and continues to be produced. The historic significance of Television City rests in its specific associations with the maturation of commercial television in the post-World War II period during which television use expanded exponentially, and the concurrent evolution of CBS into one of the nation’s three largest and most powerful television networks. CBS’ construction of Television City—“the first large-scale, all new facility in the nation designed to meet the mass production of television programming”³⁰—marked CBS’ ascendance. The program and function of Television City—a seminal design by the lauded architectural firm of William Pereira and Charles Luckman—represented state-of-the-art thinking regarding television production as it was understood in the early 1950s. Significant to its design was the “intentional divergence from the familiar film studio property type” traditionally conceived as a disparate collection of individual building types and sets arranged on a large walled lot. Instead, Television City was conceived as a single, integrated, and self-contained building complex.³¹

As explained in the 2018 Historic Resource Assessment, the utility of specialized, purpose-built television production facilities had come into question by the late 1950s, as pre-filmed television production overcame the live and taped methods that purpose-built facilities like Television City were optimized for. By 1963, CBS had ended its original concept for Television City and became the primary tenant of the former Republic Pictures

²⁹ Linda McClelland, Carol D. Shull, James Charleton, et al. National Register Bulletin #16: Part A: How to Complete the National Register Registration Form (Washington D.C.: U.S. Department of Interior, 1997), p. 42.

³⁰ Historic-Cultural Monument Nomination Form for CBS Television City, Section 7B Statement of Significance, December 11, 2017. The nomination form is included in the agenda packet for the HCM designation, which is included in Appendix C of the Historic Report.

³¹ Architectural Resources Group, CBS Television City, Los Angeles, Historic Resource Assessment, April 11, 2018, p. 31.

film studio lot in Studio City, changing its name to CBS Studio Center and moving its filmed production there. Thus, the 1963 end date for the period of significance was not arbitrary. Rather, it was based upon the history of Television City, the historic context in which it was evaluated, and the appropriate application of NPS guidance.

Comments also assert that the 2018 Historic Resource Assessment and HCM Findings did not acknowledge the contributions of master architect Gin Wong, who joined the firm in 1950 and served as project coordinator, in the early stages of his career, for the initial design of the Primary Studio Complex by Pereira & Luckman. Under the auspices of his own firm, Gin Wong Associates, founded in 1973, he would subsequently be responsible for the 1976 Support Building addition and 1993 East Studio Building at Television City. Refer to pages IV.B-22 to IV.B-23 of the Draft EIR and pages 30 to 31 of the Historic Report for a discussion of the Support Building and East Studio Building. Wong's contributions to the design and construction of Television City are appropriately acknowledged in the 2018 Historic Assessment and recognized in the HCM nomination. NPS guidance, however, states that not every property designed by a master architect is necessarily significant. To be eligible, the property "must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her work."³² The improvements at Television City directly credited to Wong are simple additions constructed after 1963, outside the period of significance. They do not represent an architectural achievement and did not play an important role in Wong's career. Therefore, the 1976 Support Building addition and 1993 East Studio Building are not eligible as historical resources in and of themselves or character-defining features of Television City because they were designed by Wong.

For the reasons discussed above, the period of significance was correctly defined as 1952–1963, beginning with the year the original Primary Studio Complex was constructed and ending with the year CBS ended its vision of a single unified production facility and moved its filmed programming operations to Studio City. This span of time includes the maturation of commercial television as the primary media form for entertainment and information in the United States, the ascendance of CBS as a leading television network, and the "Golden Age" of live and taped television programming for which Television City was specifically designed. By 1963, television was well-established as the preeminent American entertainment and information medium. And because so much of television programming had switched to a pre-filmed format by 1963, the original master plan and design for Television City no longer guided its development. Television production, including filmed production, continued at Television City in the decades after 1963, but Television City itself became just one of many locations that hosted television production

³² Patrick Andrus and Rebecca Shrimpton, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), p. 20.

throughout the Los Angeles area. Based upon NPS guidance for selecting the period of significance, the period of significance of 1952 to 1963 is justified because that is the period the resource achieved the character on which significance is based, which is reflected in the HCM Findings.³³

B. Historic Structure Report and the Future Preservation of the Primary Studio Complex

Public comments assert that the completion of a Historic Structure Report (HSR), included as Project Design Feature CUL-PDF-2, is required to support the impact analysis regarding the Primary Studio Complex. These assertions are incorrect and are not consistent with City of Los Angeles regulations for the treatment of designated HCMs as well as the standard purpose and use of an HSR.

Before reviewing those regulations, it is important to note that the Draft EIR contained an in-depth evaluation of whether the proposed physical changes to the Primary Studio Complex would constitute a significant impact to the Primary Studio Complex, a designated HCM and a historical resource under CEQA. Accordingly, the preparation of an HSR in the future does not defer the analysis of potential impacts to the historical resource. Instead, the HSR provides an additional process that will complement the City's regulations aimed at protecting and managing the historical resource.

As discussed in Section IV.B, Cultural Resources, of the Draft EIR, the City has adopted several ordinances, codified in the LAMC and Los Angeles Administrative Code (LAAC), to preserve and protect designated historical resources like the Primary Studio Complex. The Cultural Heritage Ordinance (Ordinance No. 185,472; LAAC Section 22.171) pertains to historical resources designated as HCMs. As stated on page IV.B-53 of the Draft EIR, the Project would comply with Section 22.171.14 of the Cultural Heritage Ordinance. The determination for the approval of a permit for substantial alteration to a designated HCM is based upon compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). Thus, mitigation is not required because compliance with the Rehabilitation Standards would be ensured by OHR, which would review permit applications and construction documents prior to the issuance of building

³³ The claim that the period of significance should extend to "at least" 1979 is also contrary to NPS guidance for another reason. That guidance states that "[f]ifty years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period." Notably, if in 2018 the Cultural Heritage Commission (or the review of the 2018 Historic Resource Assessment conducted for the Draft EIR Historic Report) had determined that the period of significance concluded at 50 years before Television City's HCM designation, the end date for the period of significance would have been 1968, meaning the 1969 Mill Addition and the 1976 Support Building would still have been excluded.

permits, pursuant to the Cultural Heritage Ordinance. As stated on page IV.B-53 of the Draft EIR, although not required by the Cultural Heritage Ordinance, the Applicant would retain a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for historic architecture or architectural history with at least five years of demonstrated experience in applying the Rehabilitation Standards to such projects. The professional would create a technical memorandum at each phase of the architectural design process (including schematic design, design and development, and construction documents). In the event the plans do not comply with the Rehabilitation Standards, the memorandum would make recommendations for changes to bring the plans into compliance. The professional would then submit the memorandum to OHR for review and concurrence. Pursuant to the Cultural Heritage Ordinance, building permits may only be issued after OHR has confirmed that the plans comply with the Rehabilitation Standards. Therefore, the Draft EIR correctly concluded that impacts to the Primary Studio Complex would be less than significant as a result of regulatory compliance.³⁴

In addition, per Project Design Feature CUL-PDF-2, an HSR would be prepared to further document the Primary Studio Complex and guide its rehabilitation in compliance with the Rehabilitation Standards. An HSR provides documentary, graphic, and physical information about a historical resource and existing conditions. Broadly recognized as an effective part of preservation planning, an HSR may also address the management and maintenance of the historical resource. The purpose of an HSR is not the analysis of project impacts. Instead, an HSR is prepared to inform and guide development of the specific architectural and engineering plans necessary for permitting. An HSR is not required by the Cultural Heritage Ordinance but is included as Project Design Feature CUL-PDF-2 to facilitate OHR's review of construction documents. As stated on page IV.B-40 of the Draft EIR, the HSR would be completed prior to the development of the architectural and engineering plans for Project work that has any relation to the Primary Studio Complex. The HSR would set forth the most appropriate approach to treatment and outline a scope of recommended work before the commencement of any such construction. As such, the HSR would serve as an important guide for the rehabilitation of the Primary Studio Complex and would provide detailed information and instruction above and beyond what is typically available prior to the rehabilitation of a historical resource.

The claim that an HSR is required to properly analyze potential impacts to the Primary Studio Complex is incorrect as neither the State of California nor the City of Los Angeles requires an HSR as baseline information for the CEQA review of historical resources. Moreover, the Applicant has voluntarily incorporated an HSR as a Project Design Feature (PDF), which would be prepared to inform the rehabilitation of the Primary Studio Complex. In addition, pursuant to Section 22.171.14 of the Cultural Heritage

³⁴ See CEQA Guidelines Section 15064.5(b)(3).

Ordinance, the Project plans would be thoroughly reviewed by OHR for compliance with the Rehabilitation Standards prior to the issuance of any building permits. Further, although not mitigation measures, all PDFs, including the HSR, would be included in the Mitigation Monitoring Program for the Project to ensure their implementation.

C. Potential New Construction North of the Primary Studio Complex

Public comments question potential new construction in the Viewshed Restoration Area located north of the Primary Studio Complex that was established by the HCM Findings. The Viewshed Restoration Area is defined in the HCM Findings as extending approximately 430 linear feet along Beverly Boulevard from 7811 Beverly Boulevard on the west to Genesee Avenue on the east and extending southward toward the Primary Studio Complex. Commenters raise objections to Height Zone A (see Figure II-5 in Section II, Project Description, of the Draft EIR), which corresponds to the Viewshed Restoration Area, as defined in the HCM Findings, and would allow for buildings up to 58 feet in height, and assert that buildings at this height would block views of the Primary Studio Complex from Beverly Boulevard resulting in significant impacts to the Primary Studio Complex. The Project's restoration of the viewshed along Beverly Boulevard, described below, would be ensured by the historic regulations and procedures discussed in the Draft EIR and set forth in the Preliminary Draft Specific Plan, and the 58-foot height limit is only one of the regulations that future development in the Viewshed Restoration Area would be required to comply with. Additionally, any new construction would be limited by the HCM designation, the HCM Findings, and the Cultural Heritage Ordinance. The HCM Findings make clear that construction within the Viewshed Restoration Area is limited and subject to review by the City. Any proposal in the Viewshed Restoration Area would also be subject to review by the City for compliance with the Viewshed Restoration Area objectives outlined in the HCM Findings and would be codified in the proposed Specific Plan.

As discussed in the Draft EIR, the proposed Specific Plan would further codify the HCM designation and HCM Findings by establishing Height Zone A and the Viewshed Restoration Area objective standards. The 58-foot height limit on new construction within Height Zone A, which is approximately two-thirds of the 88-foot height of the existing Primary Studio Complex, is taken directly from the HCM Findings. The HCM Findings state that "it is assumed that [buildings within the Viewshed Restoration Area] would not exceed two-thirds the height of the existing Primary Studio Complex, and that one-story buildings would be acceptable throughout the Viewshed Restoration Area[,] but this "does not absolutely prohibit structures that are higher than the two-thirds limit, so long as such structures do not interfere with the mandated view corridors." In addition, the 58-foot height limit in Height Zone A is also subject to the HCM Findings for future development within the Viewshed Restoration Area. As discussed on pages V-4 to V-5 and V-13 in Section V, Alternatives, of the Draft EIR, any development in the Viewshed Restoration Area would be

limited by the HCM designation, and alternatives that would introduce substantial development within the Viewshed Restoration Area were eliminated from consideration since they would be inconsistent with the HCM designation.³⁵ This is consistent with the Project's objective to "[r]ehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation[.]" stated on page II-10 in Section II, Project Description, of the Draft EIR. As stated on page IV.H-43 in Section IV.H, Land Use and Planning, of the Draft EIR, "[u]ltimately, compliance with the Specific Plan's historic preservation regulations would allow for the rehabilitation and preservation of the integrity of the Primary Studio Complex, consistent with the HCM designation."

Commenters misconstrue the maximum height limit with permitted height. However, even if a proposed building in the Viewshed Restoration Area is less than 58 feet, it may nevertheless not be permitted if it fails to comply with the HCM Findings relating to the viewshed, as discussed below. For example, a proposal that includes a 58-foot building across the entire Height Zone A area, as shown in the massing examples included in public comments, would be inconsistent with the HCM Findings and the Viewshed Restoration Area objective standards of the proposed Specific Plan.

In addition to the 58-foot height limit, any development in the Viewshed Restoration Area would be required by the HCM Findings to restore the currently obstructed character-defining viewshed features of the Primary Studio Complex as seen from adjacent public areas along Beverly Boulevard. As discussed in Section IV.B, Cultural Resources, of the Draft EIR, the Project would open up the currently obstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised. Views from the public right-of-way along Beverly Boulevard are currently obstructed by security fencing planted with dense shrubs and climbing vines, as well as existing solar canopies and miscellaneous structures. The distinctive entry bridge generally cannot be seen from Beverly Boulevard, and only the very top portion of the Primary Studio Complex is visible. The Project would include more visually transparent fencing along the northern perimeter and enforce height restrictions between Beverly Boulevard and the Primary Studio Complex so that the currently obstructed views of the Primary Studio Complex, including the main entry bridge, would be restored.

The HCM Findings set forth the character-defining viewshed features of the Primary Studio Complex as seen from adjacent public areas along Beverly Boulevard. The character-defining features from the HCM Findings are listed on pages IV.B-25 through

³⁵ See Topical Response No. 16, Project Alternatives Analysis, for a discussion of the Draft EIR's Project alternatives analysis.

IV.B-27 of the Draft EIR. The HCM Findings state that “if alterations are proposed to the Primary Studio Complex in the future, restoration of the historic viewshed from Beverly Boulevard in a manner that incorporates appropriate security measures for the property’s use is strongly encouraged.” Per Project Design Feature CUL-PDF-1, which is included on pages IV.B-39 through IV.B-40 in Section IV.B, Cultural Resources, of the Draft EIR, the Project would “[p]reserve the existing character-defining features of the Primary Studio Complex, as detailed in the designated Historic-Cultural Monument (HCM) No. 1167 (CHC-2018-476-HCM), and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project).” Accordingly, any future development in the Viewshed Restoration Area would be required to restore and maintain meaningful views of the Primary Studio Complex and the character-defining viewshed features set forth in the HCM Findings.

Further, the proposed Specific Plan would codify the viewshed restoration measures discussed in the HCM Findings and Draft EIR. Specifically, any Project within the Viewshed Restoration Area shall preserve meaningful views of the Primary Studio Complex from the adjacent public right-of-way along Beverly Boulevard.

Accordingly, in addition to complying with the 58-foot maximum height limit and restoring the character-defining viewshed features, development in the Viewshed Restoration Area greater than one story in height would require discretionary approval, as outlined in the Preliminary Draft Specific Plan, in addition to CEQA compliance review.

The Draft EIR analyzed the proposed development program (Conceptual Site Plan) described in Section II, Project Description, of the Draft EIR (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). Under the proposed Specific Plan, future proposals in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require a discretionary approval, including review by OHR and the Department of City Planning, and CEQA compliance review. As shown in Figure II-4, Conceptual Site Plan, of the Draft EIR, new construction north of the Primary Studio Complex would be limited to single story bungalows, and largely unobstructed views of the Primary Studio Complex looking southeast from Beverly Boulevard would be maintained. The HCM Findings expressly state that “one-story buildings would be acceptable throughout the Future Viewshed Restoration Area.” As analyzed in the Draft EIR, the Conceptual Site Plan would not result in significant impacts to the Primary Studio Complex as defined by CEQA. Although Height Zone A would establish a maximum height limit of 58 feet, the Draft EIR only analyzed one-story buildings in the Viewshed Restoration Area as shown in the Conceptual Site Plan, and, therefore, any future proposal that includes a building greater than one story in height in the Viewshed Restoration Area would require a discretionary approval through the

Project Compliance process pursuant to LAMC Section 11.5.7[13B.4.2] and additional CEQA review.

Notwithstanding the 58-foot height limit in Height Zone A, any new construction would be limited by the HCM designation, the HCM Findings, and the Cultural Heritage Ordinance. Consistent with the HCM Findings, the Draft EIR states that all new construction located within the Viewshed Restoration Area would require review by the Director of City Planning. As discussed in Section B above, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance. Restoration of the character-defining views to the Primary Studio Complex would be ensured by the procedures and requirements under the proposed Specific Plan and Cultural Heritage Ordinance, which are consistent with the procedures and requirements described in the Draft EIR. As such, any proposal for new construction within the Viewshed Restoration Area would be required to meet the objectives of the HCM Findings, conform with the Rehabilitation Standards, and would not result in significant impacts to the Primary Studio Complex as defined by CEQA. Thus, the Draft EIR correctly concluded that, based on the Conceptual Site Plan, the impact from potential new construction within the Viewshed Restoration Area (Height Zone A) would be less than significant.

D. Analysis of Impacts to the Primary Studio Complex

Commenters question the analysis of impacts to the Primary Studio Complex and claim, contrary to the findings in the Draft EIR, that the Project would diminish the integrity of the Primary Studio Complex such that its eligibility for listing as a historical resource would be threatened.

Commenters cite the fact that the 1969 Mill Addition and 1976 Support Building would be removed, reiterating assertions that these structures are “likely” historically significant. As discussed above and in Section IV.B, Cultural Resources, of the Draft EIR, Television City’s original Primary Studio Complex was formally designated as HCM No. 1167, and that designation did not include the 1969 Mill Addition or the 1976 Support Building. As such, the physical elements that contribute to the historic significance of the Primary Studio Complex have been determined by the City of Los Angeles. There is no requirement to re-evaluate the findings of the HCM designation under CEQA. Furthermore, as discussed on pages 12 and 13 of the Historic Report, HRG concurred the designation made the appropriate findings based on a comprehensive review of all relevant materials as well as additional field surveys and archival research. (For more information on existing evaluations and the designation of the Primary Studio Complex as an HCM, see Section A above.)

As analyzed in the Draft EIR, removal of the 1969 Mill Addition and 1976 Support Building would not diminish the integrity of the Primary Studio Complex. Because the 1969 Mill Addition and 1976 Support Building are both non-historic, post-1963 additions, their removal would restore the Primary Studio Complex closer to its original construction. Removal of the 1976 Support Building would also reveal the remaining portions of the west wall of the original Studio Building, which would improve, not diminish, the integrity of the Primary Studio Complex. Moreover, all of the character-defining features of the HCM as set forth in the 2018 Historic Resource Assessment, the HCM Findings, and the Draft EIR would be retained and restored as part of the Project.

In addition, several comments assert that potential impacts from the proposed rooftop addition to the Primary Studio Complex were not adequately analyzed and could, in fact, result in significant impacts to the Primary Studio Complex. To bolster this claim, several comment letters contain massing studies showing a hypothetical rooftop addition of multiple stories constructed on top of the Primary Studio Complex. The hypothetical massing studies ignore the Project Parameters that are established in Project Design Feature CUL-PDF-1 which limit the height and placement of any rooftop addition to ensure that the integrity of the Primary Studio Complex is retained.

Potential impacts from any rooftop addition were thoroughly analyzed in Section IV.B, Cultural Resources, of the Draft EIR (page IV.B-50) and Historic Report (pages 65–68). As stated above, any rooftop addition to the Primary Studio Complex would comply with the Project Parameters set forth in Project Design Feature CUL-PDF-1 on pages IV.B-38 to IV.B-40 of the Draft EIR. Per Project Design Feature CUL-PDF-1, any rooftop addition would consist of a single rectangular volume (a separate and distinct volume rather than an extension of the Primary Studio Complex), be limited to 36 feet in height above the top of the parapet of the Studio Building, and be set back a minimum of 55 feet from the north façade of the Studio Building. This would set back any rooftop addition approximately 167 feet from the north façade of the Service Building. Additionally, any rooftop addition would be structurally engineered such that it could be removed without impairing the essential form and integrity of the Primary Studio Complex, consistent with Rehabilitation Standard 10. As discussed on page IV.B-50 of the Draft EIR and in the Historic Report, any rooftop addition would be subordinate in size and scale to the Primary Studio Complex, consistent with NPS's Preservation Brief 14, New Exterior Additions to Historic Buildings: Preservation Concerns, with the addition approximately 25 percent of the size of the Primary Studio Complex in overall volume and less than half its height. It would also be set back from the primary (north) façade of the Primary Studio Complex to further reduce its visual presence when viewed from the north. The rectangular form of any rooftop addition would also be compatible with the International Style architecture of the Primary Studio Complex so that the overall form, massing, and configuration of the Primary Studio Complex would not be adversely affected. For these reasons, any rooftop addition would not materially impair the physical characteristics that convey the historical

significance of the Primary Studio Complex, nor its integrity. Thus, impacts from the construction of any rooftop addition would be less than significant as defined by CEQA.

More broadly, comments assert that the Draft EIR and Historic Report “downplay or ignore” the Project’s overall impacts to the integrity of the Primary Studio Complex, and that, contrary to the findings in the Draft EIR, new construction would “result in a significant loss of integrity with respect to setting, feeling, and association” resulting in significant impacts to the Primary Studio Complex.³⁶

The Draft EIR and Historic Report included a full analysis of integrity after implementation of the Project (refer to Draft EIR pages IV.B-54 to IV.B-55 and Historic Report pages 76 to 81). To be conservative, the analysis in the Draft EIR assumed full buildout (i.e., 1,874,000 square feet of floor area). This analysis concluded that integrity of association would be retained but the integrity of feeling for the Primary Studio Complex would be adversely affected. In addition, the integrity of setting has already been lost prior to this Project. As explained on page 80 of the Historic Report, NPS guidance states, “to retain historic integrity a property would always possess several, and usually most of the (seven) aspects” of integrity.³⁷ The integrity analysis included in the Draft EIR and Historic Report found that after the Project is constructed, the Primary Studio Complex would retain most of the aspects of integrity, including location, design, materials, workmanship, and association. Retaining five out of seven of the aspects of integrity—one of which was already compromised prior to the Project—would qualify as retaining “most.”

As discussed on pages IV.B-54 to IV.B-55 of the Draft EIR and pages 76 to 81 of the Historic Report, the integrity of setting for the Primary Studio Complex has already been lost over time due to later additions and related new construction as well as the replacement of the original front lawn with surface parking and miscellaneous structures. The integrity of feeling would be compromised by the Project. However, the Primary Studio Complex would still be able to convey its overall historic character, appearance, and association with its historical period when it became the first large-scale, purpose-built television facility. Moreover, to support the preservation of the Primary Studio Complex and maintain its overall integrity, the Project would include an HSR as a PDF to guide the rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation

³⁶ Setting is the physical environment of an historic property, constituting topographic features, vegetation, manmade features, and relationships between buildings or open space; Feeling is a property’s expression of the aesthetic or historical sense of a particular period of time; and Association is the direct link between an important historic event or person and a historic property as defined in National Register Bulletin #15, pp. 44–45. The definitions of the seven aspects of integrity are included on pages 22–23 of the Historic Report.

³⁷ Ibid., p. 44.

Standards. Mitigation is not required because compliance with the Rehabilitation Standards would be ensured by OHR, who would review the construction documents prior to approving the building permits pursuant to the Section 22.171.14 of the Cultural Heritage Ordinance.

E. Impacts to Historical Resources in the Vicinity of the Project Site

Comments were received on the Draft EIR regarding the Project's potential impacts to historical resources located outside of the Project Site. As discussed on page IV.B-27 of the Draft EIR, in addition to analyzing the Project Site itself, the Historic Report defined an area surrounding the Project Site where potential direct or indirect impacts could reasonably be expected to occur (i.e., the Project Site vicinity). In determining the Project Site vicinity, the Historic Report considered three factors: (1) the existing setting of the Project Site; (2) the scale and nature of the proposed Project; and (3) the impacts the Project could have on historical resources, if such resources exist. The Historic Report defined the Project Site vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Properties beyond the Project Site vicinity were not analyzed because the Project would have no potential to directly or indirectly impact those properties or their immediate surroundings based upon the thresholds in Appendix G of the CEQA Guidelines.

In addition to designated HCMs, properties identified as appearing eligible for national, state, or local landmark or historic district designation through SurveyLA were treated as historical resources in the Historic Report. To provide a conservative analysis, the Historic Report did not refute any recent survey findings regarding the eligibility of these properties, and the properties were not researched or re-evaluated on an intensive level to independently determine or disprove their eligibility as potential historical resources. Five historical resources were identified in the Project Site vicinity, including the Rancho La Brea Adobe,³⁸ The Original Farmers Market,³⁹ Fairfax Theater, Chase Bank, and Air Raid Siren No. 25. The analysis of the potential impacts to these resources is included on pages IV.B-27 to IV.B-31 of the Draft EIR.

What constitutes a significant impact to a historical resource is defined in Appendix G of the CEQA Guidelines. As explained in the Draft EIR and Historic Report, the analysis of impacts under CEQA is focused on whether there would be a "substantial adverse

³⁸ The Rancho La Brea Adobe is also known as the Gilmore Adobe.

³⁹ The Rancho La Brea Adobe and The Original Farmers Market are separate properties that were designated together as HCM No. 543.

change” to a historical resource as a result of a project. Pursuant to CEQA Guidelines Section 15064.5(b), “substantial adverse change” is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” This section further states that “[t]he significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register of Historical Resources...or a local register of historical resources.” As explained and analyzed in the Draft EIR and Historic Report, all demolition, alteration, and new construction associated with the Project would be contained within the Project Site. As demonstrated in the Draft EIR, the Project would not physically alter any of the identified historical resources in the vicinity of the Project Site.

No evidence of material alteration of any of the historical resources in the vicinity of the Project Site was identified by the commenters. Instead, their criticism of the analysis focuses on visual and scenic impacts, including the need for a viewshed study. Under CEQA, impacts to aesthetics are based on different criteria and thresholds than those used for historical resources. As set forth in Appendix G of the CEQA Guidelines and in the Initial Study for the Project included as Appendix A of the Draft EIR, aesthetic impacts under CEQA include the consideration of: scenic vistas; scenic resources (including historical resources) within a scenic highway; for urban projects, consistency of the project with applicable regulations regarding scenic quality; and light and glare. Thus, the analysis of aesthetics considers the experiences of people who may view a scenic resource, while the analysis of historic impacts considers whether a project would adversely affect the integrity of an historical resource. As discussed in the Initial Study included as Appendix A to the Draft EIR, in accordance with Senate Bill (SB) 743 and PRC Section 21099(d)(1), the Project is an “employment center project” located within a transit priority area. As such, the Project’s aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA.

Because the Project Site is located outside the parcel boundaries of the identified historical resources in the vicinity, the Project would not impact their integrity of immediate setting. The analysis of indirect impacts on historical resources in the Draft EIR considered the following:

- Why is the historical resource significant?
- What are the physical characteristics of the historical resource that conveys its significance?
- Specifically, is the broad setting a character-defining feature of the historical resource?

- If so, is the broad setting intact from the historical resource's period of significance or is the broad setting already disrupted?
- How and to what degree is the broad setting diminished by the visibility of the Project from the historical resource?

The public comments do not express why the broad setting of the nearby historical resources is essential to conveying their significance, do not recognize that the broad setting has already been altered by subsequent development, and do not explain how changes to the urban landscape would diminish their integrity. For example, Comment No. 26-E.2-8 and Comment No. 35-75 claim that “any interruption of the existing horizon line would have an obstructive effect on the historic properties by altering the character, setting, feeling and viewshed that make them eligible for listing in NRHP and the CRHR,” but no attempt is made to explain how the character, setting, feeling, and viewshed would be altered, or how these attributes contribute to the resources in the vicinity of the Project Site being eligible for historic listing.⁴⁰ Indeed, the broad settings of all the nearby historical resources have been subject to continual change and alteration over time as is typical of urban environments. As such, the physical aspects of these resources that are critical to conveying their historic significance are largely contained to their respective properties. No alteration to a hypothetical viewshed or the broad setting of these resources would diminish their integrity such that their eligibility for historic listing is threatened.

Ultimately, the commenters imply that the visibility of new construction alone would somehow adversely affect the integrity of nearby resources and threaten their eligibility for historic listing. However, none of the comments demonstrate how the visibility of new construction would result in a substantial adverse change to any historical resources in the Project Site vicinity. Mere visibility of a new building, structure, or feature from various vantage points alone would not result in a significant impact to any of the historical resources located in the vicinity of the Project Site. For a significant impact to occur, the integrity of the historical resource would have to be diminished to the degree that it would no longer be able to convey its significance.⁴¹ The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the historical resources in the vicinity, including their integrity of setting, and concluded that any impacts would be less than significant.

⁴⁰ U.S. Department of the Interior, National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, (Washington, DC: 1990; revised for Internet, 2002), www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, accessed October 3, 2023.

⁴¹ CEQA Guidelines Section 15064.5(b)(2).

Three historical resources located in the vicinity of the Project Site were called out for particular concern by the commenters, including the Rancho La Brea Adobe located immediately south of the Project Site; The Original Farmers Market located south of the Project Site at the northeastern corner of Fairfax Avenue and 3rd Street; and the Beverly Fairfax Historic District located north of the Project Site. These resources are discussed below.

Rancho La Brea Adobe (Gilmore Adobe)

Comments claim that direct impacts from vibration due to construction activity were not properly analyzed in the Draft EIR and vibration from construction has the potential to directly impact the Rancho La Brea Adobe (also referred to as the Gilmore Adobe) given its fragile adobe construction. Potential vibration impacts from construction activity were, in fact, analyzed in Section IV.I, Noise, of the Draft EIR with the Rancho La Brea Adobe specifically called out among the off-site historical resources included in the analysis. Vibration levels associated with the Project were found to be below the threshold for potential damage.

In addition to potential direct impacts from construction vibration, commenters also claim that the Project has the potential to result in significant indirect impacts to the Rancho La Brea Adobe by altering its immediate surroundings. The broad setting of the Rancho La Brea Adobe has been completely transformed since its original construction in the 19th century, as all the surrounding ranch land was developed and redeveloped over time. Construction of The Grove shopping and entertainment center, which opened in 2002 and includes a seven-story parking garage immediately east of the Rancho La Brea Adobe, is only the most recent example. Today, the Rancho La Brea Adobe is almost entirely enclosed by more recent retail and restaurant development (including back of house operations that are immediately adjacent to the Project Site) associated with The Grove, none of which reflects the scale, architecture, and historic characteristics of the Rancho La Brea Adobe. Therefore, the broader setting of the Rancho La Brea Adobe does not contribute to its historic significance given the existing condition.

Commenters claim that potential new construction associated with the Project, which would take place on a separate property, separated by an approximately 28-foot alley, north of the Rancho La Brea Adobe, would result in significant impacts because it would be “out-of-scale,” and “overshadow” this historical resource. However, as noted above, the comments do not provide any explanation as to what aspects of the immediate surroundings are instrumental in conveying the historic significance of this historical resource or how new construction located north of the Rancho La Brea Adobe would diminish its integrity. Instead, the commenters imply that the visibility of new construction alone would somehow adversely affect the integrity of the Rancho La Brea Adobe and threaten its eligibility for historic listing. However, none of the comments demonstrate how

the visibility of new construction would result in a substantial adverse change of the Rancho La Brea Adobe. Mere visibility of a new building, structure, or feature from various vantage points alone would not result in a significant impact to the Rancho La Brea Adobe. For a significant impact to occur, the integrity of the Rancho La Brea Adobe would have to be diminished to the degree that it would no longer be able to convey its significance.⁴² The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the Rancho La Brea Adobe, including its integrity of setting, and concluded that any impacts would be less than significant (refer to Draft EIR page IV.B-55 and Historic Report pages 87–88).

Commenters assert that taller, new construction north of the Rancho La Brea Adobe would constitute a significant impact under CEQA; however, this assertion is not substantiated by facts or analysis and is not based on the threshold in Appendix G of the CEQA Guidelines noted above. The commenters do not demonstrate how new construction constitutes a substantial adverse change that will materially impair the significance of the Rancho La Brea Adobe as CEQA requires. As demonstrated in the Draft EIR, the Rancho La Brea Adobe, including its component buildings, structures and associated outdoor spaces, would remain physically unchanged after implementation of the Project and the Rancho La Brea Adobe would continue to convey its historic significance. Therefore, impacts to the Rancho La Brea Adobe would be less than significant as defined by CEQA.

The Original Farmers Market

Comments claim that new construction associated with the Project would adversely affect The Original Farmers Market, which dates from 1934 and was largely completed by 1949. Commercial development constructed from roughly 1961 to 2012 has significantly altered the immediate surroundings of The Original Farmers Market. For example, The Grove project demolished the 1948 warehouse and 1953 tower building, both of which contributed to the historic setting of The Original Farmers Market. Further, the clock tower atop the tower building, a symbol of The Original Farmers Market, was removed and reconstructed at another location within the site.⁴³ As such, the broad setting of The Original Farmers Market does not contribute to its historic significance.

Commenters incorrectly assert that new construction at the Project Site, located over 500 feet to the north, would adversely affect the broad setting of The Original Farmers Market, despite the continued alteration of its immediate surroundings. The commenters

⁴² CEQA Guidelines Section 15064.5(b)(2).

⁴³ See The Grove at Farmers Market Addendum to Final Environmental Impact Report dated July 15, 1999 (EIR No. 87-515-SUB(ZV)(YV)(ZC); State Clearinghouse No. 87102102).

assert that the visibility of new construction alone would adversely affect the integrity of The Original Farmers Market and threaten its eligibility for historic listing. However, none of the comments demonstrate how the visibility of new construction would result in a substantial adverse change such that the physical characteristics of The Original Farmers Market that justify its inclusion in, or eligibility for, historic listing would be materially impaired. The broad setting of this historical resource has already been disrupted, most recently by development associated with The Grove.

The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of The Original Farmers Market, including its integrity of setting, and concluded that impacts would be less than significant.

Beverly Fairfax Historic District

Commenters claim that the Draft EIR failed to disclose adverse historical resource impacts to the National Register-listed Beverly Fairfax Historic District which is located north of Beverly Boulevard. As stated on page IV.B-31 of the Draft EIR and pages 41–42 of the Historic Report, the Beverly Fairfax Historic District is located north of Beverly Boulevard and does not include any parcels fronting Beverly Boulevard directly across the street from the Project Site. Therefore, there would be no potential for impacts as defined by CEQA due to the over 200-foot distance between the southern boundary of the Beverly Fairfax Historic District and the northern boundary of the Project Site, as well as the physical separation by the intervening buildings and Beverly Boulevard. A discussion of the Beverly Fairfax Historic District is included on page IV.B-31 of the Draft EIR.

As noted above, no evidence of material alteration of any of the contributing buildings within the Beverly Fairfax Historic District was identified by the commenters. Instead, criticism of the analysis focuses on potential aesthetic impacts. However, the introduction of a new visual feature in the vicinity of the Beverly Fairfax Historic District would not diminish its integrity of setting. The immediate setting would remain unchanged, and the broad setting is not a character-defining feature of the Beverly Fairfax Historic District. Thus, the mere visibility of a new building that may be constructed as part of the Project from certain vantage points within the Beverly Fairfax Historic District alone would not result in an impact. The Beverly Fairfax Historic District would not be materially impaired by the Project because it would continue to retain all of its character-defining features, convey its significance, and remain eligible for listing in the National Register and California Register and for designation as an HPOZ.

Comments suggesting that impacts to the setting of the Beverly Fairfax Historic District would be significant represent a lack of understanding of districts and how they are defined. NPS defines a district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical

development.”⁴⁴ Thus, a district derives its significance as a single unified entity. Boundaries for districts are selected to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects that contribute to the historic significance of the district and delineate the district from immediately surrounding areas of a different historic character or development pattern. NPS guidance on defining district boundaries state that boundaries should be drawn by observing the following:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new development, highways or development of a different character.
- Visual changes in the character of the area due different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
- Boundaries at a specific time in history such as the original city limits, or the legally recorded boundaries of a housing subdivision, estate, or ranch.
- Clearly differentiated patterns of historic development, such as commercial versus residential or industrial.⁴⁵

These tenets can be observed in the boundaries of the Beverly Fairfax Historic District, which exclude areas of different historic development patterns such as commercial development or areas of later development not associated with the period of significance for the Beverly Fairfax Historic District. In this manner, features associated with the historic significance of the Beverly Fairfax Historic District are necessarily included within the district boundaries. The broad setting (located outside the Beverly Fairfax Historic District boundaries) was appropriately not considered character-defining or important to the integrity of the Beverly Fairfax Historic District.

As stated above, the northern edge of the Project Site is located over 200 feet from the southern boundary of the Beverly Fairfax Historic District and no physical alterations or changes within the Beverly Fairfax Historic District boundaries are contemplated by the Project. As such, the Project cannot physically alter or change the setting of the Beverly Fairfax Historic District as all the setting features that contribute to the significance of the Beverly Fairfax Historic District are contained within its boundaries.

Finally, commenters claim that the potential cut-through trips “will result in significant and adverse land use impacts” and that the “excessive traffic burden” identified for several

⁴⁴ National Register Bulletin #15, p. 5.

⁴⁵ U.S. Department of the Interior, National Park Service, National Register Bulletin Defining Boundaries for National Register Properties, Washington D.C., revised 1997, p. 12.

streets that traverse the Beverly Fairfax Historic District in Section IV.K, Transportation, of the Draft EIR may result in “diminished integrity” and “disinvestment, decay and degradation of the physical environment” of the Beverly Fairfax Historic District. However, historical impacts and transportation impacts are analyzed separately, have different thresholds, and are not equivalent in their definition of integrity. No explanation is provided as to how increased trips through the Beverly Fairfax Historic District might translate to physical demolition, destruction, relocation, or alteration such that the significance of the Beverly Fairfax Historic District would be materially impaired, which is the threshold for significant impacts on historical resources in Appendix G of the CEQA Guidelines. While the transportation analysis makes clear that a potential result of the Project, which would include a Neighborhood Traffic Management Plan and would not result in significant transportation impacts under CEQA, is more vehicle trips within the Beverly Fairfax Historic District, no evidence has been identified to suggest that a potential increase of vehicle trips would result in the substantial adverse change of the physical characteristics of the Beverly Fairfax Historic District that convey its historic significance and that justify its inclusion in, or eligibility for, listing as a historical resource as defined by CEQA.⁴⁶

⁴⁶ The Neighborhood Traffic Management Plan is discussed in Topical Response No. 9.

Topical Response No. 6. Wilshire Community Plan Update

Commenters state that the Project should not be permitted because the Wilshire Community Plan, which is the applicable General Plan land use element for the Project Site, was adopted in 2001 and needs to be updated. Specifically, commenters state that the proposed General Plan Amendment is impermissible “spot-zoning” and “upzoning” that should not be considered outside of the context of a long-overdue update to the Wilshire Community Plan, and that the proposed General Plan Amendment represents a major change to the identity of the area and its future growth potential that should occur in the context of comprehensive planning (i.e., an update to the Wilshire Community Plan).

However, CEQA requires an evaluation of a project’s consistency with existing land use plans, and that evaluation is not affected by possible changes to an existing land use plan that may be adopted in the future. In accordance with CEQA Guidelines Section 15125, the Draft EIR for the Project properly relied on information that is currently available to establish baseline conditions and, as such, used information from the existing Wilshire Community Plan, satisfying the requirement under CEQA Guidelines Section 15125(d) that an EIR “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” An “applicable” plan is a plan that has already been adopted and thus legally applies to a project; draft plans need not be evaluated—an existing land use plan does not become “inapplicable” because of the passage of time. Statutory law contains no requirement that a general plan’s land use element—which is the City’s Wilshire Community Plan—be updated at any given interval or in connection with any given event (such as the approval of a new development project). Further, unlike certain General Plan elements such as the Housing Element, state law does not require that local jurisdictions regularly update their land use element within certain timeframes.⁴⁷

For these reasons, an “applicable” plan under CEQA is a plan that has already been adopted and thus legally applies to a project; draft plans need not be evaluated. The Wilshire Community Plan is not currently being updated, nor has the City publicly notified or

⁴⁷ For informational purposes only (and not relevant to the Draft EIR’s evaluation of the Project’s consistency with the existing Wilshire Community Plan), please note that Chapter 1 of the City’s General Plan Framework Element states that, “[l]ike all general plan elements, community plans are comprehensively updated on a periodic basis through a city-initiated process. However, given the size and complexity of the City, the process of updating all of them takes time.” Chapter 1 of the General Plan Framework Element further states that “[s]ubject to availability of funding, all comprehensive updates of the citywide elements and the community plans for the purpose of implementing the Framework Element shall be initiated within five years of adoption of the Framework Element. Phasing of such updates may be made in accordance with Objective 3.3. and Policies 3.3.1 and 3.3.2 based on the monitoring of population, development, and infrastructure and service capacities as recommended through the Annual Report on Growth and Infrastructure.”

initiated an update to the Wilshire Community Plan, and the timing of such an update is unknown. In any instance where a community plan has yet to be updated and adopted, a draft plan would not be applicable under CEQA. Accordingly, comments that the Wilshire Community Plan is in need of an update are not relevant to the environmental analysis of the Project. In fact, consideration of an unknown future community plan update would be contrary to CEQA, which prohibits speculation and conjecture.⁴⁸ Further, there would be no legal basis and it would be contrary to City policy for the City to require that an individual project be delayed until the completion of an update to a community plan which has not yet commenced publicly and will take numerous years to complete.

⁴⁸ CEQA Guidelines § 15187(d).

Topical Response No. 7. Mobility Hub

This Topical Response has been prepared to address questions and comments regarding the Project's proposed Mobility Hub. Commenters requested an explanation of the proposed activities to be provided in the Mobility Hub, as well as the potential air quality and noise impacts. Commenters also expressed concern that the Mobility Hub would serve as a point of congregation for loitering. For informational purposes and in response to comments on the Draft EIR, this Topical Response provides an explanation of the form and functions, as well as additional details, of the proposed Mobility Hub.

The Draft EIR concluded that the Project's transportation impacts would be less than significant during both Project construction and operation (see Section IV.K, Transportation, of the Draft EIR). Nevertheless, the Applicant has committed to implementing a robust and extensive Transportation Demand Management (TDM) Program as Project Design Feature TR-PDF-2 to reduce dependency on individual car trips and encourage alternative modes of transportation.⁴⁹ One of the key elements of the Project's TDM Program is the inclusion of a multi-modal Mobility Hub on the Project Site. The Mobility Hub functions that will be provided as part of the Project are discussed in Section II, Project Description, and Section IV.K, Transportation, of the Draft EIR. As discussed therein, the Mobility Hub functions would support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and support other modes of travel and TDM strategies that are likely to evolve over time. These features would be promoted and incentivized through programs administered by an on-site TDM coordinator and one or more transportation information kiosks, including within the Mobility Hub itself.

First/last mile services would include personal transportation options such as motorized and non-motorized scooters, skateboards, and bicycles, both personally owned and as short-term rentals (e.g., bike share services). The Mobility Hub would also provide an off-street area for Project employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share services, taxis, and other commercial and non-commercial vehicles, as well as the temporary parking of shuttle and private subscription buses. In particular, the Mobility Hub would support shuttle service between the Metro D (Purple) Line Wilshire/Fairfax Station, currently under construction, and the Project Site, as well as future shuttle services connecting to other existing and/or future transit stations (e.g., the Metro B (Red) Line or Metro K (Crenshaw/LAX) Line North Extension). Furthermore, the Mobility Hub would accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. Such amenities would

⁴⁹ All PDFs are included in the Mitigation Monitoring Program for the Project, included as Section IV of this Final EIR, to ensure their implementation.

include a transportation information center providing real-time transit information via digital bulletin boards, wayfinding information for nearby transit stops, and bicycle-related services such as valet service, repair stands, showers, and lockers. The primary Mobility Hub would also be one of the main locations for pedestrian and audience entry into the Project Site and would allow for their efficient and secure entry. Additional functions to be provided at the Mobility Hub are detailed in the proposed TDM Program set forth in Project Design Feature TR-PDF-2 on pages IV.K-37 to IV.K-40 of the Draft EIR.

Consistent with the City's guidance on the development of Mobility Hub amenities, activities, and programs to support multi-modal connectivity and access, the proposed Mobility Hub functions are flexible. The City's Mobility Hubs Reader's Guide states that "[t]he ability of the Hub to function successfully depends on flexibility. It is the interaction and balance between transportation, land use, and placemaking functions. Flexibility for change should be incorporated in developing Mobility Hubs to accommodate possible future growth, expansion, and changes as new technologies evolve."⁵⁰

Location

The primary Mobility Hub functions are currently proposed in the southwest corner of the Project Site, near the intersection of Fairfax Avenue and 1st Street. A new traffic signal would be installed at this intersection as part of the Project, which would allow vehicles to access the Fairfax Avenue corridor more easily and safely. This location would provide a direct connection to the planned Metro D (Purple) Line Wilshire/Fairfax Station, currently under construction, and could also potentially provide a connection to the Metro K (Crenshaw/LAX) Line if the proposed extension along Fairfax Avenue is selected. The Fairfax Avenue corridor has a high concentration of pedestrian destinations, so it would be beneficial to locate the Mobility Hub transportation functions in this area.

Figure II-1, Mobility Hub Conceptual Plan, on page II-110 shows the layout of the at-grade Mobility Hub on the Project Site immediately adjacent to the intersection of Fairfax Avenue and 1st Street. Direct access from the signalized intersection of Fairfax Avenue and 1st Street would provide entry and exit for shuttle buses and areas for visitor/audience pick-up and drop off, as well as rideshare pick-up and drop off areas. Bicycle facilities would also be provided. This design was presented in the Transportation Assessment (Appendix M.1 of the Draft EIR). Figure II-2, Mobility Hub Rendering, on page II-111 shows a rendering of the Mobility Hub as viewed from the west side of Fairfax Avenue at 1st Street. The Mobility Hub is intended to be built at the ground level along Fairfax Avenue and incorporated into the office building or stage building built above it.

⁵⁰ Los Angeles Department of City Planning Urban Design Studio, *Mobility Hubs: A Reader's Guide*, p. 5.

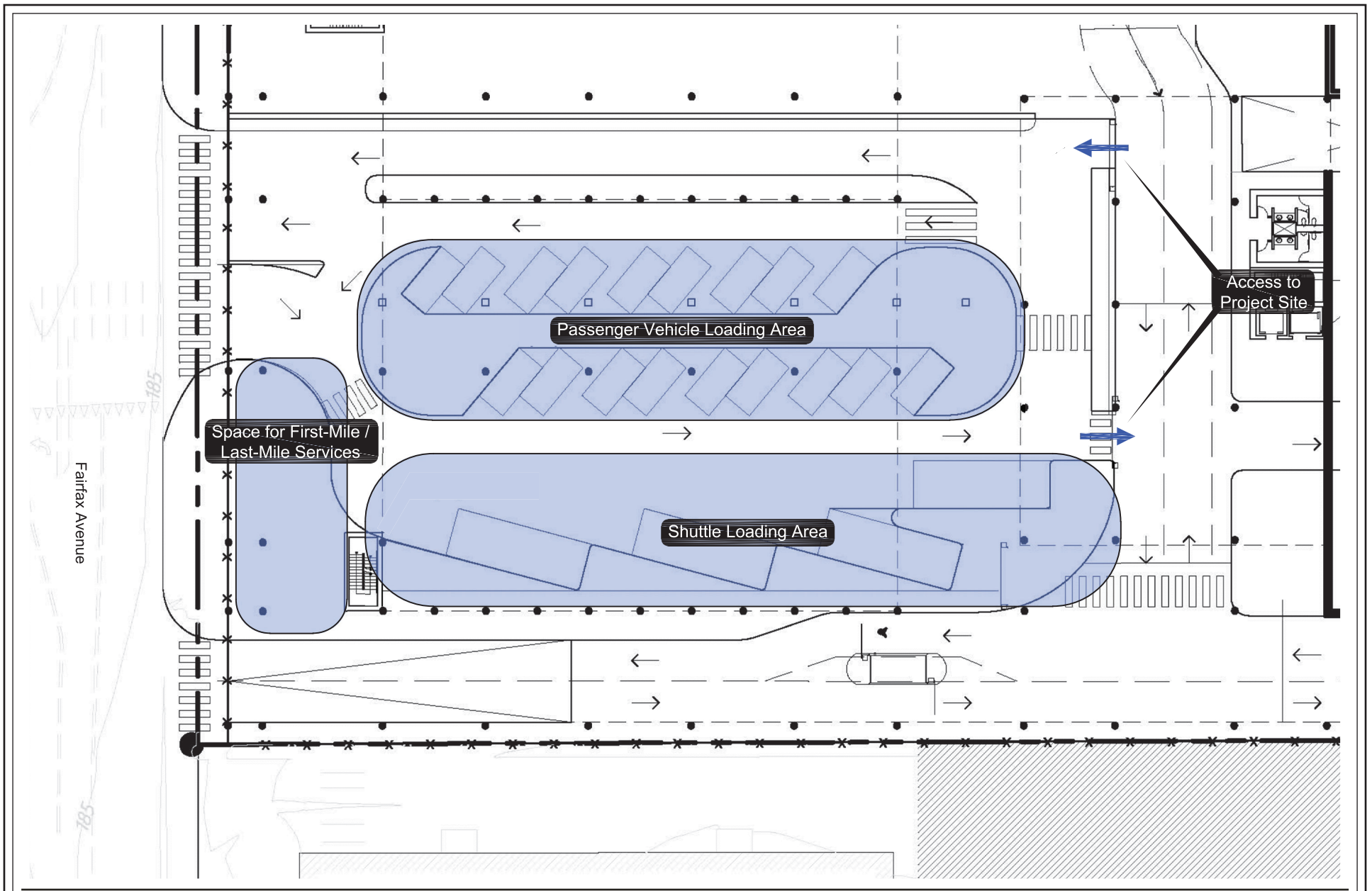


Figure II-1
 Mobility Hub
 Conceptual Plan Layout



Figure II-2
Mobility Hub Rendering

While the primary location for the Metro D (Purple) Line Wilshire/Fairfax Station shuttle bus service would likely remain in the southwest portion of the Project Site, a portion of the bicycle, rideshare, and visitor drop-off functions may be distributed across the Project Site to directly link mobility uses with primary destinations.

Implementation Overview

If the Project is built in a single phase, the Mobility Hub would be incorporated into the design of the building in the southwest portion of the Project Site as shown in the Conceptual Site Plan, with ancillary mobility functions located along the circulation system in the central and/or eastern portions of the Project Site. All key functions of the Mobility Hub would be available with the initial re-occupancy of the Project Site.

If the Project is constructed in multiple phases, the functions of the Mobility Hub would begin with the first phase of the Project regardless of the type of studio land use(s) being newly constructed. Under the long-term buildout scenario, the Mobility Hub would be located in the southwest portion of the Project Site, served by the new traffic signal at Fairfax Avenue and 1st Street. As shown in Figure II-1 and Figure II-2 on pages II-110 and II-111, the Mobility Hub would be constructed at the grade level of Fairfax Avenue with access directly from the proposed traffic signal at Fairfax Avenue and 1st Street. If the building in the southwest corner of the Project Site is not constructed during the initial construction phase, the Mobility Hub functions would be temporarily located within the internal circulation network within the Project Site, but in a location still served by the signalized Fairfax Avenue/1st Street Project Site entrance. Once the southwest building is complete, the Mobility Hub would move to its ultimate location on the ground floor of the building in the southwest portion of the Project Site.

Regardless of the format or location of the Mobility Hub, the key Mobility Hub functions would be offered to Project employees and visitors from the beginning of occupancy of the multi-phase construction.

- TDM elements like bicycle parking, rideshare pick-up/drop off, a transit information center and visitor drop off that could ultimately be located in the permanent Mobility Hub would be located at different locations throughout the Project Site, beginning with the first phase of the development process, in order to get these early elements closer to the initial developments, as necessary.
- Shuttle bus connections to the Metro D (Purple) Line Wilshire/Fairfax Station would begin with the development of net new sound stages, production office, or general office⁵¹ of at least 100,000 square feet.

⁵¹ Production support and retail uses would not trigger construction of the Mobility Hub.

Operation and Design

Figure II-1 and Figure II-2 on pages II-110 and II-111 show the location and basic layout of the proposed Mobility Hub as well as the view of the facility from Fairfax Avenue. Figure 3 and Figure 4 on pages 14 and 15 of the Transportation Assessment (Appendix M.1 of the Draft EIR) show the pedestrian connections between Fairfax Avenue and the entrances to the Project Site. The Mobility Hub would include internalized secure pedestrian entrances to the Project Site where employees and visitors could check in through a security gate. This pedestrian entrance would connect to all the areas of the Project Site. During off-peak times, including nights and weekends, it is anticipated that gate controls and other security measures would be utilized to secure the Project Site boundary and maintain a high level of safety.

The Mobility Hub would be open during the primary hours of operation for the Project. Shuttle buses from the Project Site to the Metro D (Purple) Line Wilshire/Fairfax Station would be most active during the primary commute hours in the morning (from approximately 6 A.M. to 9 A.M.) and afternoon (from approximately 3 P.M. to 7 P.M.) peak hours. During the mid-day hours, a more limited service would be provided. Limited evening service could be offered on those days when evening audience shows were taping. While the Project Site would continue to operate 24 hours a day, the activity at the Mobility Hub is expected to be minimal during the nighttime hours and may even be closed for security purposes.

Commenters expressed concern that the Mobility Hub would serve as a congregation point for loitering. However, this would not be the case. The Mobility Hub would serve the employees and visitors to the Project Site and would not be open to the general public without authorized access. The Mobility Hub would be located on private property that would have 24/7 security. Further, the primary location of the Mobility Hub immediately adjacent to the security check point for the Fairfax Avenue entrance to the Project Site would provide the Mobility Hub area with a high degree of security coverage by campus security. The Mobility Hub would incorporate other safety features (e.g., strategic lighting; security personnel; security cameras; etc.) and would have the ability to be fully secured if needed in response to an emergency event.

Commenters expressed concern about potential noise impacts from the Mobility Hub on adjacent properties. However, the primary Mobility Hub in the southwest portion of the Project Site is intended to be located on the ground floor of a sound stage or office building within the building envelope which would greatly minimize any noise impacts. Figure II-2 shows the location of the proposed Mobility Hub on the ground floor of an office or stage building. The Mobility Hub itself would be partially open to the outside with driveways and pedestrian connections from the Fairfax Avenue sidewalk and from the Project Site into the Mobility Hub. The Mobility Hub would be located at the grade level of Fairfax Avenue with

direct pedestrian, bicycle, and vehicular connections to Fairfax Avenue. The potential noise from the functions of the Mobility Hub would be effectively contained within the Project Site and would be shielded by new structures/walls to the north, east and south. The western portion of the Mobility Hub along Fairfax Avenue would include screening/landscaping along those areas not dedicated to vehicular, bicycle and pedestrian access. As shown in Figure II-2 on page II-111, much of the Mobility Hub's western façade would be partially open to the air and would also include air quality controls in accordance with all existing applicable regulatory requirements. For those portions of the TDM functions that are spread throughout the Project Site, the Project would not operate bus or shuttle loading/unloading within 75 feet of the Broadcast Center Apartments without a noise barrier, in order to address concerns from the residents about potential noise impacts (refer to Project Design Feature TR-PDF-2 in Section III, Revisions, Clarifications, and Corrections to the Draft EIR).

Topical Response No. 8. Vehicle Miles Traveled

Comments questioned the validity of the Vehicle Miles Traveled (VMT) analysis presented in the Draft EIR and suggested that the Draft EIR's VMT analysis conceals a significant impact by excluding Project components. However, the analysis was conducted appropriately, as described in this Topical Response. Pursuant to SB 743, the transportation impact analysis required under CEQA was changed from vehicular delay (i.e., Level of Service [LOS]) to VMT. Accordingly, the Project's transportation analysis and potential impacts were assessed in the Draft EIR using VMT methodology in accordance with CEQA and the City of Los Angeles Department of Transportation (LADOT). As discussed on pages IV.K-72 through IV.K-77 of the Draft EIR, the Project would have a less than significant VMT impact. Although no longer a CEQA transportation impact, the Transportation Assessment (Appendix M.1 of the Draft EIR) contains an operational evaluation of LOS of key intersections in the vicinity of the Project Site.

A. Appropriateness of Using VMT Calculator

Public comments claimed that the City's VMT Calculator tool should not have been used to analyze VMT for the Project. The primary objection was that the VMT Calculator is not suitable for analyzing specific plans or entertainment projects. Other objections included that the Project would have such an effect on population and workforce distribution that it would invalidate the VMT Calculator's internal model and that the VMT analysis should have been conducted using empirical trip length data. However, each of these claims are incorrect for the reasons discussed below:

Specific Plan

The claim that the City's VMT Calculator documentation recommends against the use of the VMT Calculator to analyze specific plans, and thus should not have been used to analyze the Project, is incorrect. The VMT Calculator is designed to analyze development projects as defined in LADOT's *Transportation Assessment Guidelines* (August 2022) (TAG), including those that would be implemented through a specific plan. The City recommends the use of the VMT Calculator for projects like the Project, and LADOT approved this methodology for the Project as part of the approved Memorandum of Understanding (MOU), which is included as Appendix A of the Transportation Assessment (Appendix M.1 of the Draft EIR).

As stated on page 1 of the *City of Los Angeles VMT Calculator User Guide Version 1.3* (LADOT, May 2020) (VMT Calculator User Guide), "[t]he VMT Calculator tool is specifically designed and intended to be used to develop project-specific daily household VMT per capita and daily work VMT per employee metrics for residential and office land use development projects in the City of Los Angeles. It implements the methodologies,

screening criteria, and impact significance thresholds described in Section 2.2 of LADOT's Transportation Assessment Guidelines for residential and employment projects." The VMT Calculator calculates the following six categories of trips for every combination of land uses on a proposed project, to the extent that each type of trip is applicable to that project:

- Home-Based Work Productions
- Home-Based Other Productions
- Non-Home-Based Productions
- Home-Based Work Attractions
- Home-Based Other Attractions
- Non-Home-Based Attractions

The cumulative total of these trip types represents the 24-hour average daily trip (ADT) generation of the Project and therefore the ADT trip totals for the Project calculated by the VMT Calculator includes all trips generated by the proposed Project (employment, visitor, audience, production vehicles, deliveries, etc. in the case of the Project). These ADT trip totals, based on all six categories of trips, are used in the air quality, noise and GHG analyses in the EIR. However, the transportation impacts of a potential project are based on a more focused evaluation of a subset of the six trip categories, as described below.

For the CEQA transportation impact analysis, pursuant to the City of Los Angeles VMT Calculator Documentation, VMT impacts are evaluated by comparing the daily household VMT per capita and/or the daily work VMT per employee with the City of Los Angeles VMT impact criteria for the applicable Area Planning Commission (APC) area. Not all trip types are used in the VMT per capita calculations. For a project with a residential component, the VMT Calculator calculates the household VMT per resident by adding the Home-Based Work Production VMT and the Home-Based Other Production VMT and dividing by the total resident population. For a project with an employment component, the VMT Calculator calculates the work VMT per employee by dividing the Home-Based Work Attraction VMT by the number of employees. The other three trip types—Home-Based Other Attractions and Non-Home-Based Productions and Attractions—are not factored into the VMT analysis for the purposes of assessing CEQA transportation impacts. This is consistent with the recommended VMT analysis methodology in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory), which suggests

that, for employment-based projects, “the focus can be on home-based work trips.”⁵² The other trip types are considered by the OPR Technical Advisory to be a relatively small component of overall VMT, and the focus of VMT-reduction efforts are on trips between home and work.

The VMT Calculator then compares those numbers to the VMT impact thresholds for the applicable APC area. The Project Site is located in the Central APC area, which has a daily work VMT per employee threshold of 7.6. The Project does not include residential uses; therefore, the daily household VMT per capita threshold is not applicable to the Project. As stated in Table IV.K-5, Project VMT Analysis Summary, on page IV.K-76 of the Draft EIR, the Project would generate a total of approximately 13,454 daily vehicle trips and a total of approximately 95,865 daily VMT. However, as stated on page 19 of the VMT Calculator Documentation, the Project’s VMT impact is calculated based on the Home-Based Work Attraction VMT, consistent with the methodology used to develop the City’s daily work VMT per employee impact threshold. As stated in Table IV.K-5, the VMT Calculator measured a total of approximately 52,194 work VMT generated by approximately 7,832 employees, for an average of 6.7 work VMT per employee. This is below the VMT impact threshold of 7.6 work VMT per employee for the Central APC area. Therefore, as stated in Section IV.K, Transportation, of the Draft EIR, the Project’s VMT impact would be less than significant. The VMT analysis is summarized in Section IV.K, Transportation, and Appendix M of the Draft EIR (Table 13 and presented in more detail in Appendix E of the Transportation Assessment [Appendix M.1]).

The VMT Calculator User Guide states on page 2 that “[the VMT Calculator] is not designed to...evaluate VMT impacts of land use plans (e.g., general plans, community plans, and specific plans).” It does not say individual development projects proposing a new specific plan should not be analyzed. The LADOT guidance makes a distinction between land use plans that cover large areas of the City and multiple property owners. For example, in the case of the Wilshire Community Plan, approximately 8,954 acres (or about 14 square miles); in the case of the Mobility Element of the City’s General Plan, 502 square miles; or in the case of the LAX Specific Plan, approximately 3,500 acres (or about 5.5 square miles), versus individual development sites such as studio campuses where the VMT Calculator has been utilized with LADOT’s concurrence. As described below, LADOT has approved the use of the VMT Calculator for several large projects similar to the Project.

The VMT Calculator User Guide only holds up a specific plan as one example of something that *could potentially be* a land use plan but is not *necessarily* so. Section 2.2 of the TAG clearly differentiates a land use plan from a development project, which it defines

⁵² OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf, accessed September 6, 2023.

as “any proposed land use project that changes the use within an existing structure, creates an addition to an existing structure, or new construction, which includes any occupied floor area” (emphasis added). The Project is clearly a development project as defined in the TAG, implemented within the regulations defined by a specific plan, which creates specialized zoning and other regulations on a certain parcel or set of parcels. Even the OPR Technical Advisory states on page 18 that “analysis of specific plans may employ the same thresholds described above for projects.”

The VMT Calculator User Guide recommends against using the VMT Calculator for analysis of a large-scale land use plan, as noted above, because the VMT Calculator is not designed to analyze such a plan that could have a major effect on regional or sub-regional demographics and traffic patterns, as explained below. As noted in several of the comments, the VMT Calculator is based on a static model, meaning it does not model changes in regional demographics or travel patterns that could result from the project it is analyzing. Therefore, a project that is of such a scale that it could change those regional demographics in a meaningful way could potentially be inaccurately analyzed using the VMT Calculator. An example of this type of demographic change would be an employment project adding tens of thousands of jobs to a remote rural or suburban area that would cause thousands of people to move their place of residence. Similarly, a project that may result in major transportation infrastructure changes (as can be the case with a major transportation infrastructure project like a new rail line or large-scale land use plan located in a remote suburban area) could not be accurately analyzed using the VMT Calculator. None of these circumstances apply to the Project because the Project is an infill land use project located on a single block in an urban area that is supported by the existing and new transportation infrastructure under construction in the area. The Project is simply not large enough to change the regional or sub-regional demographics of this existing urbanized and dense Central APC area of the City, nor would it result in potentially substantial transportation system infrastructure changes that would alter regional travel patterns compromising the suitability of the VMT Calculator for its analysis. The fact that a development project as defined in the TAG is implemented through a specific plan does not undermine its suitability for analysis using the VMT Calculator. The TAG contemplates that a project will qualify as either a development project or a land use plan, but not both. Where, as here, the Project fits within the definition of “development project,” the VMT Calculator is properly applied regardless of whether the Project is to be implemented by a specific plan.

The Project proposes to modernize and expand the existing studio by building new sound stages, production support, production office, general office, and retail uses. The general studio use of the Project Site would remain unchanged. The only new land uses that do not exist on the Project Site today are up to 20,000 square feet of retail space, as well as a potential ancillary childcare use. Though it would be new to the Project Site, retail

space is common along the arterial streets in the vicinity of the Project Site, including directly across the street on both Beverly Boulevard and Fairfax Avenue.

The Project would not result in changes to transportation infrastructure or the types of employees and visitors at the Project Site (except the retail space, which, as noted, is a common use in the vicinity). There is also no prescribed limit on the maximum size of development that may be analyzed using the VMT Calculator, and the Project is certainly not of such a scale as to change any of the fundamental assumptions built into the VMT Calculator. Nor is the Project large enough to change the regional or sub-regional demographics or the transportation infrastructure in the Central APC area. The VMT Calculator has already been used to analyze several other large projects in Los Angeles where, despite their size, LADOT determined that the VMT Calculator was the appropriate tool for the analysis, as these projects would not change the demographic or the travel patterns in the area. These include, but are not limited to, the following projects:

- 670 Mesquit Street near downtown, a mixed-use development constructing a net of approximately 1,790,000 square feet of residential, office, hotel, commercial, and event space.
- Angels Landing Project, a transit-oriented mixed-use development constructing up to approximately 1,270,000 square feet of residential, hotel, and commercial space.

The VMT Calculator has been approved by LADOT for use in several studio projects approved in the City of Los Angeles including:

- Sunset Gower Studios in Hollywood will have 1.1 million square feet of studio and production space on a 17.4-acre site. It was approved for expansion in 2021.
- 8th and Alameda Studios, which includes the renovation and construction of approximately 832,190 square feet of floor area for studio uses on a 26-acre site, was approved in 2022.

Nothing about the type of development or size of development proposed at the Project Site precludes the use of the VMT Calculator. As shown above, LADOT has already approved the VMT Calculator for use in large and smaller studio projects within the City.

The comments that the level of visitor traffic and the presence of audience trips precludes the use of the VMT Calculator is not consistent with previous decisions by LADOT, as evidenced by the number of times LADOT has approved the VMT Calculator for use in studio projects. As described below in Topical Response No. 10, Trip

Generation, the visitor and audience trips make up a small percentage of the total trips to/from the Project Site. Importantly, per the OPR Technical Advisory, the VMT analysis is based on the employee VMT from their homes to the Project Site. Thus, the small number of non-employee trips does not affect the VMT per employee calculations and conclusions.

Some comments objected to the use of the VMT Calculator because the proposed Specific Plan would allow a shift in land uses and, if that occurred, the Project could produce greater VMT impacts than were analyzed in the Draft EIR. This concern will not materialize because the Draft EIR's transportation analysis, which is included in Section IV.K, Transportation, and Appendix M of the Draft EIR, encompasses the maximum potential transportation impacts of the Project and therefore presents the most conservative analysis of future development under the Specific Plan. The transportation analysis assumed buildout of the maximum area that would be permitted under the Specific Plan (1,874,000 square feet), including the maximum amount of general office and production office that would be permitted under the Specific Plan (700,000 square feet each), which have higher employee and trip generating characteristics per square foot of development than sound stages and production support space (which, under the Specific Plan, are allowed to be increased by decreasing the amount of the other permitted land uses, as discussed below). The transportation analysis also assumed high-generating uses for the 20,000 square feet of retail space, which was conservatively input in the VMT Calculator as 100-percent high-turnover restaurant.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a Land Use Exchange Program that provides limited flexibility in the size of certain studio uses.⁵³ Specifically, the Land Use Exchange Program would permit limited increases in sound stage and production support floor area in exchange for equivalent decreases in the size of the other permitted land uses (the Project's five land uses include sound stage, production support, production office, general office, and retail). In addition to analyzing the proposed development program (i.e., Conceptual Site Plan), which is set forth in Table II-2 on page II-13 and Figure II-4 on page II-14 in Section II, Project Description, of the Draft EIR, the transportation analysis also analyzed two land use scenarios that would be permitted under the Land Use Exchange Program and represent the most impactful land use scenarios by certain metrics (i.e., total VMT or work VMT per employee) due to the number of employees and number of trips these scenarios would generate (these two scenarios are referred to herein as the "maximum transportation impact scenarios"). This analysis is provided in the Draft EIR on pages IV.K-75 through IV.K-77 and includes a sound stage–

⁵³ The Land Use Exchange Program is included in the Preliminary Draft Specific Plan, which has been made publicly available prior to the publication of this Final EIR; refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

heavy scenario and a production support–heavy scenario. As with the proposed development program, the maximum transportation impact scenarios assumed the maximum permitted office floor area and used the high-turnover restaurant rate for the retail use. Table II-2 on page II-122 includes the square footage breakdowns of the land use scenarios that were evaluated in the Draft EIR’s transportation analysis.⁵⁴

The maximum transportation impact scenarios were analyzed in order to provide a comprehensive and conservative analysis. Although these scenarios would be permitted under the Land Use Exchange Program set forth in the Preliminary Draft Specific Plan, they do not represent likely or viable development scenarios, as a balance of sound stages and production support uses are necessary for a functioning studio campus and in order to meet the Project objectives set forth in Section II, Project Description, of the Draft EIR. However, these scenarios were analyzed because they would result in certain greater VMT impacts than the proposed development program. As discussed on page IV.K-77 of the Draft EIR, maximum transportation impact scenario 1 would result in higher total VMT (but lower work VMT per employee) than the proposed development program, and maximum transportation impact scenario 2 would result in higher work VMT per employee (but lower total VMT) than the proposed development program. Nevertheless, as detailed in the Supplemental VMT Memo included in Appendix M.3 of the Draft EIR, the maximum transportation impact scenarios would not exceed the City’s CEQA significance threshold of 7.6 work VMT per employee for the Central APC area. As such, the maximum possible VMT impact associated with the Project would be less than significant.

⁵⁴ Please refer to Appendix FEIR-3, Maximum Impact Scenario, for a discussion of the maximum impact scenarios that were analyzed for each environmental topic.

Table II-2
Draft EIR Proposed Development Project and Maximum Transportation Impact Scenarios

	Proposed Development Project	Maximum Transportation Impact Scenario 1	Maximum Transportation Impact Scenario 2
Sound Stage	350,000 sf	450,000 sf	0 sf
Production Support	104,000 sf	4,000 sf	454,000 sf ^a
Production Office	700,000 sf	700,000 sf	700,000 sf
General Office	700,000 sf	700,000 sf	700,000 sf
Retail (high-turnover restaurant)	20,000 sf	20,000 sf	20,000 sf
Total Work VMT	52,194	52,762	50,203
Work VMT per Employee	6.7	6.4	7.6
Impact Threshold	7.6	7.6	7.6
Significant Impact	No	No	No
^a The Land Use Exchange Program analyzed in the Draft EIR did not include a maximum limit on production support floor area; rather, only sound stage floor area was limited (to a maximum of 450,000 square feet). The Draft EIR analyzed maximum transportation impact scenario 2 including 454,000 square feet of production support floor area. However, in response to comments on the Draft EIR, the Land Use Exchange Program was subsequently revised to limit production support floor area to a maximum of 450,000 square feet. This change would not alter the significance of the maximum transportation impact scenario analysis. Source: Gibson Transportation Consulting, Inc., 2022.			

Event Center/Regional-Serving Entertainment

Comments claim that the Project is an “event center” or “entertainment project” and thus cannot be analyzed by the VMT Calculator. However, event center and entertainment uses are different than the existing studio uses and the proposed continuation of those studio uses. Section 2.2.4 of the TAG states, “[t]rips associated with [event centers and regional-serving entertainment venues] are typically discretionary trips made by individuals” (emphasis added) as opposed to the employment-based land uses proposed on the Project Site. Unlike an event center, the Project’s five land uses (i.e., sound stage, production support, production office, general office, and retail) would not attract substantial levels of discretionary visitor trips from members of the public. The vast majority of daily trips would be by employees to and from the Project Site. As described on page II-10 of the Draft EIR, the purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site. Further, the specific objectives outlined in that section of the Draft EIR clearly focus on developing a studio campus centered around the production of media for entertainment, rather than providing entertainment directly to the public. Project objectives include:

- “[Retain] the Project Site’s land use as a studio facility”;
- “Provide maximum opportunity for productions to be filmed in the region”;
- “[Provide] new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices”; and
- “Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.”

The distinction between an event or entertainment project open to the public as defined in the TAG and an entertainment and media-creation project such as the proposed studio Project is an important one. The TAG is clear that event or entertainment projects are not suitable for analysis using the VMT Calculator because most of the trips they generate are visitor trips, which the VMT Calculator is not designed to model. Unlike an event center or regional-serving entertainment venue, production studio uses do not attract regional visitor-based trips in significant quantities and frequencies. While the Project proposes to develop production stages and supporting uses which could be used in limited capacities for studio audiences or for occasional, City-permitted special events, the vast majority of Project trips (over 97 percent as identified in Topical Response No. 10, Trip Generation) would be generated by studio employees. While the visitor and audience trips were accounted for in the development of the daily trip volumes, and were therefore included in the air quality, noise and transportation operational analyses, the VMT Calculator is specifically designed to analyze VMT associated with employees throughout the City because those are the types of trips that are analyzed as part of the CEQA transportation evaluation for employment centers.

More information on visitor and audience trips can be found in Topical Response No. 10, Trip Generation.

B. Range of Allowable Land Uses in Specific Plan

Public comments claimed that the proposed Specific Plan would allow a wide range of land uses that were not analyzed in the VMT analysis, especially those uses which include a visitor component (audience shows, special events, e-sports events, and other uses permitted in the C2 zone). These comments incorrectly imply that the Specific Plan would permit land uses that would attract thousands of daily visitors. The Specific Plan would permit the uses that are proposed by the Project and are detailed in Section II, Project Description, of the Draft EIR. The list of allowable uses has been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As described therein, the Project’s uses are comprised of sound stages, production support, production office, general office, and retail uses, as well as ancillary and related sitewide uses that

support the studio and the five studio land uses (i.e., automobile parking and storage, basecamps that are ancillary to the sound stages, communication facilities, etc.). The retail uses that would be permitted under the Specific Plan would be limited to a maximum of 20,000 square feet (less than 2 percent of the total permitted floor area), as described in the Draft EIR Project Description. Thus, the land uses that would be permitted under the Specific Plan are consistent with the existing land uses with the exception of retail, which is intended to activate the frontage along Beverly Boulevard and/or Fairfax Avenue, as well as to potentially provide internal serving ancillary retail (i.e., TVC gift shop) for studio visitors. Refer to Topical Response No. 3, Permitted On-Site Uses.

As discussed above, the primary purpose of the Project is to continue the existing studio use and to modernize and enhance production facilities within the Project Site. The concerns expressed by the commenters center around the misconception that by developing under a specific plan, the Project would be able to shift land uses away from those studied in the Draft EIR and instead develop any land uses that are permitted under the existing zoning for the Project Site. If this were the case, the concern is that the VMT analysis presented in the Draft EIR may not be valid for an adjusted set of land uses. This concern is unfounded for two reasons. First, as described above, the proposed Specific Plan would limit the permitted land uses to those analyzed in the Draft EIR (sound stage, production support, production office, general office and retail uses), and the transportation analysis accounts for all permitted land uses. Second, under the Specific Plan, any future development proposal that substantially differs from the proposed Project analyzed in the EIR, and proposals that involve a land use exchange, would require a future discretionary review, including potential future CEQA compliance review.

The transportation analysis in Section IV.K, Transportation, of the Draft EIR accounted for all permitted land uses and relied upon conservative assumptions. It analyzed both the proposed development project, as well as land use exchange scenarios that would generate the maximum potential transportation impact, and, thus, the Draft EIR analyzed and disclosed the full range of potential transportation impacts associated with the Project. The comments have expressed concern about large visitor-attracting land uses like sports arenas and 3,000-seat auditoriums, but none of these uses would be allowed by the proposed Specific Plan. The analysis of the 20,000 square feet of retail space in the Project was evaluated as high-turnover restaurant space, one of the highest trip generating categories of retail/commercial land uses. Thus, the Draft EIR has conservatively evaluated very high trip-generating uses for the 20,000 square feet of retail. The retail land use, which would be limited to less than 2 percent of the total permitted floor area, was accounted for and analyzed throughout the Draft EIR. The TAG considers retail space under 50,000 square feet to be local-serving and thus would not attract regional trips that could increase VMT. Also refer to Topical Response No. 4, Permitted On-Site Uses, for details regarding the Draft EIR's analysis of all permitted on-site uses.

C. Assumptions in the VMT Analysis

Employee Trip Length

The VMT analysis results for the Project are provided in Table IV.K-5 in the Draft EIR. As shown therein, the Project is estimated to generate an average 6.7 work VMT per employee,⁵⁵ which is below the significant impact threshold of 7.6 work VMT per employee. Several comments appear to interpret this result as meaning that employees on average live 3.35 miles from the Project Site (half of 6.7 miles, which is the average work VMT per employee). However, the “work VMT per employee” is more than simply the calculation of the distance between the employee’s home and workplace. First, the average work VMT per employee is calculated based on the “home-based work attraction” trip types, which are one-way trips. In other words, 6.7 miles is the average *one-way* VMT. Second, the calculation of the work VMT per employee also takes into account the employee mode split (the number of employees that utilize carpool, transit, bike or walk).

As an example a sample VMT calculation is presented in Table II-3 on page II-126 to help demonstrate the relationship between employee trip length and VMT. The VMT calculation shows the employee trip distribution characteristics for a business with 10 employees. These 10 employees are spread out throughout the metropolitan region, living within 20 miles from their workplace. These employees live on average 8.7 miles away from their workplace.

When VMT is calculated from the average employee trip length, the mode of travel and the vehicle occupancy is taken into account. For example, Table II-3 shows that eight of the 10 employees get to work in an automobile (with six driving and two as passengers). One employee takes the bus to work and the employee who lives the closest to the workplace walks or takes their bike to work. The VMT is generated by the employees that drive their cars to work. The two employees that are carpool riders, the bus rider, and the bicyclist do not generate VMT because they are not driving a vehicle to work. Thus, in this example, the 10 employees live a total of 87 miles from work (at an average of 8.7 miles each), but they generate an average of only 5.9 work VMT per employee for their cumulative home-to-work morning trip.

⁵⁵ “Work VMT per employee” measures the average home-to-work one-way driving trip for the total employees of a project, but the calculation also includes factors such as carpooling, transit, walking, and biking. It is not a simple calculation of the average distance the employees live from work. See the example discussed below that helps demonstrate this calculation.

**Table II-3
Employee VMT Example**

Employee	Distance Home to Work (miles)	Travel Mode	Vehicle Miles Traveled
1	13	Drive	13
2	2	Drive	2
3	13	Car Passenger	0
4	1	Walk/Bike	0
5	8	Drive	8
6	6	Drive	6
7	4	Bus	0
8	10	Car Passenger	0
9	20	Drive	20
10	10	Drive	10
Total	87		59
Average	$87/10 = 8.7$		$59/10 = 5.9$
<hr/> <i>Source: Gibson Transportation Consulting, Inc., 2023.</i>			

In the case of the Project, as discussed in Section IV.K, Transportation, of the Draft EIR, the Project would generate an average of 6.7 work VMT per employee, which is less than the threshold of 7.6 VMT per employee for the Central APC area. The Project's VMT analysis was conservative in numerous respects, including by assuming high trip generating uses.

Further, although the Project would include an extensive TDM Program, which is discussed in Topical Response No. 11, Transportation Demand Management, the VMT analysis in the Draft EIR did not account for most of the Project's TDM measures and is therefore conservative. The additional TDM measures not accounted for in the VMT analysis, such as the shuttle to the Metro D (Purple) Line Wilshire/Fairfax Station, bike share stations (or similar), and traffic calming measures as part of the Project's transportation improvement program, would further reduce total VMT and work VMT per employee.

A supplemental VMT analysis was conducted which incorporates all TDM strategies proposed by the Project that can be evaluated as part of the built-in TDM strategies in the VMT Calculator, which is included in Appendix E of the Transportation Assessment (Appendix M.1 of the Draft EIR). As shown therein, the Project would generate an average 4.9 work VMT per employee with the proposed TDM measures. Please refer to Topical

Responses No. 11, Transportation Demand Management, and No. 10, Trip Generation, regarding the Project's TDM Program and trip generation estimates, respectively.

Empirical Data

Commenters state that various other data sources suggest that existing employment trip lengths in the vicinity are longer than those reported by the VMT Calculator. Specific citations were made to the U.S. Census Bureau's "OnTheMap" feature and data analytics firms StreetLight Data and Placer, and comments assert that empirical data from the existing studio should have been used to conduct the VMT analysis. However, this assertion is incorrect, as none of these alternative data sources are approved for VMT analysis in the City, and the use of these sources for the VMT analysis would be inconsistent with the City's adopted TAG thresholds of significance and OPR Technical Advisory, as explained below.

As stated on page 113 of the Transportation Assessment, which was approved by LADOT, the VMT Calculator determines a project's VMT based on trip length information from the City's travel demand forecasting model, consistent with the OPR Technical Advisory. Likewise, the VMT Calculator uses only employee data to calculate work trip VMT per employee in accordance with LADOT and OPR guidance, and a data sample that includes visitors and audience member trips makes any resulting calculations meaningless when compared to the work trip VMT per employee thresholds for the Central APC area. The travel demand forecasting model considers the traffic analysis zone within 0.125 mile of the Project to determine the trip lengths and trip types that factor into the calculations of the Project's VMT. None of the three data sources identified in the comments are approved sources of data for VMT analysis in the City, as LADOT utilizes the City of Los Angeles VMT Calculator or the City of Los Angeles Travel Demand Forecast model, which is based on the Southern California Association of Governments (SCAG) Travel Demand Forecast Model.

Furthermore, each alternative source identified by the commenters is based on a small, non-representative sample of traffic in the vicinity of the Project Site and extrapolated up to represent the whole campus. The data from the U.S. Census Bureau and Placer both show bands of trips that suggest that half or more of the trips are less than 10 miles, but the next band shows between 10 and 24 miles (Census) or 10 and 30 miles (Placer), which tells very little about average trip lengths because the range of the bands is too large to calculate a meaningful average. In the case of the StreetLight Data, records are noted to include not just employees but also visitors, including studio audience members, and thus are not representative of the data needed to calculate employee work trip VMT. Thus, the alternate methodologies suggested are not valid mathematically nor are they even based on comparable base data. The VMT Calculator uses only employee data to calculate work trip VMT per employee in accordance with LADOT and OPR

guidance, and a data sample that includes visitors and audience member trips makes any resulting calculations meaningless when compared to the work trip VMT per employee thresholds for the Central APC.

Importantly, there is nothing in the VMT Calculator User Guide, the TAG, or the OPR Technical Advisory recommending use of alternative VMT information to forecast future VMT for the purpose of the CEQA transportation analysis. The VMT Calculator relies on data from the City's validated travel demand forecasting model, which is also consistent with the SCAG regional travel demand forecasting model.⁵⁶ The City's analysis guidelines and the VMT Calculator are fully compliant with CEQA requirements and the recommendations from the OPR Technical Advisory.

Furthermore, consistent with the OPR Technical Advisory, the thresholds of significance established by LADOT are based on the same data used to develop the VMT Calculator (i.e., the City's travel demand forecasting model). Per the OPR Technical Advisory, in determining potential significant impacts, it is critical to make an "apples-to-apples" comparison between Project-generated VMT and the thresholds of significance. The OPR Technical Advisory states on page 5 that "[m]odels and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. For example: Where a travel demand model is used to determine thresholds, the same model should also be used to provide trip lengths as part of assessing project VMT." Similarly, the OPR Technical Advisory states on page 30 that "[w]hen using models and tools [for establishing thresholds of significance and estimating VMT reduction attributable to mitigation measures and project alternatives], agencies should use comparable data and methods, in order to set up an 'apples-to-apples' comparison between thresholds, VMT estimates, and VMT mitigation estimates." The City's threshold of significance for work VMT per employee in the Central APC area (7.6 work VMT per employee) was established as 15 percent lower than the average work VMT per employee in the Central APC area based on the same metrics as used by the VMT Calculator to determine that the Project would generate average work VMT per employee of 6.7. If an alternative data source were to be used to determine Project-related work VMT per employee, whether empirical data or one of the three sources noted in the comments, it could not be validly compared to the City's established VMT thresholds of significance. The only way a valid comparison could be made would be if that same alternative data methodology were applied to the geographic area of the entire Central APC and used by the City to establish new thresholds of significance. Rather, a key purpose of the VMT Calculator is to provide a common basis for both significance thresholds and project-related VMT analysis such that localized variations in socio-demographic and built environment factors can be used to compare project-related VMT to

⁵⁶ LADOT, Transportation Assessment Guidelines, August 2022, pp. 2-9 through 2-11.

area-wide baseline conditions. Therefore, it was both appropriate and required to use the VMT Calculator to evaluate Project VMT according to LADOT and OPR guidance.

Topical Response No. 9. Neighborhood Traffic Management Plan

This Topical Response addresses comments related to the Project's potential effect on cut-through trips, defined as vehicles that bypass a congested arterial or intersection and instead opt to travel along a residential street. Cut-through trips are not environmental impacts under CEQA (CEQA Guidelines § 15064.3, subd. (a) [except for roadway capacity projects, "a project's effect on automobile delay shall not constitute a significant environmental impact."]). However, pursuant to the TAG, a residential street cut-through evaluation is required as part of the non-CEQA transportation analysis.⁵⁷ Therefore, as a non-CEQA transportation measure, the Project is required to contribute to and implement a Neighborhood Traffic Management Plan (NTMP) to minimize potential cut-through trips on the residential streets surrounding the Project Site, as discussed in Section IV.K, Transportation, and Appendix M.1, Transportation Assessment, of the Draft EIR. The Project's residential cut-through analysis is included in Section 5C of the Transportation Assessment. However, as stated above, any cut-through effects on residential streets caused by the Project are not considered impacts pursuant to CEQA, and measures that minimize any such effects are not CEQA mitigation measures but rather circulation measures required by LADOT. Accordingly, the comments that state that the residential cut-through analysis and NTMP constitute deferred mitigation under CEQA are incorrect.

A. Deferred Mitigation

Comments claim that the Draft EIR improperly deferred mitigation of cut-through traffic, which is incorrect. Although not required under CEQA, the Project would fund the implementation of an NTMP in order to minimize potential residential cut-through trips generated by the Project in accordance with the TAG. Contrary to public comments, the discussion of the NTMP in the Draft EIR does not represent "deferred mitigation," because the potential cut-through effects on the six residential streets identified in the Transportation Assessment do not constitute impacts under CEQA and therefore no mitigation is required. Further, as described in more detail below, the analysis included in the Draft EIR and Transportation Assessment is consistent with the TAG and LADOT policies regarding the preparation of an NTMP associated with a proposed development project in the City of Los Angeles.

Section 5C of the Transportation Assessment follows the procedures outlined in the TAG to identify the local residential streets that could potentially be affected by the Project.

⁵⁷ Transportation Assessment Guidelines, Los Angeles Department of Transportation, Los Angeles, August 2022, Section 3, Chapter 3.5, pages 3-18 to 3-22.

As stated on page 1 of the Transportation Assessment, the methodology and base assumptions used in the analysis were approved by LADOT. In accordance with the TAG, the Transportation Assessment evaluated 11 residential streets in the Project's adjacent neighborhoods, directly north and west of the Project Site, which could be used as cut-through routes to avoid arterial congestion.⁵⁸ As stated on page 169 of the Transportation Assessment, a local residential street would be considered to be excessively affected by Project trips based on an increase in the projected ADT on the street as follows:

Projected ADT with Project (Final ADT)	Project-Related Increase in ADT
1 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

The Project's daily vehicle trips, shown in Table IV.K-5 of the Draft EIR, are determined using the VMT Calculator estimates, which are included as Appendix E of the Transportation Assessment. Due to the COVID-19 pandemic and resulting shelter-in-place orders throughout the State during the preparation of the Transportation Assessment, representative and meaningful existing ADT counts could not be collected because travel patterns were disrupted by the pandemic. Instead, these counts will be collected after traffic conditions return to a more typical level prior to the occupancy of any portion of the Project. These new traffic counts on the residential streets would be conducted to establish a "before Project" base condition, closer to the time of actual occupancy of the Project. In the meantime, the Transportation Assessment conservatively assumed potential Project trip increases on each street segment based on the most stringent threshold; i.e., 120 or more Project ADT, which is the threshold if the street segments carry fewer than 999 daily trips despite the fact that the street segments may carry more than 999 daily trips. Detailed estimates of the Project's potential cut-through trips were prepared for the adjacent neighborhoods and further for each of the individual street segments, as discussed on pages 169–173 of the Transportation Assessment. Based on these estimates and conservative application of threshold assumptions, the Transportation Assessment concluded that the Project could potentially add more than 120 daily trips to six residential streets. In order to minimize these potential cut-through effects, the Project would fund two neighborhood traffic management studies and contribute toward the implementation of NTMP measures for the two areas identified in Figure 26 on page 176 of Appendix M.1, the Transportation Assessment, of the Draft EIR.

⁵⁸ See Section B of this Topical Response for a discussion of the methodology and scope of the residential cut-through analysis.

The Project's NTMP would be developed pursuant to LADOT requirements and procedures in coordination with LADOT, City Council District 5 staff, and affected neighborhood residents, and would include an implementation plan that sets forth key milestones and a process for the selection and approval of NTMP measures. The Applicant would work closely with LADOT and the residents in the two areas during the development of the NTMP to identify potential adverse local street conditions (e.g., cut-through trips, speeding, stop sign violations) and evaluate the measures available to minimize these issues. LADOT has a specific process in place, described in Section 3.5.5 of the TAG, that allows the neighbors most directly affected by a project's potential cut-through effects to be directly involved in the development, evaluation, and implementation of measures to minimize these types of issues. Because the implementation of NTMP measures requires the input and approval of the neighbors, it is not possible to specifically identify the type and locations of these neighborhood measures as part of the Draft EIR process. Given the non-CEQA nature of this analysis, it is also not required for CEQA purposes during the EIR process. The procedure for developing the NTMP involves community meetings between the potentially affected residents and LADOT, during which a mutually acceptable plan would be formed. Therefore, the preparation of the NTMP for the Project would occur after the Project has received final approval from the Los Angeles City Council, consistent with established LADOT and CEQA practice.

Typical NTMP physical measures may include, but are not limited to, traffic circles, speed humps, installation of barriers, speed tables, chicanes, chokers, roadway narrowing effects (raised medians, etc.), landscaping features, roadway striping changes, and/or operational measures such as turn restrictions, speed limits, and installation of stop signs. After a trial period, the neighbors can evaluate the effectiveness of the measures and modify the measures as necessary to better address their concerns. The NTMP process would be formalized through an agreement between the Applicant and LADOT prior to the issuance of any certificates of occupancy for the Project. Grading and construction permits may be issued while the NTMP studies are in process, again consistent with LADOT policy. This is consistent with the LADOT NTMP process, as described in Section 3.5.5 of the TAG.

Thus, the NTMP measures do not represent "deferred mitigation." Rather, these measures are non-CEQA measures consistent with the policies and procedures of LADOT. The requirement to prepare an NTMP for the two areas identified in the Draft EIR, in cooperation with the potentially affected neighbors, would be incorporated as a condition of approval for the Project as outlined on pages 8 and 9 of the LADOT Assessment Letter dated November 16, 2021 (Appendix M.2 of the Draft EIR).

B. Cut-Through Effects on Adjacent Neighborhoods

Commenters stated their concerns that Project trips could result in cut through traffic added to their local residential streets. As described in the TAG and summarized in the Draft EIR Transportation Assessment, an increase in ADT volumes on a local residential street can adversely affect the character and function of those streets. The objective of the residential street segment analysis included in the TAG (Section 3, Chapter 3.5) is to determine the Project's potential to add cut-through trips to the residential streets in the vicinity of the Project Site.

In consultation with LADOT, the Transportation Assessment discusses in detail the potential for cut-through trips and identifies five Local Streets and one Collector Street that might be subject to such trips, including the following:

North Neighborhood

- Genesee Avenue
- Stanley Avenue
- Rosewood Avenue—Collector Street
- Oakwood Avenue

West Neighborhood

- Edinburgh Avenue
- West 1st Street

The purpose of the NTMP process is to address the concerns of the neighbors regarding traffic and parking effects in the neighborhoods. The three problems most often cited by neighbors are cut-through traffic, speeding cars, and parking overflow.

The NTMP process is discussed in Section A, Deferred Mitigation, above. As stated therein, the Applicant would work closely with LADOT and the residents in the two neighborhoods during the development of the NTMP to identify potential adverse local street effects and evaluate the measures available to minimize such effects. As part of ongoing outreach prior to the formal commencement of the NTMP process, the Applicant will continue to identify NTMP concepts.

Impacts on Historic Neighborhood Designation

Please refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant impact on the Beverly Fairfax Historic District.

C. Boundaries of the NTMP Areas

Commenters have suggested that the boundaries of the two NTMP areas should be expanded. Streets within these areas were identified based on the LADOT criteria for potential residential street cut-through impacts. Streets beyond the limits of the two areas identified are not expected to meet the criteria. The rationale for the selection of the areas to be studied for cut-through effects was reviewed and approved by LADOT in their November 16, 2021 Assessment Letter (Appendix M.2 of the Draft EIR).

The two residential areas located to the north and west of the Project Site that were identified in the non-CEQA portion of the Transportation Assessment (Appendix M.1 of the Draft EIR) meet the LADOT criteria for the evaluation of potential cut-through trips. The Transportation Assessment was prepared pursuant to LADOT's TAG, which establishes the guidelines and methodology for assessing transportation impacts for development projects. As discussed above in Section A, Deferred Mitigation, the evaluation of residential cut-through trips is a non-CEQA analysis required under the TAG. Regarding the criteria for evaluation, per Chapter 3.5 of the TAG, when selecting residential street segments for analyses during the Transportation Assessment scoping process, all of the following conditions must be present:

- “The project is located along a currently congested Boulevard or Avenue and adds trips that may lead to trip diversion to parallel routes along residential Local Streets. The congestion level of the Boulevard or Avenue can be determined based on the estimated peak hour LOS under project conditions of the study intersection(s). LOS E and F are considered to represent congested conditions;
- “The project is projected to add a significant amount of automobile traffic to the congested Boulevard(s), Avenue(s), or Collector(s) that could potentially cause a shift to alternative route(s); and
- “Nearby local residential street(s) (defined as Local streets as designated in the City's General Plan passing through a residential neighborhood) provide motorists with a viable alternative route. A viable alternative route is defined as one which is parallel and reasonably adjacent to the primary route as to make it

attractive as an alternative to the primary route. LADOT has discretion to define which routes are viable alternative routes, based on, but not limited to, features such as geography and presence of existing traffic control devices, etc.”⁵⁹

Vehicular access to the Project Site would be provided along the Project perimeter on Fairfax Avenue, Beverly Boulevard, and The Grove Drive, all of which are designated Avenues or Collector Streets in the City’s Mobility Plan. Additional access would also be provided along the Southern Shared Access Drive. Residential uses are located in areas to the north of Beverly Boulevard, to the east of the Project Site, and in areas to the west of Fairfax Avenue. Residential uses are also located south of the Project Site, but are generally separated by local and regional commercial, entertainment, and cultural land uses. The residential streets provide connectivity to major streets in the vicinity and provide potential alternatives to Crescent Heights Boulevard, Fairfax Avenue, La Brea Avenue, Melrose Avenue, Beverly Boulevard, and West 3rd Street.

As discussed in Section 5C of the Transportation Assessment, the residential streets in the west and north neighborhoods of the Project Site were examined for the availability of parallel local streets that could be used as a cut-through route to avoid arterial congestion.

The residential neighborhood to the northeast of the Project Site between Beverly Boulevard and Melrose Avenue was also investigated for potential cut-through effects, but the north-south residential streets east of the Project Site do not offer the same travel time savings as do the selected streets. Figure 19 on pages 69–72 of the Transportation Assessment shows the assignment of Project trips through each of the 28 study intersections analyzed in the report.⁶⁰ Of the approximately 9,733 net new daily trips⁶¹ generated by the Project, a total of 3 percent of the daily trips would be generated within the 40-block neighborhood bounded by Melrose Avenue, La Brea Avenue, Beverly Boulevard, and Curson Avenue. These approximately 292 trips ($9,733 \times 0.03 = 292$ daily trips) would be spread out among the 10 north-south residential streets serving the neighborhood, and these trips would not be considered “cut-through” trips because they

⁵⁹ LADOT, Transportation Assessment Guidelines, August 2022, page 3-19. These criteria are identical to those included in the previous version of the TAG dated July 2020, which is the TAG version used in the preparation of the Transportation Assessment for the Project.

⁶⁰ Figure 19 specifies trip distribution for the studio-related uses (i.e., all except retail uses). For the purposes of this supplemental neighborhood analysis, the studio-related distribution from Figure 19 was assumed to apply to trips generated by all land uses. This is a conservative assumption, as the retail trips are assumed to be local-serving, with shorter trip lengths that are less likely to cut through neighborhoods.

⁶¹ As used in Section 5C and shown in Table 13 of the Transportation Assessment. This includes both studio-related and retail trips.

would have originated within the neighborhood itself. A cut-through trip through the northeast neighborhood would have to be a diversion from the La Brea Avenue corridor. Figure 19 shows that 10 percent of the trips are assigned through the La Brea Avenue corridor north of Beverly Boulevard. The La Brea Avenue corridor north of Beverly Boulevard would handle approximately 973 net new Project trips per day, and with 10 north-south local residential streets west of La Brea Avenue, more than half of the La Brea Avenue trips would have to cut through the neighborhood for multiple local streets to reach the cut-through traffic threshold, which is highly unlikely. After intersection and traffic signal system improvements in the Beverly Boulevard corridor, Table 18 on pages 162 and 163 of the Transportation Assessment shows that the Future with Project performance of the Beverly Boulevard corridor would be at LOS B and C. This performance level would not provide the travel time savings to make a diversion through the neighborhood worthwhile. Thus, diversion through the northeast neighborhood is not expected to occur at the levels that would meet City thresholds.

The neighborhood to the east of the Project Site is separated from the Project Site by Pan Pacific Park. Approximately 20 percent of the Project trips would travel to and from the Project Site via 3rd Street. However, Table 18 shows that Future with Project performance levels along 3rd Street are generally LOS A–C, so there is very little reason to cut through the neighborhood between 3rd Street and Beverly Boulevard when a faster trip could be completed via 3rd Street and The Grove Drive.

The potential for cut-through effects south of the Project Site is minimal because the private residential streets within Park La Brea are gated, only allowing residents and approved guests in or through.

Thus, in accordance with the TAG, a total of 11 residential street segments in the north and west neighborhoods were selected for detailed analysis. These street segments are shown in Figure 26 on page 176 of the Transportation Assessment and include all nearby residential street segments classified as Local Streets (and one Collector Street) where Project trips could travel because it provides a viable alternative to a major street. Other residential streets may carry sporadic Project trips, but not in great enough volume to potentially meet City thresholds for excessive effects.

The trip estimates for the residential streets that met the TAG criteria are included in Tables 21 and 22 on pages 177 and 178 of the Transportation Assessment. The Transportation Assessment acknowledges that the existing, pre-Project traffic conditions along both Beverly Boulevard and Fairfax Avenue adjacent to the Project Site are congested, and the Project would add trips to these corridors. In accordance with the TAG, the Transportation Assessment identified certain streets within the adjacent residential neighborhoods that might serve as alternative routes to these two arterial streets. Therefore, the Applicant would be required to fund and coordinate the implementation of an

NTMP for the two areas identified in the Transportation Assessment. Consistent with LADOT and the City's practice, the NTMP would be developed after Project approval and with the coordination and participation of the affected neighbors, as described in LADOT's Assessment Letter dated November 16, 2021.

Topical Response No. 10. Trip Generation

A. Empirical Data

Commenters suggested that the use of empirical trip generation data developed at a different studio campus in Los Angeles should not have been applied to the Project, and that the Transportation Assessment undercounts Project trip generation. However, the use of the rates in question as the basis of the analysis in the Draft EIR was valid and consistent with LADOT and CEQA policy and precedent. As described throughout the Draft EIR, the Project consists of five land uses, each with distinct trip-generating characteristics: sound stages, production support, production office, general office and retail. As discussed in Section IV.K, Transportation, and the Transportation Assessment, included as Appendix M.1, of the Draft EIR, the trip generation rates for sound stages, production support, and production office were based on empirical studies of trip generation at other existing and approved modern studios in Los Angeles, because standard publications, such as the Institute of Transportation Engineers Trip Generation Manual, do not provide data for studio-related uses. These rates are found in the *Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report* (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) and have been used in a variety of more recent analyses for production studios in Los Angeles, including the *Transportation Study for the Paramount Pictures Master Plan* (Gibson Transportation Consulting, 2015). These reports were prepared by Gibson Transportation Consulting, a traffic engineering firm in Los Angeles with substantial experience evaluating the trip profile of studio properties, who also prepared the Transportation Assessment for the Project. The trip generation rates were also evaluated and approved for use in the Draft EIR by LADOT as part of the MOU process as documented in Appendix A of the Transportation Assessment (Appendix M.1 of the Draft EIR).

Project trip generation estimates for the general office and retail land uses were prepared using rates from the *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, 2017) per LADOT guidelines, while locally developed rates were used for the sound stages, production support, and production office land uses. The 10th Edition of the Trip Generation Manual was the latest approved version in use when the Draft EIR was published. It should be emphasized that the trip generation rates derived from empirical data collected at the other Southern California studio sites or the trip generation rates included in the Institute of Transportation Engineers *Trip Generation Manual, 10th Edition* both include all vehicular movements to/from the subject sites or land uses. The trip generation rates include the total movements generated by automobiles, vans, large trucks, and small trucks. The Project trip generation estimates summarized in Tables 6 and 7 on pages 81 and 82 of the Transportation Assessment (Appendix M.1 of the Draft EIR) therefore include the total vehicular trips of all types of vehicles. The use of empirically developed rates from another studio is fully consistent with the TAG and CEQA.

The TAG states, “[u]nique types of development may require trip generation studies of similar facilities in order to establish a trip rate for use in the analysis. These developments may include land uses for which trip generation rates are not available in the ITE Trip Generation manual,” referring to the latest approved version of the *Trip Generation Manual* by the Institute of Transportation Engineers.⁶²

The trip generation rates used for the proposed studio uses were established in 2009 as part of the NBC Universal Vision Plan Project Trip Generation Model (NBCU Trip Model) and have been used in a variety of more recent analyses for production studios in Los Angeles. Trip counts were conducted at all the driveways serving the NBC Universal site and the volumes were compared to the square footage totals of the various studio land uses on the site. By comparing the total volume of vehicles using each driveway to the land use types and amounts of development served by each driveway, a trip rate by land use was developed. The driveway volumes and trip rates were independently verified by LADOT who conducted their own driveway trip counts.

NBC Universal is a larger studio than Television City currently, with over 1,600,000 square feet of studio-related uses at the time the rates were developed, as compared to less than 600,000 square feet of existing studio-related uses at the Project Site. As such, the rates developed at NBC Universal were based on much larger samples and are therefore more statistically valid. NBC Universal had similar features to the Project Site (both the existing studio and as proposed with the Project), including sound stages (including studio audience participation, which is discussed in detail below), production support, production office, and general office. The NBCU Trip Model developed rates for peak hour and daily trips for sound stages, production support, and production office uses and recommended the use of the Trip Generation Manual for general office uses. These rates were reviewed and approved by LADOT for use in traffic studies and environmental analyses for NBC Universal,⁶³ Paramount Pictures,⁶⁴ Sunset Gower Studios,⁶⁵ and other studios.

⁶² The Transportation Assessment used the 10th Edition of Trip Generation Manual published in 2017. The 11th Edition was published in September 2021, less than one month prior to the final draft of the Transportation Assessment, and long after the analysis results were finalized. Nonetheless, the trip generation rates for general office in the 11th Edition are lower than those in the 10th Edition, so the use of the older rates results in higher Project trip generation estimates and a more conservative analysis.

⁶³ Gibson Transportation Consulting and Raju Associates, Transportation Study for the NBC Universal Evolution Plan EIR, March 2010.

⁶⁴ Gibson Transportation Consulting, Transportation Study for the Paramount Pictures Master Plan, August 2015.

⁶⁵ Gibson Transportation Consulting, Transportation Impact Study for Sunset Gower Studios Preservation and Enhancement Plan, October 2018.

The applicability of the NBCU Trip Model rates to the Project was tested by applying the rates to the existing on-site land uses within the Project and comparing those results to empirical driveway counts collected at the Project Site driveways over multiple days. For informational purposes and to address comments on the Draft EIR, Table II-4 beginning on page II-141 summarizes the trips counted at the Project Site driveways (surveyed over three weekdays in September 2019, prior to the COVID-19 pandemic, and provided in Appendix FEIR-5, TVC Driveway Counts) compared with the estimates of trip generation from existing uses using the established NBCU Trip Model rates described above. As shown in Table II-4, the total daily trip estimate using the established NBCU Trip Model rates exceeds the three-day average driveway trip generation for the Project Site by nearly 11 percent. The afternoon peak-hour estimate using the established NBCU Trip Model rates exceeds the three-day average driveway trip generation for the Project Site by nearly 20 percent. (The inbound trip estimate substantially exceeds the three-day average trip generation, showing that the NBCU Trip Model assumed more late afternoon arrivals—such as for studio audience visits—than actually occur at the Project Site.) The morning peak-hour estimate using the established NBCU Trip Model rates is lower than the three-day average driveway trip generation for the Project Site by less than 10 percent. Therefore, the NBCU Model predicts higher Project trips for five of the seven directional traffic flow patterns tested. Of the two directional flows where the model underestimates the actual traffic volumes, much of the difference could be attributed to the transit/walk-in adjustments taken for the existing land uses. Without the adjustments applied to these two land uses, the model predictions and the actual driveway counts would be within approximately 4.8 percent for the morning inbound and an exact match for the afternoon outbound flow. While the transit/walk-in adjustments are appropriate for future conditions with the Project when the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction is open and in light of the Project's TDM Program that would include shuttles buses connecting the Project Site to the station, this adjustment may overstate the effectiveness of transit for the existing site. Thus, the NBCU Trip Model rates are indeed appropriate, if not conservatively high, for use in the estimation of future Project trips. Therefore, the studio trip generation rates from the NBCU Trip Model were approved by LADOT for use in the Project's Transportation Assessment.

However, even if the trip generation rates were adjusted to exactly align with the driveway counts, this would not affect any of the impact conclusions presented in the Draft EIR. Five environmental impact areas depend to some degree on trip generation estimates:

- The transportation analysis presented in Section IV.K is based on VMT, the analysis of which is based solely on the conservative daily trip generation estimates using the NBCU Trip Model rates.
- The air quality analysis presented in Section IV.A is based on the conservative daily trip generation estimates using the NBCU Trip Model rates.

Table II-4
Project Trip Generation Rates Compared to Driveway Counts

Land Use	ITE Land Use	Rate or Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Estimates Based on Established Rates ^a									
Trip Generation Rates									
Sound Stage	b	per 1,000 sf	5.91	63%	37%	0.20	40%	60%	0.43
Production Support	b	per 1,000 sf	4.14	65%	35%	0.61	45%	55%	0.57
Production Office	b	per 1,000 sf	9.34	62%	38%	0.66	45%	55%	0.63
General Office ^c	710	per 1,000 sf	10.46	86%	14%	1.11	16%	84%	1.12
Trip Generation Estimates									
Sound Stage	b	95,540 sf	565	12	7	19	16	25	41
Transit/Walk-In Adjustment—15%			(85)	(2)	(1)	(3)	(2)	(4)	(6)
Production Support	b	325,450 sf	1,347	129	70	199	84	102	186
Transit/Walk-In Adjustment—15%			(202)	(19)	(11)	(30)	(13)	(15)	(28)
Production Office	b	163,090 sf	1,523	67	41	108	46	57	103
Transit/Walk-In Adjustment—15%			(228)	(10)	(6)	(16)	(7)	(9)	(16)
General Office	710	159,600 sf	1,670	152	25	177	28	150	178
Transit/Walk-In Adjustment—15%			(251)	(23)	(4)	(27)	(4)	(23)	(27)
Total Estimate		743,680 gsf	4,339	306	121	427	148	283	431
Trip Generation Based on Driveway Counts									
Driveway Counts ^d									
Tuesday, September 10, 2019			4,031	397	135	532	41	292	333
Wednesday, September 11, 2019			3,896	353	99	452	47	394	441
Thursday, September 12, 2019			3,822	318	115	433	48	258	306
3-Day Average			3,916	356	116	472	45	315	360
Difference Between Established Studio Rates and Driveway Counts			10.8%	-14.0%	4.3%	-9.5%	228.9%	-10.2%	19.7%

Table II-4 (Continued)
Project Trip Generation Rates Compared to Driveway Counts

Land Use	ITE Land Use	Rate or Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
<hr/> <p><i>sf = square feet</i></p> <p>^a This information is also found in the Transportation Assessment, Tables 6 and 9.</p> <p>^b Trip generation rates for sound stages, production support, and production office uses are based on empirical data from other studios in Los Angeles and have been used to estimate studio-related trips for several transportation impact studies, including NBC Universal Evolution Plan Alternative 10 Transportation Analysis (Gibson Transportation Consulting, 2012) and Transportation Study for the Paramount Pictures Master Plan (Gibson Transportation Consulting, 2015).</p> <p>^c Trip generation rates for general office based on the best-fit curve formulas listed in Trip Generation Manual, 10th Edition (Institute of Transportation Engineers, 2017), applied to 594,070 sf of gross new general office space proposed by the Project:</p> <p>Weekday Morning Peak Hour: $T = 0.94(X) + 26.49$</p> <p>Weekday Afternoon Peak Hour: $\ln(T) = 0.95 \ln(X) + 0.36$</p> <p>$T$ = Average Vehicle Trips</p> <p>X = 594.07 Gross Leasable Area (1,000 sf)</p> <p>These best-fit curve equations yield 10.46 daily trips per 1,000 sf for 159,600 sf of existing general office and 10.06 daily trips per 1,000 sf for 700,000 sf of general office space in the total Project.</p> <p>^d Counts conducted at the Beverly Boulevard and Fairfax Avenue gates over three consecutive 24-hour periods. Morning and afternoon peak-hour values represent the highest combined (i.e., inbound + outbound) trips counted between 7 A.M. and 10 A.M. and between 3 P.M. and 6 P.M. Original count sheets are provided in Appendix FEIR-5, Driveway Counts..</p> <p>Source: Gibson Transportation Consulting, Inc., 2023.</p>									

- The energy analysis presented in Section IV.C is based on the conservative daily trip generation estimates using the NBCU Trip Model rates.
- The GHG emissions analysis presented in Section IV.E is based on the conservative daily trip generation estimates using the NBCU Trip Model rates.
- The noise analysis presented in Section IV.I accounts for peak-hour trip generation estimates using the NBCU Trip Model rates.

Four of the five environmental impact areas above only use daily trip generation estimates for the CEQA analysis, and, as shown in Table II-4 beginning on page II-141, the NBCU Trip Model rates estimated higher daily trips than were actually counted at the Project Site driveways. As discussed above, the Draft EIR calculated Project trips based on the NBCU Trip Model rates and, therefore, the analyses that used the daily trip estimate are conservative. The noise analysis used an average of morning and afternoon peak-hour trip generation to estimate the daily trips at analyzed roadway intersections to evaluate off-site vehicle noise. If the morning peak-hour trip generation estimate were to be increased by 9.5 percent (the difference of 45 A.M. peak-hour trips shown in Table II-4), it would increase the total estimate of off-site vehicle trips by approximately 5 percent (due to averaging the morning and afternoon peak-hour trip generation estimates). The noise increase due to the 5-percent increase in off-site vehicle trip generation would be approximately 0.2 dBA. However, the overall noise levels increase at the off-site roadway segments would be less than 0.1 dBA, when taking into account the existing vehicle trips. Based on the results of the noise impact analyses in Table IV.I-16 through Table IV.I-18 in Section IV.I, Noise, of the Draft EIR, the maximum noise increase due to Project traffic would be 1.0 dBA CNEL (along The Grove Drive). As such, the estimated slight increase in vehicle trips (5-percent increase) would result in a maximum noise level increase of 1.1 dBA CNEL (along The Grove Drive), which would not change the findings of no significant impacts due to roadway traffic noise (Table IV.I-16 and Table IV.I-17) or composite noise (Table IV.I-18).

Similar to other studio campuses, the Project Site hosts production-related events on a regular basis. Small events hosted by productions utilizing the studio space may include meet-and-greets and other small-scale events that occur in the normal course of a studio production. They are typically hosted within the stages used by a given production, often on weekday evenings. There are also infrequent larger production-related events, such as production finale parties, production-related experiences, and studio dedications. Historically, these larger events have hosted up to approximately 300 attendees and have occurred approximately five times per year at the Project Site, typically on nights or weekends.

These production-related events are not separately accounted for in the trip generation estimates because they occur regularly (i.e., they are considered to be inherent

in the NBCU Trip Model). Nonetheless, these events are typically held outside of the peak time periods for the Project Site (i.e., they are typically held on nights and weekends) and thus would not affect peak-hour traffic conditions on the adjacent streets. Parking for these events can be accommodated within the Project Site. These events also do not affect the VMT analysis in the Draft EIR because the VMT analysis focuses on home-to-work employee trips. Trips from infrequent larger production-related events are not relevant for purposes of the CEQA VMT analysis because these trips are not home-based work attraction trips and would not affect the daily work VMT per employee calculation that is used to determine the Project's VMT impact.

B. Visitor Trips

Contrary to the claims made by commenters, visitor trips, including those from studio audience visitors, were accounted for in the Project trip generation and VMT estimates. As described above, the trip generation estimates were based on the rates from the NBCU Trip Model, which has been approved by LADOT for use in several traffic studies in recent years for studio projects in Los Angeles. These rates are based on empirical data collected at NBC Universal Studios and account for all of the operations that occur at a typical studio campus, including studio employee trips, third-party production employee trips, all production-related and production support vehicles including trucks, and both office visitor trips and studio audience visitor trips. NBC Universal, like the existing Project Site, operates studios that have audience members, and audience participation trips were explicitly incorporated into the NBCU Trip Model (it included daily and afternoon peak-hour trips).⁶⁶

Unless otherwise specified, references to trip generation and travel mode throughout the Draft EIR referred to employee and visitor trips, which were presented together (see, for example, page IV.K-35 of the Draft EIR). The information presented below adds detail to the visitor and audience information presented in the Draft EIR in response to comments requesting such information. The level of detail presented below is typically not included in a transportation assessment report even though the visitor trips themselves are included in the detailed CEQA analyses of the Project's air quality, noise, and transportation operational impacts. Therefore, there is no new information presented herein that would affect the conclusions and results presented in the Draft EIR.

The comments express concerns about the numbers of daily visitors, and many of these comments incorrectly state that there would be over 5,000 visitors and audience members per day with the Project. However, the actual number of visitors and audience

⁶⁶ Gibson Transportation Consulting and Raju Associates, Transportation Study for the NBC Universal Evolution Plan EIR, March 2010, Appendix I—Project Trip Generation, Page I-2 and Table A-5.

members under the Project would be far less; based on empirical data and historic trends collected by the studio, the number of daily trips associated with studio audiences and other visitors would be a small fraction of the Project's total trips, as discussed below.

Currently, there are six shows filmed at the Project Site that use studio audiences. These shows are summarized in Table II-5 on page II-146, including the pre-COVID attendance numbers and schedules.⁶⁷ As shown in Table II-5, these shows range from approximately 100 audience members to approximately 450 audience members per taping. There is an inverse correlation between the size of the audience and the number of times a particular show is filmed per year—the three shows with 300 or more audience members only film eight to 10 times per year. The three shows with 150 or fewer audience members film a combined total of approximately 424 times per year (including 28 full-audience rehearsal days and 28 live tapings for *Real Time*).

The existing shows tape during different times of the day and the taping generally occurs between noon and 7 P.M. These shows tape on varying days of the week, though only one show tapes on the weekend and that show only tapes eight times per year. These shows may also film during different times of the year, as every show is different and has its own unique needs. Spring and fall tend to be the most active time for the taping of audience shows.

As shown in Table II-5, over an entire year, there are a total of approximately 59,100 audience visitors, including approximately 55,500 on weekdays and approximately 3,600 on weekends. Table II-6 on page II-147 summarizes the average audience totals by time of day and weekend vs. weekday. As shown therein, there are approximately 161 audience members on average at the Project Site on typical weekdays during the day, bringing approximately 73 vehicles to and from the Project Site (assuming an industry-wide average of 2.2 visitors per vehicle)⁶⁸ on approximately 260 days of the year.⁶⁹ There are an average of approximately 149 audience members on approximately 92 weekday evenings per year bringing in an additional approximately 68 vehicles on those days. On eight weekend evenings per year there are approximately 450 audience members bringing

⁶⁷ Current audience levels in 2023 on the *Late Late Show*, *Real Time*, and *The Price is Right* are approximately 40 percent lower than the pre-COVID levels.

⁶⁸ Vehicle occupancy counts at event centers and entertainment venues across Southern California consistently show average occupancy levels between two and three persons per vehicle. Similarly, the vast majority of studio audience members arrive in groups of two or more people, including many groups of four traveling together. Therefore, an average vehicle occupancy of 2.2 was conservatively assumed for the conversion of audience participants into vehicle trips and parking demand.

⁶⁹ There are approximately 260 weekdays in a year. On many of those days multiple shows with studio audiences would be filmed, and on some days none would be filmed.

**Table II-5
Existing Audience Participation Shows**

Show Name	Maximum Audience per Show	Shows per Year	Days Filmed	Times Filmed	Total Maximum Annual Audience Members
<i>Late Late Show</i>	125	152	M–Th	Afternoon	19,000
<i>Real Time^a</i>	150	56	Th–F	Afternoon	8,400
<i>The Price is Right</i>	100	216	M–W	Morning, Afternoon, Evening	21,600
<i>Dancing with the Stars</i>	350	10	M	Evening	3,500
<i>So You Think You Can Dance</i>	300	10	Th	Evening	3,000
<i>American Idol</i>	450	8	Su	Evening	3,600
Total					59,100
<p><i>Data represents audience levels in 2019 prior to the COVID-19 pandemic.</i></p> <p><i>^a The 56 annual shows represents 28 rehearsals and 28 live tapings. The rehearsals occurred on Thursdays and the live filming occurred on Fridays, both with full audiences.</i></p> <p><i>Source: Interview with Michael Klausman, President, Television City.</i></p>					

approximately 205 vehicles. There are no audience members on the Project Site during the weekend days. The vast majority of audience trips occur outside of the morning and afternoon peak hours due to the times of day these audience shows are recorded and the typical requirement for audience members to arrive very early (thus, even evening recordings have arrival times earlier than the afternoon peak hour and typically have departure times later than the afternoon peak hour).

While studio audience shows have been an important part of the existing studio operations for many years, the shows summarized in Table II-5 only use approximately half of the existing stage space at the Project Site, and much of that space is only used for such shows for a portion of the year.

The Project would include the development of new sound stages, and, therefore, the number of studio audience shows is expected to increase as compared to existing conditions. Assuming the maximum permitted sound stage floor area (450,000 square feet) is constructed, it is estimated that the amount of studio audience shows within the Project Site would approximately double from current levels.⁷⁰ As such, and as shown in

⁷⁰ Estimate provided by the Applicant and its affiliate MBS, Inc., the largest operator of studios in the nation and in the world. Television City has been known throughout its history for live broadcast television, so (Footnote continued on next page)

**Table II-6
Existing Daily Average Audience Totals**

Time Period	Maximum Total Audience per Year	Approximate Filming Days per Year	Maximum Average Audience per Filming Day	Maximum Average Audience Vehicles^a
Weekday Daytime ^b	41,800	260	161	73
Weekday Evening ^c	13,700	92	149	68
Weekend Daytime	0	0	0	0
Weekend Evening ^d	3,600	8	450	205
<p><i>Based on data from Table II-5 on page II-146.</i></p> <p>^a Audience members visit in groups of two or more, almost exclusively. A conservative average vehicle ridership of 2.2 was used to convert audience members into vehicle totals.</p> <p>^b Includes the <i>Late Late Show</i>, <i>Real Time</i>, and two of three daily filmings of <i>The Price is Right</i>.</p> <p>^c Includes one of three daily filmings of <i>The Price is Right</i>, <i>Dancing with the Stars</i>, and <i>So You Think You Can Dance</i>.</p> <p>^d <i>American Idol</i>.</p> <p>Source: Interview with Michael Klausman, President, Television City.</p>				

Table II-7 on page II-148, there would be a weekday daytime average of approximately 427 audience members and 194 vehicles (388 total daily trips) associated with studio audiences with the Project. The busiest day would be a weekday that served all audience shows with daytime taping (i.e., *The Late Late Show*, *Real Time*, and *The Price is Right*). Therefore, the assertion that the Project would attract over 5,000 daily visitors/audience members is not supported by any of the current activity levels or the future plans for the Project Site. The CEQA analysis in the Draft EIR is based on work VMT per employee and audience trips (as minor peripheral and intermittent trips) do not typically enter into the CEQA VMT analysis for employment centers, just as office visitors for business purposes (another type of minor peripheral and intermittent trip) are not separately analyzed. However, as noted above, the NBCU Trip Model directly accounted for the trips associated with studio audiences and was used to calculate the daily Project trip generation used as a custom land use input to the VMT Calculator.

audience shows covet the opportunity to shoot at Television City. However, the proposed sound stages would be modern sound stages dimensioned for a range of production types including single-camera shows and feature films. The estimate of audience activity doubling is based on the increase in total sound stage square footage and the history of live television and other production types at Television City.

**Table II-7
Audience Visitor Trips**

Existing	
Existing Annual Weekday Audience Members <i>All weekday attendance from Table II-5 on page II-146.</i>	55,500
Existing Weekday Average Daily Audience Members <i>Annual weekday total/260 weekdays per year</i>	213
Existing Average Audience Vehicles <i>Weekday average audience members/2.2 people per vehicle^a</i>	97
Existing Average Daily Vehicle Trips <i>Each vehicle makes two trips (one arriving, one departing)</i>	194
Future with Project	
Future Annual Weekday Audience Members <i>Assumes twice as much audience activity as existing condition</i>	111,000
Future Weekday Average Daily Audience Members <i>Annual weekday total/260 weekdays per year</i>	427
Future Average Audience Vehicles with Project <i>Weekday average audience members/2.2 people per vehicle^a</i>	194
Future Average Daily Vehicle Trips with Project <i>Each vehicle makes two trips (one arriving, one departing)</i>	388
^a Audience members visit in groups of two or more, almost exclusively. A conservative average vehicle ridership of 2.2 was used to convert audience members into vehicle totals. Source: Gibson Transportation Consulting, Inc., 2023.	

Similarly, the NBCU Trip Model incorporated audience trips into the afternoon peak-hour rates which were used in the non-CEQA operational analysis. Very few audience trips occur during the peak commute hours, and they add little to the congestion in the area.

C. Special Events

Commenters claim that special events were not accounted for in the trip generation estimates. However, regular production-related events were accounted for in the trip generation estimates, as discussed above. Further, non-regular special events would continue to occur as they do under existing conditions. These events would continue to be governed by the LAMC and existing applicable regulations, and thus these events do not need to be analyzed in the EIR.⁷¹ Historically, the Project Site has hosted approximately

⁷¹ See CEQA Guidelines Section 15125, which states that the existing environmental setting “will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

three non-production-related special events per year with up to 5,000 attendees. These events typically occur on nights or weekends when studio-related activity is minimal.⁷² They are often charity-related and require special event permits that generally require approval from the Los Angeles Department of Building and Safety, Department of City Planning, Bureau of Street Services, Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD). These events are evaluated on a case-by-case basis consistent with existing applicable City policies and requirements by the various City departments, and the proposed Specific Plan would not provide the Project with additional authority related to special events in any way, nor does it propose any change in regulations with regard to special events. Because there would be no change compared to existing conditions, no additional analysis is required as part of this EIR.

D. Basecamp Trips

Commenters claim that trip generation for production basecamp space was not accounted for in the trip generation estimates for the Project. However, production basecamp space is ancillary to the sound stages and is common to all studio uses. A production basecamp is an inherent component of the studio campus and studios in general. As stated on page II-7 in Section II, Project Description, of the Draft EIR, production activities occur both indoors and outdoors within the Project Site and include basecamp areas where mobile facilities such as trucks and support vehicles related to production are temporarily staged. Many of the production vehicles using basecamp space do not arrive and depart on a daily basis, but are parked for the duration of a production, often weeks or months. As is typical of studio environments, the land uses are centered around production operations, including associated parking, loading, storage and related basecamp activities. Basecamps are defined areas at, near, or within a filming location where production activities can be coordinated. These basecamp areas include, but are not limited to, loading, wardrobe, hair, makeup, craft service, parking, storage of mobile facilities, and support vehicles all related to production activities. All of these basecamp activities support production and are necessary for a studio to function. The amount of basecamp space is proportional to the amount of stage space and is intended to allow for efficient production operations and internal circulation. Importantly, basecamp activities do not generate any external vehicular trips or impacts themselves; rather, the primary studio uses encompass all related production activities that occur within the basecamp areas. In the same manner, a parking structure serving an office building does not generate its own trips, but rather serves the trips generated by the office building itself. The trips in/out of the parking garage are included in the trip generation rate for the office building and the parking garage is simply an ancillary use to the office building. The same relationship occurs between the basecamp areas and the sound stages/production support space. In

⁷² Interview with Michael Klausman, President, Television City.

other words, the basecamp trips were included in the trips associated with the sound stages and production support space. The independent variable in calculating the number of trips in all studio transportation analyses has been the square footage of sound stage and production support space and not the amount of basecamp space. Trip counts conducted at other studio campuses all included the trips in/out of the basecamp areas within the various studio campuses studied.

Therefore, the trips associated with the basecamp space are already included in the trip generation rates and estimates for the sound stage and production support uses included in Section IV.K, Transportation, of the Draft EIR.

E. Truck Trips

There were several comments claiming that truck trips were not included in the trip generation estimates and questions about how many truck trips the Project would generate. Truck trip estimates were based on counts of existing truck activity collected at the Project Site over three days in 2019, as provided in the Truck Trips Memorandum included as Appendix FEIR-6. These counts were collected along with the counts included in Appendix B of the Transportation Assessment (Appendix M.1 of the Draft EIR). Although these counts were not separately included as an appendix in the Draft EIR, they were used in the Draft EIR to confirm that the NBCU Trip Model produced trip generation estimates that are consistent with existing vehicle counts at the Television City driveways and to evaluate truck activity. The counts identified “heavy” and “light” trucks, with the distinction that heavy trucks had a trailer while light trucks were fixed-frame or “single-unit.” The information presented below adds detail to the truck information presented in the Draft EIR in response to comments requesting such information. The level of detail presented below is typically not included in a CEQA transportation assessment even though the truck trips themselves are included in the comprehensive CEQA analyses of the Project’s air quality, noise, and transportation operational impacts. Information about the truck trip generation estimates may be found in Appendix FEIR-6.

Currently, most trucks access the Project Site via the driveway on Beverly Boulevard at Genesee Avenue. The largest trucks, which only arrive and depart on an infrequent basis (weekly or less), use the driveway on Fairfax Avenue at the southwest corner of the Project Site. With the Project, trucks would have the ability to enter the Project Site from Fairfax Avenue, Beverly Boulevard, and The Grove Drive, and internally traverse the Project Site to get to a specific location.

The existing site counts are summarized in Table II-8 on page II-151 and provided in Appendix FEIR-6. As shown therein, there were between 55 and 80 light truck trips per day, for an average of 65 trips per day representing approximately 33 trucks. There was an average of 13 heavy truck trips per day representing approximately seven trucks.

**Table II-8
Existing Daily Truck Trips at Project Site**

Day	Heavy Trucks	Light Trucks	Light Truck Split	
			5-Ton	10-Ton
Day 1 (September 10, 2019)	11	55	18	37
Day 2 (September 11, 2019)	16	60	20	40
Day 3 (September 12, 2019)	12	80	27	53
Average	13	65	22	43
<i>Truck trips shown are the sum of inbound and outbound trips. Source: Gibson Transportation, Inc., 2023.</i>				

Based on supplemental data provided by MBS, Inc.,⁷³ approximately one third of light trucks for studio uses tend to be five-ton trucks and the remaining two thirds are 10-ton trucks, so Table II-8 further breaks down the light truck trip totals using those proportions.

The Project increases the size of the on-site development envelope and also increases the proportion of office space within the resulting land use mix. Therefore, the existing truck trips were used as a basis to estimate Project truck trips. The existing and proposed land use mix are summarized in Table II-9 on page II-152.

Based on the increases in total on-site development, the light truck activity at the Project Site is estimated to approximately double with completion of the Project, while heavy truck activity would approximately triple. The resulting truck trip estimates with full buildout of the Project are shown in Table II-10 on page II-152. The total number of trucks generated by the Project was included in the analysis in the Draft EIR, but the additional detail in terms of the breakdown of trucks by size as shown in Table II-10 is included herein in response to specific comments from the public on the Draft EIR.

The truck trip forecasts are daily forecasts. Based on the existing counts from September 2019, truck trips occur as early as 4:00 A.M. and as late as 9:00 P.M., with the highest concentration between approximately 8:00 A.M. and 2:00 P.M. As a result, truck trips are dispersed throughout the day and do not tend to concentrate in any particular hour.

⁷³ MBS, Inc., an affiliate of the Applicant, is the largest operator of sound stage and studio campuses in the nation and in the world. MBS, Inc. provided the breakdown of truck types and sizes of trucks servicing studio campuses. The heavy truck totals for TVC were based on actual counts at the Project driveways, and the MBS data was used to split the light truck driveway counts into 5-ton and 10-ton truck categories.

**Table II-9
Existing and Proposed Land Use Mix**

Land Use Mix	Existing		Project	
	Total (sf)	Percent	Total (sf)	Percent
Sound Stage	95,540	13%	350,000	19%
Production Support	325,450	44%	104,000	6%
Production Office	163,090	22%	700,000	37%
General Office	159,600	21%	700,000	37%
Retail	0	0%	20,000	1%
Total	743,680		1,874,000	
_____ <i>sf = square feet</i> <i>Source: Gibson Transportation, Inc., 2023.</i>				

**Table II-10
Existing and Project Daily Truck Trip* Estimates**

Scenario	Heavy Trucks	5-Ton	10-Ton	Total
Existing	13	22	43	78
Existing plus Project	36	44	86	166
Net New	23	22	43	88
_____ <i>*Truck trips shown are the sum of inbound and outbound trips.</i> <i>Source: Gibson Transportation, Inc., 2023.</i>				

In summary, the gross trip generation upon completion of the Project would be approximately 13,454 trips per day (see Table 13 of the Transportation Assessment [Appendix M.1 of the Draft EIR]) of which approximately 166 daily trips would be truck trips (Table II-10). These truck trips make up approximately 1.2 percent of the total Project Site daily trip generation and are already included in the Project trip generation levels studied in the Draft EIR.

Topical Response No. 11. Transportation Demand Management

Commenters expressed concern that the Project's transportation analysis took too much trip-reduction credit resulting from the application of TDM techniques and that transit ridership estimates were unrealistically high. The TDM trip reductions were applied in two instances:

1. Daily Trips. The City of Los Angeles' VMT Calculator estimates the level of trip reduction that is likely for each project proposed in the City. The VMT Calculator uses the land use mix of the proposed project, its location within the region, and the level of transit existing and proposed in the vicinity of the site to determine the appropriate level of trip reduction for each project. The VMT Calculator is equally applied to every project in the City of Los Angeles and the trip-reducing characteristics of individual projects are calculated within the model and are not subject to outside adjustments.
2. Peak Hour. The peak-hour traffic analyses used in the non-CEQA operational analysis of potential Project traffic impacts utilized a 15-percent transit/walk-in trip adjustment, consistent with LADOT policy on TDM reductions.

Comments suggested that a high estimate of transit ridership was assumed in order to make the Project's transportation impacts look smaller. That is not the case. Both the daily and the peak-hour trip estimates assumed a similar 15-percent adjustment, which is the level approved by LADOT for a major project in a comparable location in the City.⁷⁴

A more extensive TDM Program was outlined in the Transportation Assessment (Appendix M.1 of the Draft EIR on pages 114 to 118) but the effects of this more extensive program were conservatively not applied to the Project trip levels analyzed in the Draft EIR. Thus, while the more extensive TDM Program is a Project requirement, as outlined on pages 4 to 6 of the LADOT Assessment Letter (Appendix M.2 of the Draft EIR), no trip reductions resulting from the full TDM Program were applied to the Project trip levels evaluated in the Draft EIR.

The technical analyses covering air quality, GHG, noise, and energy appropriately include the 15-percent adjustment or the VMT Calculator trip reduction depending on whether these analyses used daily or peak-hour traffic levels.

⁷⁴ Los Angeles Department of Transportation, Transportation Assessment Guidelines, August 2022, page 3-11.

A. TDM Effects on Trip Generation

Commenters have questioned the validity of the assumption in the Transportation Assessment, which is included in Appendix M.1 of the Draft EIR, that 15 percent of trips to and from the Project Site would be made by public transit and/or walk-in trips. However, the trip generation estimates in the Draft EIR, including the 15-percent transit/walk-in adjustment, were approved by LADOT and comply with the TAG and CEQA.

The TAG identifies the transit and walk-in adjustment based on trip generation studies conducted in Los Angeles in comparison to the national research database found in the *Trip Generation Manual, 10th Edition*.⁷⁵ Because data for most of the land uses in the *Trip Generation Manual* is based on suburban projects, LADOT recommends adjustments to those rates based on the urban setting in the City of Los Angeles and based on a particular project's proximity to transit. The TAG allows the following adjustments to trip generation rates:⁷⁶

LADOT encourages project applicants to design and construct transit-friendly Projects that create safe and walkable site design and facilities that connect Project patrons to and from transit stations and stops. Consistent with City policy goals to promote the use of transit and walking, LADOT, at its discretion, may allow up to a 25% transit/walk trip generation reduction, subject to the following guidelines, on a case by case basis:

- Developments above or adjacent to a Metro Rail, Metrolink, or Orange Line station, or to a similar dedicated transit line station with convenient pedestrian access to the station may qualify for a maximum 25% trip generation adjustment. The actual adjustment provided should be determined by an analysis of the transit service frequency and density at the specified transit station.
- Developments within a 1/4-mile walking distance of a transit station, or of a stop serving a Metro Next Gen Tier 1 service line, may qualify for up to a 15% trip generation adjustment. The actual adjustment provided will be determined by an analysis of the transit

⁷⁵ Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, 2017.

⁷⁶ Transportation Assessment Guidelines, Los Angeles Department of Transportation, August 2022, pages 3-10 and 3-11. The analysis in the TAG is based on well-developed and detailed research into the effectiveness of TDM strategies as applied to Southern California and City of Los Angeles developments. That research is described in the technical documentation for the LADOT VMT Calculator which can be found at www.ladot.lacity.org. See: City of Los Angeles Travel Demand Model, Fehr & Peers, Model Development Report, February 2018; City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020; and Attachment G TDM Strategies in LADOT VMT Calculator.

service frequency and density at the specified transit station or a stop serving a Metro Next Gen Tier 1 service line.

- If the development project is not within ¼-mile walking distance of a transit station or a stop serving a Metro Next Gen Tier 1 service line but is within a ¼-mile walking distance of other public bus stops, the project may still qualify for up to 10% trip generation adjustment. The actual adjustment provided will be determined by an analysis of the transit service frequency and density at the nearby bus stop(s).

Transit trip adjustment will not be automatically granted to development projects located in an area with infrequent transit service. However, all reasonable efforts by the developer to promote the use of public transit or walking will be considered for transit adjustments on a case-by-case basis.

The Project qualifies for the 15-percent trip generation adjustment based on the existing and future transit service in the vicinity of the Project Site as articulated in the second bullet point above. As shown in Figure 12 on page 43 of the Transportation Assessment, the Project Site is directly served by Metro Rapid Line 80, Metro Local Lines 14, 217, and 218, as well as LADOT DASH and Citywide local buses. In addition, the LADOT Assessment Letter dated November 16, 2021 (page 5) requires the Project to connect the Project Site to the planned Metro D (Purple) Line Wilshire/Fairfax Station currently under construction approximately 0.8 mile south of the Project Site via a shuttle bus system. The Wilshire/Fairfax Station is scheduled to be open prior to the buildout of the Project. Even without the Project's TDM Program or without the opening of the Wilshire/Fairfax Station, the Project would still qualify for the 15-percent adjustment due to the nature and frequency of the existing bus transit service immediately adjacent to the Project Site. The 15-percent adjustment is therefore conservative given the Project's additional TDM measures and the forthcoming opening of the new Wilshire/Fairfax Station.

Based on the location of the Project in the densely populated Central APC area and the high level of bus transit service in the vicinity of the Project, the 15-percent trip generation adjustment was applied to the trip generation estimates for the sound stage, production support, production office and general office uses. This adjustment was approved by LADOT as part of the MOU established prior to commencement of the analysis. LADOT's approval of the adjustment is set forth in both the MOU, which is included as Appendix A in the Transportation Assessment for the Project (Appendix M.1 of the Draft EIR) and in LADOT's final Assessment Letter approving the Transportation Assessment dated November 16, 2021, and included in the Draft EIR in Appendix M.2.

Trip generation rates for sound stages, production support, and production office uses were developed empirically from other studios in Los Angeles, as discussed in Topical Response No. 10, Trip Generation.

In consultation with LADOT as part of the MOU process, trip generation estimates for the sound stage, production support, and production office uses in the NBC Universal Studios Evolution Plan and other subsequent studio development plans also included the 15-percent transit/walk-in adjustment based on a studio's location in proximity to major transit (bus and/or rail) and their locations in denser areas of the City. As demonstrated in Topical Response No. 10, Trip Generation, those rates were found to be applicable to the Project even when including the 15-percent transit and walk-in adjustment.

The 15-percent adjustment is applied in Tables 6 and 7 of the Transportation Assessment, which show net new Project trip generation estimates and gross total Project Site trip generation estimates, respectively. As shown therein, by adding together the adjustment associated with proposed new development and existing space to remain, the 15-percent adjustment represents a total of approximately 192 trips during the morning peak hour and approximately 207 trips during the afternoon peak hour.⁷⁷ These adjustments were only applied to the peak-hour trip generation estimates used in the non-CEQA transportation analysis for the Project, and, therefore, do not affect CEQA transportation impact conclusions. Daily Project trip generation estimates for use in the VMT Calculator's Custom Land Use feature did not include the transit and walk-in adjustments because the VMT Calculator internally calculates those adjustments based on the location of the Project within the metropolitan area and the level of transit nearby. The 15-percent adjustment was not applied to the VMT Calculator's Custom Land Use feature and there was no double counting of this adjustment, as commenters incorrectly asserted.

The 15-percent adjustment in peak-hour vehicular trips used in the non-CEQA transportation operational analysis is based on trip generation studies and traffic counts conducted in Southern California and is consistent with LADOT and CEQA policies and procedures. The TAG's allowable transit trip adjustments are employed where applicable in transportation assessments prepared for projects throughout the City. The 15-percent adjustment represents a conservative estimate given the location of the Project, the amount of existing and future transit service to the Project Site, and the TDM Program that would be implemented by the Project. Further, although the Project includes a robust TDM Program aimed at reducing individual vehicle trips, the VMT analysis in the Draft EIR conservatively excluded most of the TDM measures for the purpose of determining whether

⁷⁷ These transit adjustments are calculated by adding the total peak-hour adjustments for proposed new construction from Table 6 of the Transportation Assessment and existing uses to remain from Table 7 of the Transportation Assessment.

the Project could have a significant impact on VMT. The Draft EIR concluded that the Project's transportation impacts would be less than significant.

Project TDM Program

Comments requested clarification of the additional TDM measures that would be added by the Project beyond the minimum TDM strategies needed to achieve the 15-percent trip adjustment level. As previously stated, although the Project would include the TDM Program, the effects of this program were not considered in the transportation analysis in the Draft EIR (including the non-CEQA analysis of intersection operating conditions) in order to present a more conservative (i.e., higher) estimate of Project impacts.

The Project proposes to incorporate several TDM features to help reduce VMT and vehicle trips to and from the Project Site consistent with City and State of California (State) transportation and GHG policies and objectives. Some of the TDM measures are inherent in the Project design and some additional TDM measures would be incorporated into the Project's operation. The following measures, among others, would be included in the Project's TDM Program to reduce VMT:

- Educational Program/On-Site TDM Coordinator
- Transportation Information Center/Kiosks via Mobility Hub
- Bicycle Parking and Amenities
- Pedestrian Amenities
- Shuttle Service
- Ride-Share Matching and Carpool/Vanpool Program
- Neighborhood Enhancements
- First-Mile/Last-Mile Options
- Carpool/Vanpool Parking and Loading via Mobility Hub
- Guaranteed Ride Home Program
- Transit Infrastructure Improvements

These features are discussed in detail in Section 4B of the Transportation Assessment on pages 115–118 and on pages 5–6 of the LADOT Assessment Letter dated November 16, 2021. The effectiveness of these TDM measures is discussed below.

Trip Reductions from the TDM Program

The Transportation Assessment assumed a 15-percent transit/walk-in adjustment on peak-hour trip generation estimates used for the non-CEQA analysis of intersection operations, as allowed by LADOT. That analysis conservatively did not assume additional trip reductions from the Project's TDM measures. Similarly, the Project's VMT analysis presented in Section IV.K, Transportation, of the Draft EIR assumed the VMT reductions inherent in the VMT Calculator based on the Project's location and employment profile, but conservatively excluded the effects of the Project's TDM measures. Based on published research and City policy, both the non-CEQA and CEQA transportation analyses could have accounted for substantial additional trip and VMT reductions due to the Project's TDM Program.

Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures (CAPCOA Report) (California Air Pollution Control Officers Association, 2021) provides, among other things, detailed analysis into quantifying how effective various TDM measures are at reducing VMT with a focus on project-level VMT reduction. The data provided in the CAPCOA Report is based on extensive research and technical analysis of empirical data collected at many sites employing one or more TDM measures. In response to comments about the potential effectiveness of TDM measures, the key measures to be integrated into the Project TDM Program are shown in Table II-11 beginning on page II-159, along with the CAPCOA Report calculations of their ranges of effectiveness. As shown therein, many of the proposed TDM measures have the potential, on their own, to reduce VMT by more than the 15-percent transit and walk-in adjustment assumed in the Transportation Assessment.

The LADOT VMT Calculator report provides guidance on maximum effectiveness of TDM programs when multiple measures are combined. The Project's location within the Central APC area would be classified as a "compact infill" setting (defined as within the central city or inner-ring suburb with high-frequency transit service). The VMT Calculator report identifies a maximum TDM reduction of 40 percent for compact infill sites. As shown in Table II-11, the TDM Program has the potential to reduce VMT between 6.9 percent and 40 percent, thus supporting the estimate of a 15-percent adjustment for transit and walk-in trips. The TDM Program is required per Project Design Feature TR-PDF-2 (see pages IV.K-37 to IV.K-40), which is included in the Mitigation Monitoring Program for the Project included as Section IV of this Final EIR.

Table II-11
Effectiveness of Transportation Demand Management Measures

CAPCOA Code and Measure Name		Measure Description	Range of VMT Reduction	Project Support
Quantified GHG Reduction Measures				
T-3	Provide Transit-Oriented Development	Locate a project in a walkable area with a mix of uses and access to transit.	6.9–31.0%	Proximity to bus lines on Beverly Boulevard, Fairfax Avenue, and 3rd Street, and the proposed Mobility Hub, which will include, among other things, a shuttle service to the Metro D (Purple) Line Wilshire/Fairfax Station. <i>Implementation requirement: LADOT Assessment Letter</i>
T-7	Implement Commute Trip Reduction Marketing	Use marketing strategies, promotions, and new employee orientations to encourage use of TDM programs.	0–4%	Quarterly newsletters, new-hire orientations, and events and promotions including financial incentives. <i>Implementation requirement: TDM Program</i>
T-8	Provide Ridesharing Program	Promote ridesharing with designated parking, loading and unloading areas, and offer ride-matching services	0–8%	Ride-matching and designated parking as well as financial incentives. <i>Implementation requirement: TDM Program</i>
T-10	Provide End-of-Trip Bicycle Facilities	Provide bicycle parking, showers, and lockers for employee use.	0.1–4.4%	Bicycle parking, including secure bike storage and repair services. <i>Implementation requirement: Regulatory</i>
T-18	Provide Pedestrian Network Improvements	Provide a pedestrian access network linking areas of the Project site to encourage walking instead of driving.	0.0–6.4%	Site plan includes pedestrian walkways and bridges. <i>Implementation requirement: Project Design Feature</i>
T-25	Extend Transit Network Coverage or Hours	Add or modify existing transit service or extend operating hours to enhance service near the Project Site.	0.0–4.6%	The proposed Mobility Hub, which will include, among other things, a new shuttle service to the Metro D (Purple) Line Wilshire/Fairfax Station. <i>Implementation requirement: Project Design Feature</i>
Overall Range of VMT Reduction			6.9%–40%^a	

Table II-11 (Continued)
Effectiveness of Transportation Demand Management Measures

CAPCOA Code and Measure Name	Measure Description	Range of VMT Reduction	Project Support
Non-Quantified GHG Reduction Measures			
T-32 Orient Project Toward Transit, Bicycle, or Pedestrian Facility	Minimize distance between the project and planned or existing transit, bicycle, and pedestrian corridors.		The proposed Mobility Hub, which will include, among other things, a shuttle service to the Metro D (Purple) Line Wilshire/Fairfax Station. <i>Implementation requirement: Project Design Feature</i>
T-34 Provide Bike Parking	Provide short-term and long-term bicycle parking facilities for employees and visitors.		Bicycle parking, including secure bike storage and repair services. <i>Implementation requirement: Regulatory</i>
T-35 Provide Traffic Calming Measures	Include pedestrian/bicycle safety and traffic calming measures on surrounding roadways.		Project will work with the neighbors to analyze and provide traffic calming measures in the adjacent north and west neighborhoods. <i>Implementation requirement: LADOT Assessment Letter</i>
Other Project Features That Could Reduce VMT			
T-2 Increase Job Density	Increased employment density results in shorter and fewer trips by single-occupant vehicles.		Project would increase employee concentration at the Project Site, which is surrounded by commercial and residential uses. <i>Implementation requirement: Project Design Feature</i>
T-19A Construct or Improve Bike Facility	Construct or improve a bicycle lane that connects to a larger bicycle network.		Proposed neighborhood bikeway and traffic calming improvements on Rosewood Avenue. <i>Implementation requirement: LADOT Assessment Letter</i>
<p>CAPCOA = California Air Pollution Control Officers Association</p> <p>From Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</p>			

Table II-11 (Continued)
Effectiveness of Transportation Demand Management Measures

CAPCOA Code and Measure Name	Measure Description	Range of VMT Reduction	Project Support
<p>(CAPCOA, 2021).</p> <p>^a The upper bound of VMT reduction is capped at 40 percent by the VMT Calculator based on the maximum value for compact infill areas identified in <i>Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures</i> (CAPCOA, 2010).</p> <p>Source: Gibson Transportation Consulting, Inc., 2023.</p>			

Consistency with LAMC Section 12.26 J (TDM Ordinance) and with the Proposed TDM Ordinance

LAMC Section 12.26.J, the City's TDM Ordinance (1993), establishes TDM requirements for non-residential projects greater than 25,000 square feet, which would include the Project. Key requirements of the TDM Ordinance, as applied to the Project, include providing a bulletin board or display case of transportation information, carpool/vanpool loading and designated parking areas, access from external circulation system to LAMC-required bicycle parking areas, pathways, or safe routes from development buildings to public sidewalks, and, if determined necessary by LADOT or the local transit agency, improved bus stops.

Commenters asked what mechanism would be used to ensure that the TDM Program would be both effective and ongoing. An updated TDM Ordinance is currently under evaluation and pending adoption by the City Council which currently includes provisions to require annual progress reports on the status and the effectiveness of a TDM program and annual reporting on the average vehicle ridership of the vehicles entering a project site. These annual reports will address the commenters' concerns regarding both the effectiveness and the continuity of the TDM Program.

Furthermore, the Project would comply with the requirements of the updated TDM Ordinance through the Project's design and TDM Program, which is discussed in detail in Section IV.K, Transportation, of the Draft EIR. The Project is consistent with LAMC Section 12.26.J as demonstrated in the consistency analysis summarized in Table 8 on page 97 of the Transportation Assessment (Appendix M.1 of the Draft EIR).

As previously described, the proposed TDM Ordinance is currently under consideration by the Los Angeles City Council and may be revised prior to final adoption. The Project meets the current requirements of the proposed TDM Ordinance. Page 5 of the LADOT Assessment Letter dated November 16, 2021 (Appendix M.2 of the Draft EIR) specifies that a final TDM Program for the Project must be approved by LADOT prior to the first certificate of occupancy for the Project. The final TDM Program would need to be in conformance with the TDM Ordinance in effect at the time of the certificate of occupancy.

Summary

The trip generation rates used in the Transportation Assessment account for the 15-percent transit and walk-in trip adjustment that LADOT has found to be applicable for projects in locations such as the Project Site. Thus, the trips estimated in the Transportation Assessment assume an adjustment of approximately 192 morning and approximately 207 afternoon trips when considering the gross Project Site trip generation. The full effects of the proposed TDM Program are not included in the non-CEQA

transportation analysis because the TDM effects only account for a 15-percent reduction in Project trips while the full effects of the proposed TDM Program are likely to reduce trips to a level lower than the trip estimates in the Draft EIR. Thus, the Transportation Assessment analysis is conservative.

B. Transit and TDM Effectiveness

Commenters suggest that the adjustment of Project trip generation by 15 percent may not be realistic for the Project. As described above in Section A, TDM Effects on Trip Generation, the 15-percent adjustment is estimated in the Transportation Assessment to reduce total Project Site vehicular trip generation by approximately 192 morning and 207 afternoon peak-hour trips due to a mode switch to transit and walking. This is based on the standard adjustment allowed by LADOT for all projects in Los Angeles located in an urban area served by a similar level of transit as in the vicinity of the Project Site.

As discussed in Section IV.K, Transportation, of the Draft EIR, the Project has committed to an extensive TDM Program as Project Design Feature TR-PDF-2 to encourage employees and visitors to use alternate means of transportation and reduce vehicle trips to and from the Project Site. All PDFs, including the TDM Program, would be included in the Mitigation Monitoring Program for the Project to ensure their implementation; refer to Section IV, Mitigation Monitoring Program. It is estimated that the TDM Program could reduce the Project's overall drive-alone automobile trips by an amount greater than the 15-percent adjustment taken in the non-CEQA operational analysis presented in the Draft EIR as supported by TDM research provided in the *Trip Generation Handbook, 3rd Edition*.

As stated on page 5 of the LADOT Assessment Letter (Appendix M.2 of the Draft EIR), a preliminary TDM Program would be prepared and provided to LADOT for review prior to the issuance of the first building permit for the Project, and a final TDM Program approved by LADOT is required prior to the issuance of the first certificate of occupancy for the Project. The Project's TDM Program would be implemented in a graduated manner with appropriate transportation options provided beginning with the first phase of the Project and continuing through ultimate completion.

Comments suggested that the assumed non-automobile use level outlined in the Project's Draft EIR was unachievable. However, there are many examples where the 15-percent level assumed for the Project was met and exceeded. NBC Universal, for example, worked with Metro to institute the business transit access pass (BTAP pass) as part of the E-Pass system that offers employees discounted or free transit rides with seven different transit agencies. Tax-free transportation incentives and programs like the shuttle bus connection to a subway station have decreased the single-occupant vehicle trips from

59 percent of peak-hour employee arrivals to 14 percent of employees in the initial pilot of this program.⁷⁸

As described above, the Project's TDM Program, which would be reviewed annually by LADOT and the Department of City Planning, has the potential to meet and exceed the automobile trip reduction levels evaluated in the Draft EIR.

⁷⁸ Interview with Joy Forbes, NBC Universal.

Topical Response No. 12. Safety and Congestion

Commenters expressed concern regarding the effects of Project trips on the roadway system serving the Project Site, particularly in the areas of increased congestion, and effects on traffic and pedestrian safety.

As discussed in Topical Response No. 8, Vehicle Miles Traveled, pursuant to SB 743, the transportation impact analysis required under CEQA was changed from vehicular delay (i.e., LOS) to VMT. Accordingly, the Project's transportation analysis and resulting impacts were assessed in the Draft EIR using VMT methodology in accordance with CEQA and LADOT policy. In addition, SB 743 requires that projects be evaluated on the basis of consistency with existing local and regional plans, traffic safety (including emergency vehicle access), and geometric design hazards as part of the CEQA transportation analysis. As part of the non-CEQA transportation analysis, the Transportation Assessment, which is included as Appendix M.1 of the Draft EIR, includes a non-CEQA analysis of Project Site access, traffic operations, and circulation.

Therefore, the information below is provided for informational purposes only to respond to commenters' concerns and not as the basis for determining (or mitigating) potentially significant environmental impacts under CEQA.

A. Queuing at Project Driveways

Project Site Access

Commenters were concerned with the number of Project driveways and their potential effects on pedestrians using the sidewalks around the Project Site. They were also concerned about the potential for entering Project vehicles to queue at the Project driveways and back up into the public streets.

Access to the Project Site would be through controlled lanes in accordance with standard security procedures for studio lots. Employees would receive an identification badge to allow them to enter the Project Site through any lane at the vehicular gates. Visitors would be directed to a specific lane at each of the three signalized entrances where security will check their identification and issue a pass and directions to parking.

Employees and studio vehicles would be able to enter and exit through any gate, while visitors to the Project Site would be required to enter at one of the three signalized entrances.

Audience members would receive instructions with their tickets, coordinated between individual productions within the Project Site, advising them which of the three signalized entrances to use to enter the Project Site, and they would be directed to park in a specific parking location within the Project Site.

Queuing at Project Driveways

Queue lengths at the Project driveways were evaluated and summarized in Section 5B of the Transportation Assessment as part of the non-CEQA transportation analysis. This analysis was conservatively assessed without consideration of trip reductions as a result of the proposed TDM Program. Public comments expressed concern that vehicles entering the Project Site driveways could back up onto the public streets and become a safety hazard if the inbound gate controls were placed too close to the arterial streets or if the processing time at the inbound gates was excessive. LADOT requires the analysis of queuing at controlled Project driveways to ensure that Project vehicles would not back up into the public streets, thereby potentially becoming a public safety issue. The analysis of Project queuing also falls under CEQA Threshold XVII.c, related to geometric design, in Appendix G of the CEQA Guidelines.

The inbound queues at the Project driveways were extensively analyzed, and the inbound and outbound control points have been located to minimize the potential for vehicle back-ups onto the adjacent public street system. LADOT requires a minimum distance between the adjacent street and any inbound parking gates of 60 feet for any driveway serving more than 300 parking spaces.⁷⁹ In all cases at the Project Site, the location of the inbound gates exceeds the LADOT distance criteria to minimize the chance of inbound Project vehicles backing up across the public sidewalk or backing out into the street.

As discussed in Section IV.K, Transportation, and shown in Figure IV.K-3 on page IV.K-43 of the Draft EIR, vehicular access to the Project Site would be provided via nine vehicular access points: three driveways along Beverly Boulevard, including one entry/exit driveway and two right-in/right-out driveways; three driveways along Fairfax Avenue, including one entry/exit driveway and two right-in/right-out driveways; one entry/exit driveway on The Grove Drive; and two right-in/left-out entry/exit driveways along the Southern Shared Access Drive, accessed from The Grove Drive. Any new driveways would be designed in accordance with the standards set forth in the LADOT Manual of Policies and Procedures and subject to the approval of LADOT and the Los Angeles Bureau of Engineering.

⁷⁹ LADOT Manual of Policies and Procedures, Section 321, 2020.

Figure 22 in the Transportation Assessment shows the morning and afternoon peak-hour traffic volumes entering and leaving the Project Site at each driveway. These volumes include automobile and truck trips generated by employees, visitors, audience members, and service vehicles. The volumes shown in Figure 22 of the Transportation Assessment include the pre-COVID vehicle flow in and out of each driveway and the projected volume from the full buildout of the Project Site.

Detailed LOS and queuing analysis worksheets are provided in Appendix G of the Transportation Assessment.

Although not required by LADOT or the TAG, to validate that the proposed vehicular entrance gate locations and queuing areas are adequate in response to comments, new inbound queuing data was collected at three Southern California studios (i.e., Television City, Radford Studio Center, and The Culver Studios) in June 2022 to record accumulated queues and inbound processing time at the vehicular entrances to these three studios. The data found that different types of inbound trips required varying amounts of processing time before a vehicle was allowed to enter the studio. The upper end of the processing time range for each vehicle type is shown in Table II-12 on page II-168.

These processing times were used to test queue lengths that would be generated by the entering volumes found in Figure 22 in the Transportation Assessment. A random arrival pattern based on the Poisson Distribution⁸⁰ was used to generate the hourly pattern of arrivals over the course of the morning and afternoon peak hours. Two hours of arrivals were tested for each peak hour to calculate the queue lengths at the entry gates based on the volume and type of entering vehicles and the number of entry gates available to service the entering volume. A simulation was conducted testing the random arrival patterns generated by the Poisson Distribution, and the simulation was conducted a total of 1,000 times to determine the queue length patterns. Table II-13 on page II-168 shows the results, provided in detail in the Processing Time and Queuing Memorandum included as Appendix FEIR-7, indicating the queues at the three signalized entrances to the Project Site.

⁸⁰ The Poisson Distribution is a mathematical distribution that expresses the probability of a given number of events occurring in a fixed interval of time, which is used as the industry standard for testing queue requirements. It was used to turn average vehicle arrival rates into a randomized arrival pattern in order to determine the statistical probability that a given queue length would occur during a peak hour. The result of a Poisson Distribution is reported in percentiles; i.e., the 95th percentile queue length means that this length would only be exceeded in 5 percent of the peak hours. For the Project, the 95th percentile queue length was used as the criteria for establishing minimum storage areas for the inbound gates.

Table II-12
Queuing Processing Time

Vehicle Type	Average Processing Time (seconds/vehicle)^a
Employee	9
Visitor/Audience	60
Truck	30
^a Empirical data from field studies of inbound gate queues and processing times at Television City, Radford Studio Center, and The Culver Studios during the morning and afternoon peak inbound times, collected by Gibson Transportation Consulting, Inc. in June 2022.	

Table II-13
Maximum Inbound Queues at Signalized Project Driveways

Hourly Period	Maximum Number of Vehicles in Queue (per Lane)					
	Fairfax Avenue		Beverly Boulevard		The Grove Drive	
	85th Percentile	95th Percentile	85th Percentile	95th Percentile	85th Percentile	95th Percentile
A.M. (8–10 A.M.)	3	4	2	2	2	3
P.M. (4–6 P.M.)	1	2	1	1	1	1

The 95th percentile queue means that the line of vehicles will be equal to or less than this number 95 percent of the time during the peak hours and is the industry design standard for queuing considerations.

The 95th percentile queue lengths⁸¹ and indoor gate storage dimensions at the three signalized driveways are as follows:

Location	95th Percentile Queue Length	Inbound Gate Storage
Fairfax Avenue	100 feet	100 feet
Beverly Boulevard	50 feet	125 feet
The Grove Drive	75 feet	160 feet

⁸¹ Based on 25 feet per vehicle.

Accordingly, adequate storage is provided at each gate to accommodate even the 95th percentile queue length anticipated.

As shown in Figure 22 in the Transportation Assessment, the inbound demands at the unsignalized driveways are far less than any of the three signalized driveways. The placement of the inbound gates at these driveways would follow LADOT gate control requirements (i.e., would not be located closer than 60 feet from the property line).

Overall, adequate queuing storage would be provided at each Project driveway to minimize the potential for vehicles to back out into the adjacent arterial streets.

Access to The Grove Drive

Commenters suggested that the Project should not include access to/from The Grove Drive and that all Project Site access points should be located along Fairfax Avenue and Beverly Boulevard. The Project Site has approximately 400 feet of frontage on The Grove Drive, a public street which is used almost exclusively by automobiles, and has the same right to access the street as any other adjacent property. This suggestion conflicts with the need to minimize pedestrian/vehicular conflicts because the amount of existing and expected future pedestrian traffic along the sidewalks on Fairfax Avenue and Beverly Boulevard is far higher than the amount of pedestrian traffic along The Grove Drive. Further, from an operational standpoint, The Grove Drive has more available operating capacity than either Fairfax Avenue or Beverly Boulevard.

LADOT's *Manual of Policies and Procedures* (2020) provides driveway location planning guidance in Section 321.V, which calls for "the minimum number of driveways, consistent with street and lot capacity, *located on streets with the least traffic volume*, when there is a choice" (emphasis added). It also requires the "minimum potential for pedestrian and bicycle facility conflicts and traffic accidents." Therefore, locating a driveway on The Grove Drive is not only operationally preferable, but is required for compliance with LADOT policies.

Eliminating Project vehicular access on The Grove Drive would cause increased congestion along all surrounding streets as well as increase pedestrian/vehicle conflicts. Contrary to public comments, allowing Project vehicular access along The Grove Drive would reduce potential adverse operational effects along Fairfax Avenue and Beverly Boulevard and reduce pedestrian conflicts along the adjacent arterial streets. Additionally, in accordance with LADOT's TAG, this analysis is a non-CEQA transportation analysis, and these effects are not considered transportation impacts under CEQA.

Queuing at Adjacent Study Intersections

LADOT requires an analysis of turning movement queue lengths at study intersections as part of the non-CEQA operational analysis. In the case of the Project, there were intersections where future queue lengths are projected to exceed the available turn lane storage length. Commenters asked about potential solutions for these instances.

Table 19 of the Transportation Assessment (Appendix M.1 of the Draft EIR) summarizes the Project's effect on turn lane queuing, and states that there would be up to eight intersections where Project trips would result in queues exceeding the available turn lane lengths. Three of these intersections have queue exceedances at multiple turn lanes, as described in Table 19 and on pages 164 and 165 of the Transportation Assessment. Consistent with LADOT policies, measures to help alleviate these conditions have been included in the Project's transportation improvement program (described in Topical Response No. 15, Transportation Improvement Program, below and in Tables 23 and 24 on pages 190 and 191 of the Transportation Assessment) in the form of TDM strategies and traffic signal and operational improvements along the High Injury Network (HIN) corridors.

B. Level of Service

Driveways

Commenters suggest that the Project driveways would be congested and interfere with the operation of the public streets adjacent to the Project Site. However, in accordance with LADOT's TAG, this analysis is a non-CEQA transportation analysis, and these effects are not considered transportation impacts under CEQA. LOS and vehicle delay cannot be considered significant environmental impacts under CEQA as a matter of state law. For informational purposes, the LOS at each driveway around the Project Site was tested for Future with Project conditions, and these results are summarized in Table 20 of the Transportation Assessment. As detailed in the LOS and queuing analysis worksheets provided in Appendix G of the Transportation Assessment, operation of the Project driveways indicates an acceptable LOS performance (LOS C or better) and is not expected to cause congestion along the arterial streets adjacent to the Project Site.

Intersections

Commenters incorrectly refer to the Project's LOS effects, including those on intersections, as CEQA impacts. However, any Project effects related to increased congestion are no longer considered to be CEQA-related impacts requiring mitigation and under state law LOS and vehicle delay cannot be considered significant environmental impacts as a matter of law.

As part of the non-CEQA transportation analysis, Section 5B of the Transportation Assessment details the LOS operations at the 31 study intersections selected for operational evaluation.

The CEQA Guidelines allow cities to study the effects of new projects on the operation of the transportation system, but the addition of roadway capacity as the primary means to deal with increased congestion is discouraged because increased capacity generally leads to increased VMT.⁸²

As an alternate to the continuation of widening roadways to increase capacity, the TAG recommends that proposed non-CEQA improvement measures or corrective actions should support improvements that increase safety and reduce GHG emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and promote other modes of travel. The TAG recommends that project improvement programs be consistent with the City's policies and procedures to implement various TDM strategies as part of a comprehensive TDM Program.

Thus, the Project does not need to provide any capacity mitigations because, by the required evaluation criteria, LOS changes are not considered CEQA environmental impacts nor are capacity-enhancing improvements encouraged or even permitted.

C. Traffic Safety vs. Congestion

Commenters expressed concerns that Project trips will lead to increased congestion which in turn will lead to increases in traffic collisions.

Although congestion and collisions are not CEQA impacts, this Topical Response discusses the balance between safety improvements and congestion relief. Again, Project effects related to increased congestion are no longer considered to be CEQA-related impacts requiring mitigation and, under state law, LOS and vehicle delay cannot be considered significant environmental impacts as a matter of law.

Acceptable Response to Increased Congestion

The CEQA Guidelines allow cities to study the effects of new projects on the operation of the transportation system, but the addition of roadway capacity as the primary

⁸² OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, Appendix 2.

means to deal with increased congestion is discouraged because increased capacity generally leads to increased VMT.⁸³

As described above in Section B, Level of Service, street widening is no longer an acceptable transportation improvement because it can lead to an increase in overall VMT. Rather, per State and City requirements, project improvement programs should focus on implementing various TDM strategies as part of a comprehensive TDM program.

As discussed in Topical Response No. 7, Mobility Hub, the Project would include an on-site Mobility Hub to promote alternative travel modes and various TDM measures to improve the overall pedestrian and bicycle environment with wider sidewalks, landscape elements, improved transit facilities, and funding for bicycle infrastructure in the vicinity. The proposed TDM Program and additional improvements would reduce single occupancy vehicle trips to and from the Project Site, improve circulation in the vicinity, and encourage multi-modal mobility options. A full list of TDM strategies to be implemented by the Project is detailed in Section 4B of the Transportation Assessment.

Additionally, the Applicant would implement various improvements in the vicinity of the Project Site. These improvements, detailed in Chapter 6 of the Transportation Assessment and included in the LADOT Assessment Letter, include Vision Zero safety upgrades, and traffic signal controller, sensor, and monitoring upgrades for the City's Automated Traffic Surveillance and Control (ATSAC) system. These improvements are required by Project Design Features TR-PDF-3 and TR-PDF-4 (see pages IV.K-40 to IV.K-41 of the Draft EIR) and are included in the Mitigation Monitoring Program included in Section IV of this Final EIR. The Project's contributions would help complete the implementation and upgrades of the ATSAC system along key corridors around the Project Site, including Fairfax Avenue, Beverly Boulevard, and The Grove Drive. These improvements increase safety for users by improving the vehicular flow of traffic and enabling the implementation of advanced pedestrian safety features.

Vision Zero

The City's Vision Zero program is a traffic safety program that promotes strategies to eliminate traffic deaths in Los Angeles. Vision Zero has identified the HIN, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. As shown in Figure 11 of the Transportation Assessment, the Project Site is located adjacent to Fairfax Avenue,

⁸³ OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, Appendix 2.

Beverly Boulevard, and within the vicinity of West 3rd Street, which are all included in the City's HIN.

The focus of LADOT's approach to improving traffic safety along the HIN is to reduce injury collisions and eliminate fatalities. As discussed in Section IV.K, Transportation, of the Draft EIR, the Project includes Project Design Feature TR-PDF-3 to implement certain off-site Vision Zero safety improvements and provide a financial contribution toward the funding of pedestrian facilities and safety improvements within the Study Area. The Project's improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City—an expressed concern of commenters. These improvements, along with the TDM Program, which is discussed in Topical Response No. 11, Transportation Demand Management, would reduce trips to/from the Project Site and would advance the transportation safety goals of the Vision Zero program.

D. Emergency Access

Commenters expressed concern regarding the adequacy of emergency access and emergency response times.

Emergency Site Access

As detailed in the Draft EIR on pages IV.K-80 and IV.K-82 to IV.K-83 in Section IV.K, Transportation, of the Draft EIR, the Project's impacts related to emergency access would be less than significant, and therefore no mitigation would be required under CEQA. The Conceptual Site Plan includes both access and internal circulation components that would enhance emergency access to the Project Site. New and redesigned Project driveways would provide increased emergency access to the Project Site with new signalized driveways provided along both Fairfax Avenue and The Grove Drive and a redesigned signalized driveway along Beverly Boulevard. Thus, as further discussed below, emergency access to the Project Site via Beverly Boulevard, 3rd Street, and Fairfax Avenue would be maintained and improved.

The new signalized access driveway along The Grove Drive would provide additional emergency vehicles access to the Project Site that does not exist today. Emergency vehicles approaching from the east on Beverly Boulevard or on 3rd Street would be able to use the new driveway on The Grove Drive to access the Project Site. Emergency access on the west side of the Project Site is available through the new signalized driveway at Fairfax Avenue and 1st Street.

The unsignalized driveways along Fairfax Avenue, Beverly Boulevard (one to the east and one to the west of the existing Genesee Avenue driveway), and along the

Southern Shared Access Drive would increase the accessibility of the Project Site for emergency vehicles.

In addition, as discussed on pages IV.K-42 through IV.K-44 of the Draft EIR, adequate circulation roads/paths would be provided within the Project Site to accommodate the production activity and emergency access throughout the campus. The Project's internal circulation system, described on page IV.K-42 of the Draft EIR and shown in Figure IV.K-3 on page IV.K-43 of the Draft EIR, shows that emergency vehicles can enter the Project Site at any of the three major signalized driveways and reach any part of the Project Site to deal with an emergency situation. Pages IV.K-42 to IV.K-44 of the Draft EIR describes the multi-level internal circulation plan that would be provided to allow emergency vehicles to reach any part of the Project Site to handle emergencies.

Emergency Response Times

Commenters expressed concern that the addition of Project trips to the roadways serving the Project Site would cause an unacceptable increase in emergency vehicle response times in the area.

On the external streets serving the Project Site and the surrounding neighborhoods, pursuant to California Vehicle Code (CVC) Section 21806, emergency vehicles are generally able to avoid or maneuver through traffic in the event of an emergency by using lights and sirens to clear a path of travel or by driving in the travel lanes of opposing traffic.

As discussed in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, the two closest fire stations to the Project Site are:

- Fire Station #61—5821 W. 3rd Street
- Fire Station #41—1439 N. Gardner Street

Three other fire stations are also available to serve emergencies at the Project Site, but these two are the closest stations. See pages IV.J.1-14 to IV.J.1-16 in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR for a more detailed discussion of the available station locations and services.

Intersection LOS along the fire service routes for Fire Stations #61 and #41 are shown in Figure II-3 on page II-175.



Fire Station #61 is the closer of the two located approximately 1.2 miles southeast of the Project Site along 3rd Street. It is designated as the “first-in” station in the event of an emergency. The trip from the station to the Project Site would take approximately 5 minutes under mid-day traffic conditions.

An alternate route from Fire Station #61 would be 3rd Street to The Grove Drive to the signalized driveway along The Grove Drive. This would allow the responding fire truck to utilize Fairfax Avenue for less time and likely reduce their response time to the Project Site.

Fire Station #41, designated as the secondary station in the event of an emergency, is located approximately 1.9 miles north of the Project Site. The primary route from the station to the Project Site would be along Fountain Avenue to Fairfax Avenue to the Project Site. This trip would take approximately 10 minutes under mid-day traffic conditions.

An alternate route from Fire Station #41 would be straight south on Gardner Street to Beverly Boulevard with a left turn into the Project Site at Genesee Avenue.

As discussed above and in Section IV.K, Transportation, Section IV.J.1, Public Services—Fire Protection, and Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of the Draft EIR, the Project would provide adequate emergency access. Therefore, the Draft EIR correctly concluded that the Project’s impact on emergency access and fire-related services would be less than significant.

E. Pedestrian Safety at Project Driveways

Commenters requested that the Project include fewer driveways in order to minimize pedestrian and vehicular conflicts at each driveway and the potential bicycle conflicts along the perimeter of the Project Site.

The Project would include nine driveways along the four streets surrounding the Project Site as outlined in Figure IV.K-3 on page IV.K-43 and described on pages IV.K-41 to IV.K-45 of Section IV.K, Transportation, of the Draft EIR and in Section II, Project Description, of the Draft EIR. Of this total, two driveways along Fairfax Avenue and one active driveway along Beverly Boulevard already exist. As such, the approximately 744,000 square feet of existing development on the Project Site is served by three driveways, which, for approximation purposes, each could serve approximately 250,000 square feet of development.

The proposed access plan for the Project Site includes three signalized driveways and six unsignalized driveways to serve the proposed 1,874,000 square feet of development, or approximately 208,000 square feet of development per driveway, which is an approximately 15-percent reduction in the driveway service rate from the existing studio. As such, the increase in the number of driveways is proportional to the increase in the size of the development. This analysis is based on the driveway layout shown in Figure II-7, Illustrative Vehicular Site Access, in Section II, Project Description, of the Draft EIR.

There are several potential disadvantages to decreasing the total number and consolidating the driveways for the Project Site:

1. Consolidating driveways could require specific types of vehicles to mix in a way that jeopardizes safety and/or creates queuing issues.
2. Consolidating driveways would increase the vehicular activity levels at the remaining driveways, which would mean more vehicles on the three main entrances and a greater mixing of trucks with employee and visitor automobiles. It could also result in the need for wider driveways which would conflict with the Los Angeles Department of City Planning Citywide Design Guidelines.
3. More vehicles at the remaining driveways would increase queues at the Project driveways and the potential for backing out onto the public streets. Fewer driveways would create longer inbound and outbound queues.
4. Fewer driveways would force more vehicles to the three signalized driveways, which would in turn mean longer portions of the traffic signal cycle would have to be allocated to the traffic entering/leaving the Project Site, thereby increasing delays along the main streets.
5. The number and location of the Project driveways were specifically designed to minimize potential queuing and traffic along the key arterials.

Typically, the design of a project's access and circulation system is primarily a non-CEQA operational issue. In summary, the number and location of the Project driveways has been carefully planned to balance pedestrian safety with operational effects. The detailed design of each of these driveways would be approved by LADOT as part of the design and construction process, and safety issues like safe sight distance and pedestrian control across the signalized locations would be included in the detailed driveway designs.

Topical Response No. 13. Parking

Comments regarding the Project's parking supply expressed concern that the overall parking supply for the Project was not sufficient to keep spillover parking out of their neighborhoods. However, pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration.⁸⁴ (Public Resources Code § 21099, subd. (b)(3) ["the adequacy of parking for a project shall not support a finding of significance pursuant to this section."].) As such, this Topical Response has been prepared for informational purposes only and is not the basis of determining or mitigating environmental impacts under CEQA.

Parking ratios for the various uses set forth under LAMC Section 12.21 A do not include studio or production-related uses. Under LAMC Section 12.21 A.4.c, the general commercial and industrial parking ratio of two parking spaces per 1,000 square feet of floor area would apply to most of the existing and proposed studio uses on the Project Site. However, this generalized ratio does not reflect the actual parking demands of the existing and proposed studio uses.

The LAMC specifies a parking requirement for various land uses within the City by establishing a parking ratio that should be provided when a new project is proposed or an existing building is modified (either in size or in land use). These parking ratios are generally based on the parking demand experience at other similar types of land uses throughout the City. Parking ratios also change as a result of new transportation opportunities being added to areas of the City. Parking requirements in downtown Los Angeles (DTLA), for example, are lower⁸⁵ than those in suburban areas because more transit availability allows employees and residents to travel to and from DTLA without needing a parking space.

While the LAMC contains parking requirements for many land uses, there are specific land uses that are not covered, including sound stages and production support uses.

Accordingly, the parking regulations detailed in the Preliminary Draft Specific Plan were developed based on a studio-specific parking analysis that utilized empirical data

⁸⁴ See CEQA Guidelines § 15064.3, which describes specific considerations for evaluating a project's transportation impacts.

⁸⁵ See LAMC Section 12.21.A.4.i providing exceptions to off-street parking requirements for the DTLA Business District.

from the existing studio as well as other studio campuses in Los Angeles, described further below.

The Project would provide sufficient on-site parking to meet the needs of employees and visitors to the Project Site. As stated on page IV.K-44 in Section IV.K, Transportation, of the Draft EIR, consistent with the Project Description and environmental analysis provided in the EIR, the proposed Specific Plan would establish parking requirements for each of the permitted land uses (i.e., sound stage, production support, production office, general office, and retail), ranging from two to three parking spaces per 1,000 square feet of floor area, for a sitewide total of approximately 5,300 parking spaces upon full buildout of the total floor area permitted under the proposed Specific Plan.⁸⁶

As discussed on page IV.K-44 of the Draft EIR, vehicles may be parked in tandem or by valet or attendants, depending on the specific parking layout. In addition, the proposed Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, as long as an adequate parking supply is maintained. Parking would be provided on-site and would be located in above-ground structures, subterranean structures, and/or surface spaces and would be designed to accommodate traditional, semi-automated, and/or fully automated parking operations. Refer to Figure 1, Conceptual Site Plan, of the Transportation Assessment (Appendix M.1 of the Draft EIR), which shows the proposed parking locations. The parking locations shown therein are consistent with the Project's plans, which are publicly available on the Department of City Planning website. Internal vehicular roadways and pedestrian paths would be utilized throughout the Project Site to facilitate efficient circulation and access to all buildings and parking areas from the various Project driveways. Additionally, on-site parking for production vehicles would be provided adjacent to the proposed sound stages and in other dedicated basecamp areas. Lastly, existing uses and facilities may be maintained without changes in their respective existing parking requirements.

A. Parking Supply

Commenters expressed concern over the total amount of on-site parking proposed by the Project. Public comments suggested that the Project should provide less parking as an incentive to encourage studio employees and visitors to utilize alternate means of transportation, while others expressed concern that the Project is not proposing enough on-site parking spaces, which could result in spillover parking into the adjacent neighborhoods or the adjacent commercial properties.

⁸⁶ Please note that the Draft EIR stated that one to three parking spaces would be required, which has been corrected to two to three parking spaces; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The Project's proposed parking, which is not a CEQA transportation impact consideration, were independently developed from proprietary empirical parking demand data collected over the past 20 years at the Project Site and other studios in Southern California, including but not limited to NBC Universal, Paramount Pictures, The Culver Studios, and Sony Pictures. This demand data, as it is not a CEQA transportation impact consideration, is not publicly available. As previously mentioned, parking demand rates have been separated into the components of a studio campus (i.e., sound stage, production support, production office, general office, etc.) based on the empirical parking study data collected. These component rates were used to develop the proposed parking requirements for the Project.

The two primary parking objectives of the Project are: (1) to provide sufficient parking on-site to meet the demands of the proposed Project and prevent spillover parking; and (2) to encourage and support alternative transportation modes and to support trip and emission reduction goals. To address the first objective, as discussed below, parking requirements were analyzed for each of the five permitted land uses. To address the second objective, the Project would implement a TDM Program discussed in detail in Topical Response No. 11, Transportation Demand Management, which would include measures to reduce parking demand.

The parking analysis for the Project analyzed the demand for parking on-site from three different perspectives:

- LAMC Requirements
- Employee and Visitor Parking Needs
- Shared Parking Among the Various On-Site Land Uses

These three considerations are discussed below.

LAMC Parking Regulations

Assembly Bill (AB) 2097, which became effective on January 1, 2023, is a new State law that prohibits public agencies and cities from imposing a minimum automobile parking requirement on most development projects located within a one-half mile radius of a major transit stop. This bill would apply to the Project Site. Accordingly, the parking requirements discussed in the Draft EIR that would be implemented under the proposed Specific Plan have been clarified to be the proposed parking ratios to meet the studio's peak parking demands.

The LAMC includes specific parking ratios for off-street parking for various land uses. For the Project, however, three of the five permitted land uses are not included in the LAMC land use descriptions: sound stage, production support, and production office uses. Applying the most applicable land use categories to the Project under LAMC Section 12.21 A, and as shown in Table II-14 on page II-182, the Project would need a total of approximately 5,236 parking spaces.

Employee/Visitor Population

Commenters have questioned how the number of employees on-site, in addition to visitors and audience members, can be served by 5,300 parking spaces. However, requiring a 1:1 ratio of employees/visitors to parking spaces would result in far more parking spaces than needed to satisfy demand, would exceed LAMC ratios, and would not take into account the implementation of AB 2097.⁸⁷ Like other studio campuses, the actual ratio of parking demand to employees/visitors is always lower than 1:1 and is substantially less than the number of people on-site at any given point, which is also generally less than the total number of people employed at the Project Site (depending on the number of visitors and audience members at any given time).

An analysis of the on-site visitors and employees confirms that the Project could be fully served by a parking supply of approximately 5,243 spaces on a peak weekday. On a weekday evening, the parking demand would be approximately 1,160 spaces, or approximately one-quarter of the weekday daytime demand because of the substantial reduction in employee evening parking demand.

Similarly, the weekend parking demand at the Project Site would be dramatically lower than weekday demand because most of the studio and office space would be lightly used on weekends.

Shared Parking

The proposed Specific Plan parking ratios were developed based on the results of the proprietary parking demand analyses conducted on the Project Site and other studios in Southern California as discussed above.⁸⁸ In order to validate and verify these ratios, a

⁸⁷ AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop.

⁸⁸ Shared parking analyses and the resulting parking demand ratios by land use typically represent data closely held by studio owners and operators. The data used in the Project analysis is based on parking occupancy counts and shared parking analyses reported in public Draft EIRs and Shared Parking (Footnote continued on next page)

**Table II-14
LAMC Parking Ratios for the Proposed Development Program**

Use	Square Feet	LAMC Parking Rate Analysis	
		Required Parking	Parking Ratio
General Office	700,000 sf	1,400 sp	Commercial and Industrial Buildings—LAMC 12.21 A.4.c (2 per 1,000 sf)
Production Office	700,000 sf	1,400 sp	Commercial and Industrial Buildings—LAMC 12.21 A.4.c (2 per 1,000 sf)
Sound Stage (No Audience)	250,000 sf	500 sp	Commercial and Industrial Buildings—LAMC 12.21 A.4.c (2 per 1,000 sf)
Sound Stage (Audience)	100,000 sf	1,714 sp	General Auditorium, Theatre, or other similar place of assembly—LAMC 12.21 A.4.e (1 per 35 sf) *reduced by 40 percent based on "Assembly Area" vs. "Accessory Areas."
Production Support	104,000 sf	22 sp	Warehouse—LAMC 12.21 A.4.c.1 (2 per 1,000 sf for first 10,000 sf + 1 per 5,000 sf for space over 10,000 sf)
Retail	20,000 sf	200 sp	Restaurants and Bars, General—LAMC 12.21 A.4.c.3 (10 per 1,000 sf)
Total	1,874,000 sf	5,236 sp	
<p><i>sf = square feet</i> <i>sp = spaces</i> <i>Requirements based on restaurant space and 100,000 sf of audience sound stages.</i> <i>Retail calculated at "Restaurants and Bars, General." Childcare use assumed to be 100 percent Internal Capture.</i> <i>Source: Gibson Transportation Consulting, Inc., 2023.</i></p>			

shared parking analysis was conducted for the Project Site under existing and future conditions, and the results were compared to the proposed Specific Plan parking requirements. A shared parking analysis adjusts the projected parking demand at the Project Site based on seasonal, hourly, monthly, and weekday vs. weekend experience patterns at the Project Site. Rather than simply adding the peak parking demand for each separate land use together to calculate the aggregate peak demand, the shared parking model accounts for the temporal differences in these peaks to determine how many parking spaces can effectively be shared between multiple land uses that have different peak times. By applying the peak adjustment factors to each individual land use within the Project Site, the actual overall peak demand can be determined.

analyses prepared for Television City, NBCUniversal, Paramount Picture Studios, and other studio locations in Southern California.

The shared parking analysis calculated the parking demand of the five permitted land uses on an hour-by-hour basis to demonstrate the adequacy of the overall parking supply to meet the peak parking demand. Table II-15 through Table II-20 on pages II-184 through II-190, respectively, show the results of a shared parking analysis using the shared parking model developed by the Urban Land Institute (ULI) and the National Parking Association (NPA).⁸⁹ This model represents the national standard for calculating the shared parking demand in mixed-use developments.

Table II-17 and Table II-18 on pages II-187 and II-188 show the weekday and weekend peak parking demands, respectively, for each month of the year. The peak parking demand at the Project Site would occur in January through May and again in the fall when filming and audience shows are most active. Industry standards call for a parking surplus of approximately 5 percent for employment-based parking supplies to accommodate peak fluctuations in parking demand. The difference between the peak demand of 5,081 and the proposed 5,300 space supply reflects this recommended surplus.

Finally, Table II-19 and Table II-20 on pages II-189 and II-190 show the hourly parking demand throughout the day on the peak weekday and peak weekend day of the year (in March). The peak weekday parking demand is the greatest in the morning hours, with the demand dropping in the afternoon and evening hours. As shown in Table II-20, the peak weekend parking demand is less than 1,200 spaces at any given time.

Parking Supply Summary

The proposed parking ratios in the Preliminary Draft Specific Plan are developed based on the various factors discussed above, which would allow the Project Site to provide sufficient parking on-site to meet the peak day Project demands and prevent spillover parking. Spillover parking is discussed further below in Section C, Parking Spillover into the Adjacent Neighborhoods and Properties.

⁸⁹ Urban Land Institute, International Council of Shopping Centers, National Parking Association, Shared Parking, 3rd Edition, 2020.

Table II-15
Peak Parking Demand Summary: Shared Parking Demand Summary (Peak Month: March; Peak Period: 10 A.M., Weekday)

Land Use	Project Data Quantity	Weekday				Weekend				Weekday			Weekend		
		Base Ratio	Driving Adj.	Non-Captive Ratio	Project Ratio	Base Ratio	Driving Adj.	Non-Captive Ratio	Project Ratio	Peak Hr. Adj. (10 A.M.)	Peak Mo. Adj. (March)	Estimated Parking Demand	Peak Hr. Adj. (11 A.M.)	Peak Mo. Adj. (March)	Estimated Parking Demand
Retail															
Retail/Restaurant	20,000 sf GLA	8.00	100%	90%	7.19 ksf GLA	8.00	100%	98%	7.85 ksf GLA	60%	97%	83	90%	97%	137
Employee		2.00	100%	100%		2.00	100%	100%		75%	97%	29	95%	97%	37
Food and Beverage, Entertainment and Institutions, Hotel and Residential, Office															
Production Office	700,000 sf GFA	0.20	100%	100%	0.20 ksf GFA	0.02	100%	100%	0.02 ksf GFA	100%	100%	140	100%	100%	14
Reserved	0 emp	0.12	100%	100%		0.12	100%	100%		100%	100%	84	100%	100%	84
Employee		2.28	100%	100%		0.38	100%	100%		100%	100%	1,596	100%	100%	266
General Office	700,000 sf GFA	0.30	100%	100%	0.30 ksf GFA	0.03	100%	100%	0.03 ksf GFA	100%	100%	210	100%	100%	21
Reserved	0 emp	0.15	100%	100%		0.15	100%	100%		100%	100%	105	100%	100%	105
Employee		2.85	100%	100%		0.65	100%	100%		100%	100%	1,995	100%	100%	455
Additional Land Uses															
Sound Stage	250,000 sf GFA	0.20	100%	100%		0.02	100%	100%		100%	100%	50	45%	100%	2
Employee		1.80	100%	100%		0.18	100%	100%		100%	100%	450	100%	100%	45
Audience Sound Stage	100,000 sf GFA	3.60	100%	100%		4.05	100%	100%		15%	100%	54	0%	100%	—
Employee		1.80	100%	100%		1.80	100%	100%		100%	100%	180	0%	100%	—
Production Support	104,000 sf GFA	0.10	100%	100%		0.01	100%	100%		100%	100%	11	45%	100%	1
Employee		0.90	100%	100%		0.21	100%	100%		100%	100%	94	100%	100%	22
Customer/Visitor												548			175
Employee/Resident												4,344			825
Reserved												189			189
Total												5,081			1,188
Shared Parking Reduction												6%			33%
<div><div></div><div><div>emp = employees</div><div>ksf GFA = thousand square feet gross floor area</div><div>ksf GLA = thousand square feet gross leasable area</div><div>sf = square feet</div><div>Source: Gibson Transportation Consulting, Inc., 2023.</div></div></div>															

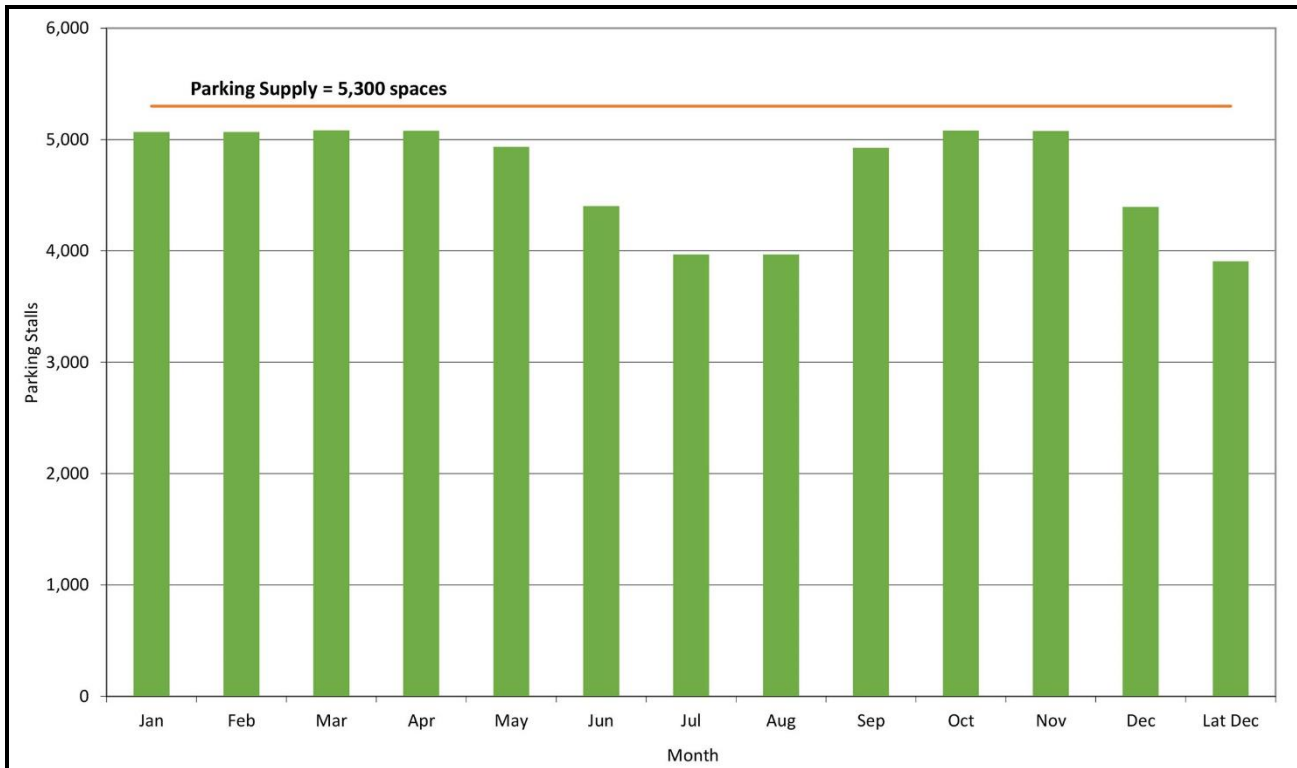
Table II-16
Peak Parking of the Project by Hour: March—Weekday Estimated Peak-Hour Parking Demand

Land Use	Monthly Adjustment	6 A.M.	7 A.M.	8 A.M.	9 A.M.	10 A.M.	11 A.M.	12 P.M.	1 P.M.	2 P.M.	3 P.M.	4 P.M.	5 P.M.	6 P.M.	7 P.M.	8 P.M.	9 P.M.	10 P.M.	11 P.M.	12 A.M.	Overall Peak 10 A.M.	A.M. Peak Hour 10 A.M.	P.M. Peak Hour 1 P.M.	Eve. Peak Hour 6 P.M.
MARCH—WEEKDAY ESTIMATED PEAK-HOUR PARKING DEMAND																								
Retail																								
Retail/Restaurant	97%	1	7	21	49	83	104	139	139	132	118	118	128	136	121	98	68	23	8	0	83	83	139	136
Employee	97%	4	6	10	17	29	37	39	39	39	39	39	39	39	39	35	23	15	8	0	29	29	39	39
Food and Beverage, Entertainment and Institutions, Hotel and Residential, Office																								
Production Office	100%	0	1	28	84	140	63	21	63	133	63	21	14	7	3	1	0	0	0	0	140	140	63	7
Reserved	100%	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84
Employee	100%	479	798	1,436	1,596	1,596	1,596	1,357	1,357	1,277	1,277	1,117	798	399	239	80	48	16	0	0	1,596	1,596	1,357	399
General Office	100%	0	2	42	126	210	95	32	95	200	95	32	21	11	4	2	0	0	0	0	210	210	95	11
Reserved	100%	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105
Employee	100%	599	998	1,796	1,995	1,995	1,995	1,696	1,696	1,596	1,596	1,397	998	499	299	100	60	20	0	0	1,995	1,995	1,696	499
Additional Land Uses																								
Sound Stage	100%	0	1	10	30	50	23	8	23	48	23	8	5	3	1	1	0	0	0	0	50	50	23	3
Employee	100%	135	225	405	450	450	450	383	383	360	360	315	225	113	68	23	14	5	0	0	450	450	383	113
Audience Sound Stage	100%	0	54	54	54	54	54	119	119	119	119	119	119	360	360	360	360	360	0	0	54	54	119	360
Employee	100%	54	90	162	180	180	180	180	180	180	180	180	180	180	180	180	180	90	0	0	180	180	180	180
Production Support	100%	0	0	2	7	11	5	2	5	10	5	2	1	1	0	0	0	0	0	0	11	11	5	1
Employee	100%	28	47	85	94	94	94	80	80	75	75	66	47	24	14	5	3	1	0	0	94	94	80	24
Customer/Visitor		1	65	157	349	548	343	319	443	641	422	299	288	516	489	462	428	383	8	0	548	548	443	516
Employee/Resident		1,298	2,163	3,893	4,332	4,344	4,352	3,733	3,733	3,527	3,527	3,113	2,286	1,252	839	422	327	147	8	0	4,344	4,344	3,733	1,252
Reserved		189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189
		1,489	2,417	4,239	4,871	5,081	4,884	4,242	4,365	4,357	4,138	3,601	2,763	1,958	1,517	1,073	944	718	204	189	5,081	5,081	4,365	1,958

Table II-16 (Continued)
Peak Parking of the Project by Hour: March—Weekday Estimated Peak-Hour Parking Demand

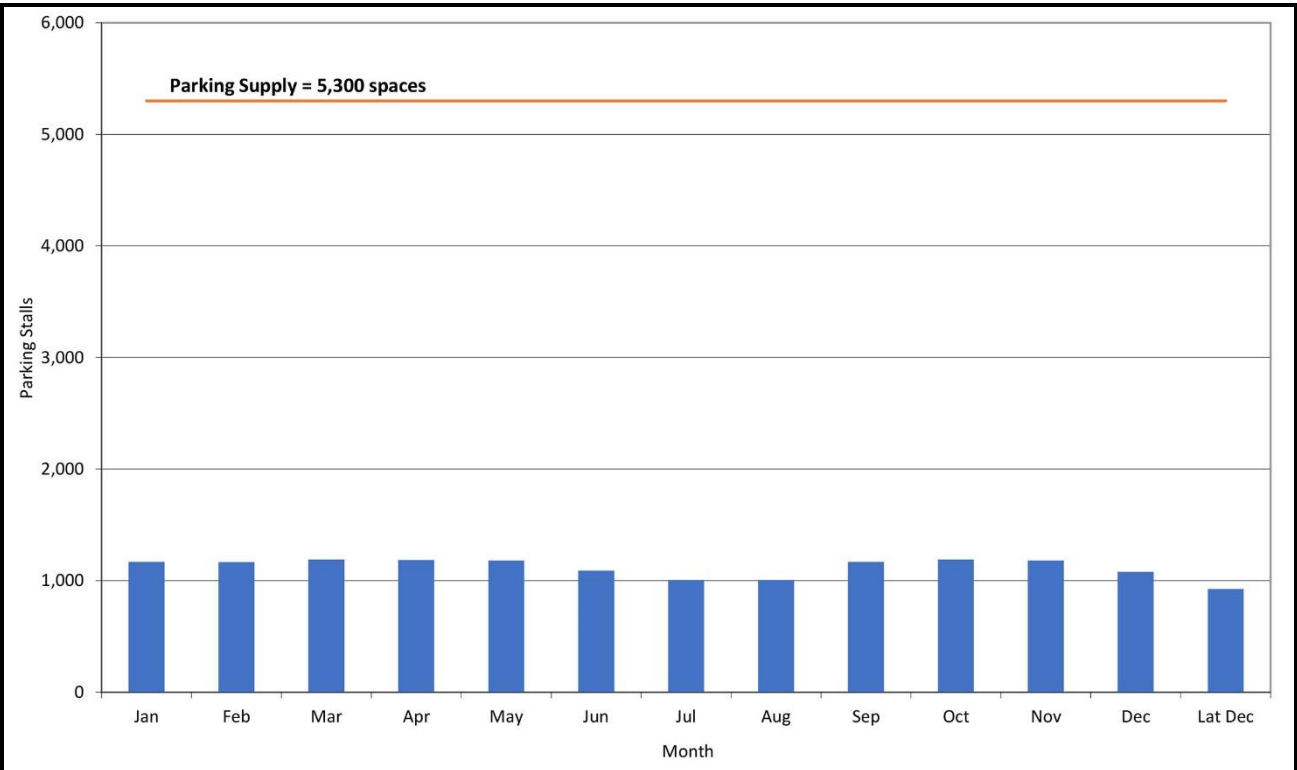
Land Use	Monthly Adjustment	6 A.M.	7 A.M.	8 A.M.	9 A.M.	10 A.M.	11 A.M.	12 P.M.	1 P.M.	2 P.M.	3 P.M.	4 P.M.	5 P.M.	6 P.M.	7 P.M.	8 P.M.	9 P.M.	10 P.M.	11 P.M.	12 A.M.	Overall Peak 11 A.M.	A.M. Peak Hour 11 A.M.	P.M. Peak Hour 12 P.M.	Eve. Peak Hour 6 P.M.
MARCH—WEEKEND ESTIMATED PEAK-HOUR PARKING DEMAND																								
Retail																								
Retail/Restaurant	97%	2	8	46	76	106	137	144	152	152	144	137	124	116	108	100	77	46	15	0	137	137	144	116
Employee	97%	4	6	15	29	33	37	39	39	39	39	39	37	33	31	29	25	17	6	0	37	37	39	33
Food and Beverage, Entertainment and Institutions, Hotel and Residential, Office																								
Production Office	100%	0	3	8	11	13	14	13	11	8	6	3	1	1	0	0	0	0	0	0	14	14	13	1
Reserved	100%	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84	84
Employee	100%	0	53	160	213	239	266	239	213	160	106	53	27	13	0	0	0	0	0	0	266	266	239	13
General Office	100%	0	4	13	17	19	21	19	17	13	8	4	2	1	0	0	0	0	0	0	21	21	19	1
Reserved	100%	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105
Employee	100%	0	91	273	364	410	455	410	364	273	182	91	46	23	0	0	0	0	0	0	455	455	410	23
Additional Land Uses																								
Sound Stage	100%	0	0	1	3	5	2	1	2	5	2	1	1	0	0	0	0	0	0	0	2	2	1	0
Employee	100%	14	23	41	45	45	45	38	38	36	36	32	23	11	7	2	1	0	0	0	45	45	38	11
Audience Sound Stage	100%	0	0	0	0	0	0	0	0	0	0	0	405	405	405	405	405	405	0	0	0	0	0	405
Employee	100%	0	0	0	0	0	0	0	0	0	0	90	180	180	180	180	180	90	0	0	0	0	0	180
Production Support	100%	0	0	0	1	2	1	0	1	2	1	0	0	0	0	0	0	0	0	0	1	1	0	0
Employee	100%	7	11	20	22	22	22	19	19	18	18	15	11	6	3	1	1	0	0	0	22	22	19	6
Customer/Visitor		2	15	68	108	145	175	177	183	179	161	145	533	523	513	505	482	451	15	0	175	175	177	523
Employee/Resident		24	183	508	673	749	825	745	672	525	381	320	322	266	221	212	207	108	6	0	825	825	745	266
Reserved		189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189	189
		214	387	765	970	1,082	1,188	1,110	1,044	893	731	653	1,044	978	923	907	878	748	210	189	1,188	1,188	1,110	978
Source: Gibson Transportation Consulting, Inc., 2023.																								

Table II-17
Weekday Month-by-Month Estimated Parking Demand



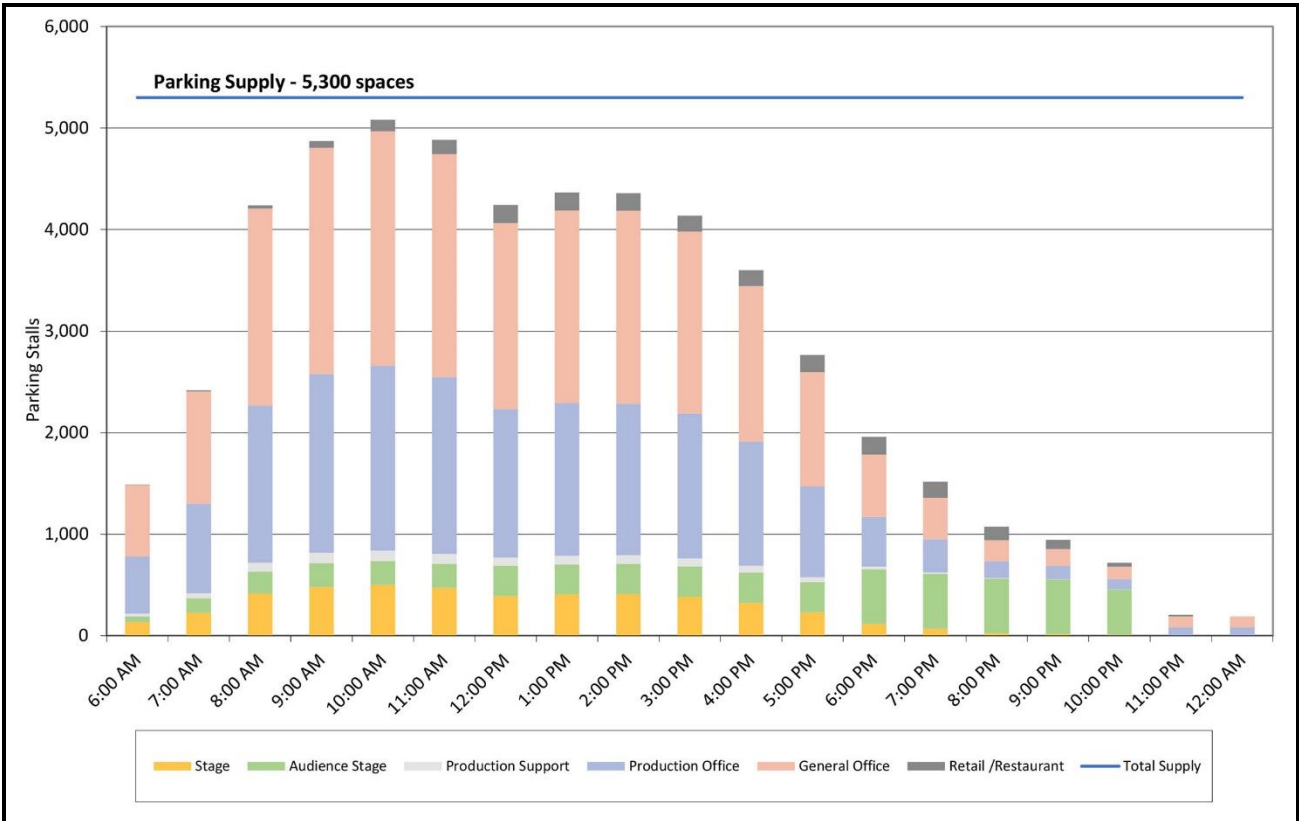
Source: Gibson Transportation Consulting, Inc., 2023.

Table II-18
Weekend Month-by-Month Estimated Parking Demand



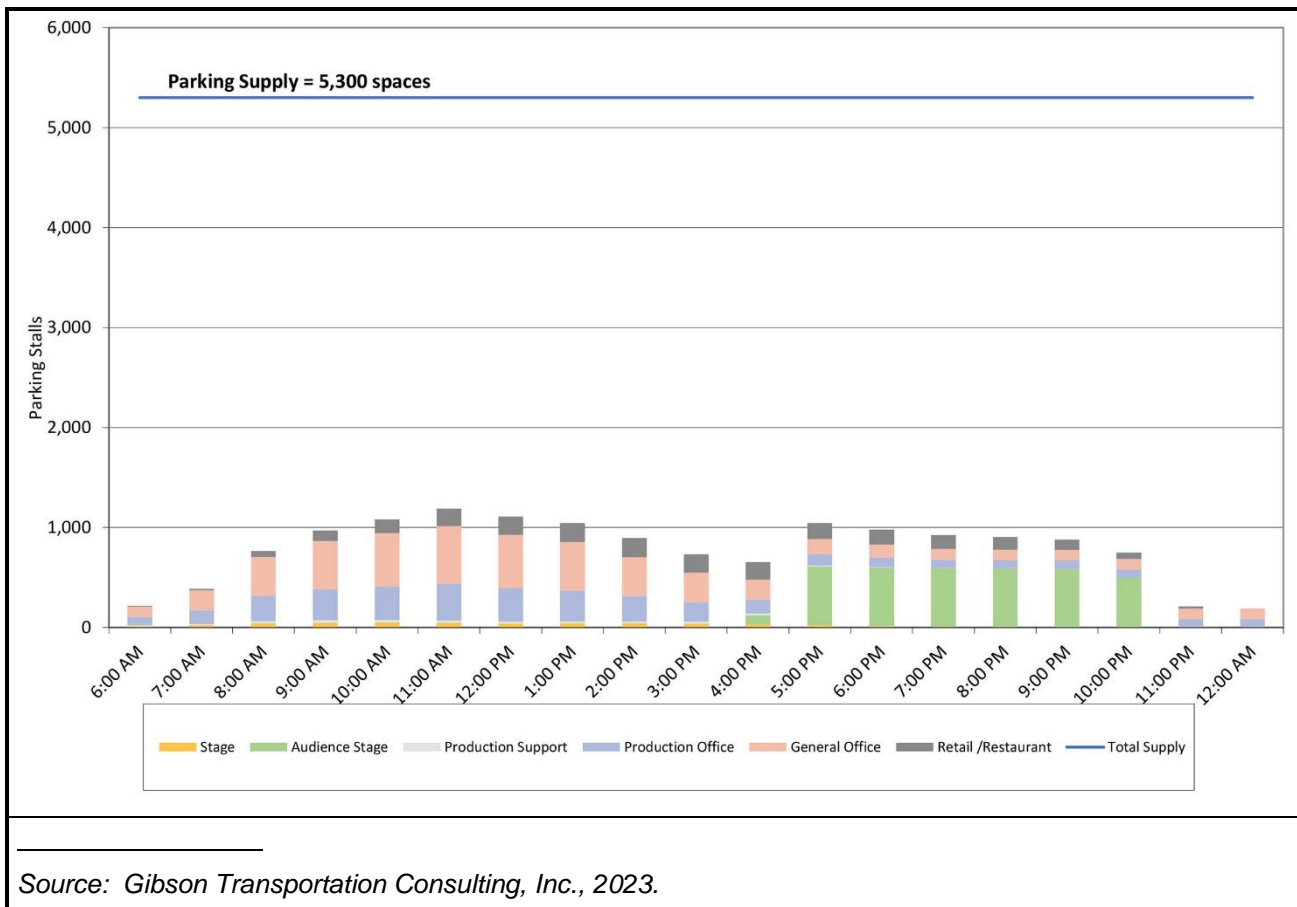
Source: Gibson Transportation Consulting, Inc., 2023.

Table II-19
Peak Month Daily Parking Demand by Hour (Weekday)



Source: Gibson Transportation Consulting, Inc., 2023.

Table II-20
Peak Month Daily Parking Demand by Hour (Weekend)



B. Off-Site Parking

Commenters expressed concern regarding a potential off-site parking program by the Project and the possibility of an agreement with the City regarding off-site parking. These comments are referring to the statement on page IV.K-44 in Section IV.K, Transportation, of the Draft EIR that parking may be located off-site upon submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning.

As discussed above, pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. As described in Section A of this Topical Response, the Project would construct sufficient on-site parking to accommodate the peak parking demand of the Project. Therefore, this on-site parking supply would be sufficient to serve visitor and audience parking.

Thus, the Project is not required to, nor does it intend to implement, an off-site parking program or negotiate an agreement with the City regarding off-site parking. The Project does not need off-site parking to meet its peak parking demands and therefore is not proposing such a program. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language referenced above was deleted from the Draft EIR.

One of the elements of the Project's NTMP, which would be developed with the participation of neighbors as discussed in Topical Response No. 9, Neighborhood Traffic Management Plan, would be the consideration of parking controls to prohibit and control Project parking within the neighborhoods. If desired by the neighbors and approved by the neighbors and LADOT, a residential parking permit system could be implemented (or modified) to keep non-resident parking out of the neighborhoods. Residential vehicle passes, time of day restrictions, time duration limits, and other techniques could be evaluated as part of the NTMP to control non-residential parking. Parking fines and even tow-away actions for repeat offenders could also be evaluated as part of the NTMP, if so desired by the neighbors.

C. Parking Spillover into the Adjacent Neighborhoods and Properties

As discussed above in Section A, Parking Supply, of this Topical Response, the Project would provide convenient and sufficient on-site parking to its employees and visitors to meet its peak demand. Project employees and visitors would be provided temporary or long-term parking credentials. Audience members would be pre-screened and provided with access to parking facilities for the duration of their visit to the Project. Retail customers would be provided a time-limited grace period, and would require further validation or provision of an additional fee beyond the initial time period. Accordingly, there would be no reason for employees or visitors to seek parking in the adjacent residential neighborhoods or within adjacent properties.

Comment letters cited current spillover parking occurring in the residential neighborhoods; however, the commenters do not provide any substantial evidence that the current spillover parking occurs due to employees and visitors to the Project Site.

In the unlikely event that the Project employees and/or visitors seek outside parking, there are measures available to protect the adjacent properties. The Grove and The Original Farmers Market currently charge for parking and use an escalating fee structure to discourage long-term parking. Studio employees or visitors who choose to park in the commercial properties to the south would face a high charge for daily parking which could be adjusted upward by The Grove and The Original Farmers Market to further discourage possible parking by Project Site employees or visitors. In the case of the residential

neighborhoods, elimination of long-term parking can most easily be accommodated by the institution of a residential parking permit district whereby only local residents and their guests are allowed to park on the public streets within a parking district. Sometimes the non-permit parking is restricted to specific hours of the day. The neighborhoods to the north and west of the Project Site already have residential parking permit systems. Under the NTMP that is proposed as a condition of approval for the Project, this system could be further evaluated and expanded with neighborhood input. Strategies that could assist in addressing neighborhood concerns include modifying the time limits or the process for obtaining a permit, maintaining consistent enforcement, and/or making the permit system more effective.

In summary, the provision of a convenient and sufficient parking supply on the Project Site, available to all employees and visitors, in addition to the bolstering of neighborhood parking restrictions are the most effective safeguards to prevent spillover parking. Therefore, spillover parking into the adjacent residential neighborhoods and commercial properties is not anticipated.

As discussed above, this Topical Response has been prepared for informational purposes only and is not the basis of determining or mitigating environmental impacts under CEQA because the adequacy of a new project's parking supply is not a CEQA issue.

Topical Response No. 14. Construction Vehicle Impacts

Comments were received regarding construction vehicles and potential construction traffic impacts associated with the Project. These comments focused primarily on the amount of trips that would be generated by construction activities and how such trips were accounted for in the Draft EIR, potential impacts to emergency access due to construction activities, and the sufficiency of Project Design Feature TR-PDF-1 (the development of a Construction Traffic Management Plan [CTMP]). Refer to Appendix FEIR-8, Details of Buildout and Construction, for a detailed summary of construction assumptions, including construction hours, construction equipment, and duration of construction, that were used in the impact analyses within the Draft EIR. As discussed in Section IV.K, Transportation, of the Draft EIR, transportation impacts were comprehensively analyzed and determined to be less than significant during construction of the Project.

Construction Trip Generation

Comments claimed that the Draft EIR did not provide sufficient information about the number of truck trips and other trips during construction. However, truck trips by construction phase were discussed in detail in Table IV.I-11 of the Draft EIR, and worker trips were described in the Transportation Assessment (Appendix M.1 of the Draft EIR). Specifically, as discussed on pages 179 through 182 of the Transportation Assessment, the two busiest construction subphases associated with daily construction activity include:

1. The excavation/foundation subphase, which would result in the most daily truck activity due to the export of up to approximately 772,000 cubic yards of fill material to construct foundations and subterranean parking structures; and
2. The building finishes (also referred to as architectural coating/finishing) subphase, which would require the most on-site workers.

As stated on page IV.I-41 and Table IV.I-11 on page IV.I-42 in Section IV.I, Noise, of the Draft EIR, the excavation/foundation subphase is anticipated to include up to approximately 640 total truck trips per day (320 truck trips in and 320 truck trips out of the Project Site), including 300 haul trucks and 20 delivery trucks, resulting in up to approximately 107 truck trips per hour on average, as shown in Table IV.I-11 of the Draft

EIR. This subphase would include up to approximately 245 workers on-site on the busiest day.⁹⁰

The building finishes subphase would include up to approximately 60 daily delivery truck trips (30 in, 30 out) and up to 970 on-site workers on the busiest day.⁹¹

In addition to the subphases described above, there would be approximately five total days following excavation and grading during which concrete would be poured for the mat foundations. On these days, there would be approximately 1,000 concrete delivery truck trips per day (500 in, 500 out) along with up to 50 on-site workers.⁹²

Typically, on-site workers would arrive early in the morning (typically before 7:00 A.M.) and depart early in the afternoon (typically before 4:00 P.M.). Hauling and delivery activities are permitted between the hours of 9:00 A.M. and 3:30 P.M., and could occur between the hours of 7:00 A.M. and 4:00 P.M. on weekdays and between 8:00 A.M. and 4:00 P.M. on Saturdays with additional approvals from the Bureau of Engineering District Engineer. For further information, refer to the LADOT Haul Route Approval Letter provided in Appendix M.5 of the Draft EIR.

The number of trips generated by these activities is substantially lower than the trips currently generated by day-to-day activities at the Project Site, both when considering daily trips and peak hour trips. As shown in Table II-21 on page II-195 and on Table 13 of the Transportation Assessment (Appendix M.1 of the Draft EIR), the Project Site currently generates approximately 3,721 daily trips, including approximately 410 morning peak hour trips and approximately 421 afternoon peak hour trips. A total of approximately 80 of those daily trips are truck trips (approximately 40 in and 40 out) as shown in Table II-7 of Topical Response No. 10, Trip Generation. While many of the daily trips generated by construction activities would be truck trips, they would be spread out throughout the approved hauling

⁹⁰ See Draft EIR Appendix B, pdf page 32 (CalEEMod Output Files, Section 3.0 Construction Detail). Note that page 181 of Transportation Assessment provided in Appendix M.1 of the Draft EIR has been revised to reflect 245 construction workers on-site instead of 295 construction workers on-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

⁹¹ The number of delivery trucks during the building finishes phase is included on pdf page 32 of Appendix B of the Draft EIR (CalEEMod Output Files, Section 3.0 Construction Detail). Note that the number of construction workers is 970 (not 740). This updated number is included in the updated air quality model runs included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments provided in Appendix FEIR-9. Thus, this updated number does not change any of the significance conclusions in the air quality analysis or any other analyses in the Draft EIR.

⁹² The number of concrete delivery trucks and workers is included in Table IV.I-11 of Section IV.I, Noise, of the Draft EIR and on pdf page 32 of Appendix B of the Draft EIR (CalEEMod Output Files, Section 3.0 Construction Detail).

Table II-21
Maximum Construction Subphase Trip Generation Compared to Operation

Description	Estimated Trips		
	Daily	A.M. Peak Hour	P.M. Peak Hour
Operational Project Site Trips^a			
<i>Gross upon Project Completion</i>	13,454	1,197	1,276
<i>Existing without Project</i>	3,721	410	421
<i>Net New (Difference between Gross and Existing)</i>	9,733	787	855
Construction Subphase Trips^b			
A. Demolition			
<i>Truck Trips^c</i>	80	10	10
<i>Worker Trips^d</i>	100	10	20
Total Construction Trips for Subphase A	180	20	30
B. Grading/Excavation			
<i>Truck Trips^c</i>	640	107	107
<i>Worker Trips^d</i>	490	49	98
Total Construction Trips for Subphase B	1,130	156	205
C. Mat Foundation			
<i>Truck Trips^c</i>	1,000	50	50
<i>Worker Trips^d</i>	100	10	20
Total Construction Trips for Subphase C	1,100	60	70
D. Structure/Enclosure			
<i>Truck Trips^c</i>	100	13	13
<i>Worker Trips^d</i>	1,350	135	270
Total Construction Trips for Subphase D	1,450	148	283
E. Architectural Coating/Finishing			
<i>Truck Trips^c</i>	60	8	8
<i>Worker Trips^{d, e}</i>	1,840	184	368
Total Construction Trips for Subphase E	1,900	192	376
F. Paving/Landscape			
<i>Truck Trips^c</i>	10	2	2
<i>Worker Trips^d</i>	100	10	20
Total Construction Trips for Subphase F	110	12	22
^a Trip generation estimates are from Tables 6, 7, and 13 in the Transportation Assessment (Appendix M.1 of the Draft EIR). ^b Trip generation estimates are from Appendix B of the Draft EIR. Assumes single-phase construction over a period of 32 months. ^c Construction truck trips by subphase (daily and hourly) are from Table IV.I-11 in Section IV.I, Noise, of the Draft EIR. Note that hourly truck trips may not occur during peak commuter hours; however, they were conservatively assumed to occur for the purposes of this analysis. ^d Construction worker trips by subphase (daily only) are from pages 30–32 of Appendix B of the Draft EIR (CalEEMod Output Files, Section 3.0 Construction Detail). Peak-hour trips are conservatively			

Table II-21 (Continued)
Maximum Construction Subphase Trip Generation Compared to Operation

Description	Estimated Trips		
	Daily	A.M. Peak Hour	P.M. Peak Hour
<i>assumed to be: (a) 10 percent of daily total (20 percent of inbound total) during the morning peak hour (most workers arrive prior to 7:00 A.M.); and (b) 20 percent of the daily total (40 percent of the outbound total) during the afternoon peak hour (most workers depart by 4:00 P.M.).</i> ^e <i>Note that the architectural coatings/finishes workers was inadvertently input into CalEEMod as 740 instead of 920. This is corrected here and in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.</i> <i>Source: Gibson Transportation Consulting, Inc., 2023.</i>			

and delivery window, and therefore would have a limited effect on peak hour operating conditions.

During the potential 32-month construction period of a single-phase development, the Project Site would not be operational, and, therefore, the approximately 3,721 daily trips generated by the existing land uses on-site, as summarized in Table II-21 on page II-195, would not occur. Accordingly, trip volumes during each subphase of Project construction would range between approximately 110 and 1,900 and would be lower than the existing operational trips. Certain of the construction subphases shown in Table II-21 may overlap in a limited fashion, such as paving and landscaping occurring simultaneously with architectural coatings and finishings. However, under no condition would all construction subphases occur simultaneously.

In the long-term buildout scenario in which the Project Site were developed in phases, or phased development, there would be periods with operational trips and construction trips occurring at the same time. For example, an initial phase of development of the Project could consist of the construction of the parking structure in the southeast corner of the Project Site, an area which currently primarily houses production support uses that generate relatively less operational activity. Thus, the majority of the existing Project Site operations could continue uninterrupted during construction, potentially resulting in more trips to and from the Project Site than under existing conditions. Similarly, after one or more Project development phases are completed, a portion of the Project would be operational, and subsequent phases of development and their associated construction would occur alongside those new Project Site operations. In either of these scenarios, however, the total trips to and from the Project Site (including operational trips and construction trips) would be less than the proposed Project at full buildout. This is both because phased development would result in less construction trips than single-phase development (simultaneous construction Project Site-wide) and because construction trip

activity is generally less intensive than the operational trips once the construction phase is completed.

Therefore, under either development scenario (single or multi-phase construction), Project Site trip generation during construction would be less than the Project when fully operational, and thus would have a lesser effect on traffic than the Project as analyzed in the Transportation Assessment and the Draft EIR.

Construction VMT

Comments stated that transportation impacts associated with construction activities, particularly haul and concrete trucks, were not analyzed. As set forth on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, based on the updated CEQA Guidelines, transportation impacts shall be evaluated based on VMT rather than LOS or any other measure of a project's effect on automobile delay. Furthermore, CEQA does not require a VMT analysis of construction traffic; CEQA Guidelines Section 15064.3, subdivision (b) notes, "for many projects, a qualitative analysis of construction traffic may be appropriate." The City does not require an analysis—quantitative or qualitative—of VMT impacts during construction based on the TAG. Regardless, the qualitative analysis conducted in Section 5D of the Transportation Assessment and the trips shown in Table II-21 on page II-195 demonstrate that there would be fewer trips to and from the Project Site during construction than currently generated on the Project Site. Though construction trips may, on average, be longer than those generated by Project Site employees, given how many fewer construction trips there would be, they would generate fewer overall VMT than the proposed Project land uses. Note that the subphases would not occur all at once, and therefore the maximum trips generated by subphase would not be cumulative in nature.

Emergency Access

As described in the Draft EIR, construction activities would primarily be contained within the Project Site, including on-site staging of construction equipment and vehicles. Nonetheless, limited off-site construction activities, such as utility connection, curb reconstruction, and signal and striping upgrades, may occur within adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. As described on page IV.K-80 of the Draft EIR, these activities would be conducted in accordance with the Project's CTMP, which would require the posting of street closure information, detour plans, haul routes, and staging plans, subject to review by LADOT and the Los Angeles Bureau of Street Services prior to commencing construction. Such lane closures would be temporary and at no time would full closure of any street be required. Therefore, two-way vehicular access would be maintained on all streets at all times during construction, allowing the continuous and unimpeded passage of emergency vehicles. Temporary construction-related lane closures are common in urban

environments such as the Project vicinity, and emergency response personnel are experienced at navigating such conditions on a regular basis. Additionally, pursuant to CVC Section 21806, all vehicles are required to yield to emergency vehicles and pull to the side of the road, thereby allowing emergency vehicles to pass unimpeded. The Project's effects on emergency access are further described in Section C, Emergency Access, of Topical Response No. 12, Safety and Congestion.

Safety

Comments express concerns about pedestrian and bicycle safety during Project construction. As discussed below, Project construction would be subject to the conditions of the CTMP, which would include specific measures to promote pedestrian and bicycle safety, including the implementation of alternative routing, protective barriers and temporary traffic controls designed for pedestrian and bicycle safety. With such measures in place, Project construction would not result in unsafe conditions for pedestrians and bicycles on the adjacent streets and sidewalks.

Additionally, Topical Response No. 12, Safety and Congestion, provides a more detailed discussion of safety and congestion. As summarized above, Project construction would generate less daily and peak hour traffic than existing Project Site operations, and therefore would have less effect on congestion than existing Project operations.

Construction Traffic Management Plan

Comments claim that the CTMP under Project Design Feature TR-PDF-1 represents an inappropriate deferral of critical information needed in the Draft EIR for environmental review by the public. However, the major elements of the CTMP—including many of the specific conditions limiting the effects of Project construction on surrounding neighborhoods—were identified in the Draft EIR as Project Design Feature TR-PDF-1. As discussed above, transportation impacts were comprehensively analyzed and determined to be less than significant during construction of the Project, and, therefore, no mitigation measures are required under CEQA. The analysis included in the Draft EIR and Transportation Assessment is consistent with the TAG and LADOT policies regarding the preparation of an CTMP associated with a proposed development project in the City of Los Angeles. As discussed on pages IV.K-36 and IV.K-37 in Section IV.K, Transportation, of the Draft EIR, Project Design Feature TR-PDF-1 would require the Applicant to prepare and submit a detailed CTMP to the City for review and approval prior to commencing construction. The CTMP would include street closure information, a detour plan, haul routes, and a staging plan. The CTMP will formalize how Project construction will be carried out and identify specific actions that will reduce traffic-related effects on the surrounding community. City staff, including staff from LADOT and the Department of

Building and Safety, have oversight authority in the preparation, review, implementation, and monitoring of the CTMP.

Haul Routes

Comments claimed that construction truck haul routes would result in hazards and other impacts to nearby uses, including transportation, noise, and air quality impacts. As discussed on pages II-34 to II-35 in Section II, Project Description, of the Draft EIR, the Project has identified three haul route options for exporting excavated materials and delivery truck routes. In each case, the routes are defined between the Project Site and the Santa Monica Freeway (I-10), from which the trucks could access other freeways in the regional transportation network. These haul route options include use of Fairfax Avenue and the Washington Boulevard interchange to and from I-10; use of Fairfax Avenue, San Vicente Boulevard, and La Brea Avenue to and from I-10; and use of Beverly Boulevard and La Brea Avenue to and from I-10. The haul routes are described in full in Appendix FEIR-8, Details of Buildout and Construction.

These proposed haul routes have been reviewed and approved by LADOT (refer to Appendix M.5 of the Draft EIR). The haul route and associated construction activities would adhere to the Project's conditions of approval and, prior to construction, would be required to obtain permit clearance by the Department of City Planning and LADOT. Typical of construction in an urban area, these routes pass sensitive land uses (e.g., schools and residential neighborhoods). The noise and air quality effects of the construction truck trips on these sensitive uses have been fully studied in the Draft EIR. Specifically, Section IV.I, Noise, of the Draft EIR concluded that off-site construction noise impacts associated with the use of haul trucks would be significant along the haul route segment of Fairfax Avenue and that potential impacts from the haul trucks along the other segments of the haul routes would be less than significant (refer to pages IV.I-40 through IV.I-43 of Section IV.I, Noise, of the Draft EIR). Section IV.I, Noise, of the Draft EIR also concluded that potential vibration impacts associated with building damage along the haul routes would be less than significant and that potential vibration impacts associated with human annoyance at the residential and motel uses along Fairfax Avenue, Beverly Boulevard, La Brea Avenue, San Vicente Boulevard, Normandie Avenue, and Vermont Avenue would be significant and unavoidable (refer to pages IV.I-63 through IV.I-65 of Section IV.I, Noise, of the Draft EIR). With regard to localized air quality impacts associated with use of the haul trucks, Section IV.A, Air Quality, of the Draft EIR concluded that with implementation of Mitigation Measure AIR-MM-2 (which requires the use of 2010 model year or newer engines that meet CARB's 2010 engine emission standards for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours), peak localized air quality impacts associated with haul truck activities would be less than significant (refer to pages IV.A-66 and IV.A-74 of Section IV.A, Air Quality, of the Draft EIR).

Topical Response No. 15. Transportation Improvement Program

Commenters expressed confusion in regard to the specific improvements that are included in the Project's Transportation Improvement Program. The Transportation Improvement Program includes the TDM Program, which is discussed in detail in Topical Response No. 11, Transportation Demand Management, as well as a number of other transportation improvements discussed below.

The Transportation Assessment, included as Appendix M.1 of the Draft EIR, discusses the Transportation Improvement Program on pages 186–189. The list of transportation improvements is summarized in Table 23 on page 190, and the implementation schedule is included on page 191 of the Transportation Assessment. This information is repeated here in Table II-22 on page II-201.

These improvements were developed as a result of the non-CEQA analysis required by LADOT. The Project would not result in any significant transportation impacts under CEQA, and therefore no CEQA mitigation is required of the Project. The transportation improvements listed in Table II-22 are listed as non-CEQA Project requirements in the LADOT Assessment Letter dated November 16, 2021 (Appendix M.2 of the Draft EIR).

Table II-22
Proposed Project Transportation Improvement Program

Transportation Improvements	Improvement Cost
Project Features^a	
Estimated Mobility Hub Construction Costs	\$50,000,000
Project-Adjacent Reconstruction and Improvement Costs ^b	\$4,000,000
Estimated Annual Transportation Demand Management (TDM) Operating Costs	\$2,000,000
Total Project Contribution	\$54,000,000 one-time \$2,000,000 annually
Off-Site Improvements	
Vision Zero Safety Improvements	\$130,000
Transportation Systems Management (TSM)	\$1,340,000
Traffic Signal Upgrades/Left-Turn Signal Phasing	\$400,000
Neighborhood Traffic Management Plan (NTMP) and Bicycle Improvements	\$250,000
Total Project Contribution	\$2,120,000 one-time
Overall Total Project Contribution	\$56,120,000 one-time \$2,000,000 annually
<p>^a Cost estimates prepared by the Applicant for installation and operation of transportation-related Project features and off-site improvements.</p> <p>^b Includes reconstruction and improvements to the sidewalks, transit stops, and landscaping adjacent to the Project Site as well as installation of new traffic signals at Project access points on Fairfax Avenue and The Grove Drive.</p> <p>Source: Gibson Transportation Consulting, Inc., 2023.</p>	

Topical Response No. 16. Project Alternatives Analysis

Commenters questioned the overall adequacy of the alternatives analysis, the Project objectives, and the analysis of alternatives compared to the Project, while they expressed support for greater consideration of the alternatives, including Alternative 2 and Alternative 5, and requested the consideration of additional alternatives, such as Project alternatives that are located on a different site, provide housing, and/or include alternative circulation and parking plans.

Alternatives Analysis Fully Complies with CEQA Requirements

The alternatives analysis included in Section V, Alternatives, of the Draft EIR fully complies with CEQA. As set forth in Section V, Alternatives, the analysis of alternatives was guided by CEQA Guidelines Section 15126.6(a), which states:

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

There are no requirements governing the nature or scope of the “reasonable range” of alternatives to be discussed, other than the “rule of reason” (CEQA Guidelines Section 15126.6(a) & (f)). What constitutes a “reasonable range” of alternatives will vary with the facts of each project and should be guided only by the purpose of offering substantial environmental advantages over the project proposal which may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved (PRC Sections 21002, 21061.1; CEQA Guidelines Section 15364).

Based on the detailed analyses in Section IV, Environmental Impact Analysis, of the Draft EIR, the Project would result in temporary significant impacts during construction in two environmental categories: (1) air quality and (2) noise and vibration. Specifically, Project construction would result in significant and unavoidable Project-level impacts with respect to regional emissions of nitrogen oxides (NOx) and on- and off-site noise and vibration (human annoyance). Cumulative impacts associated with regional construction-related NOx emissions, on- and off-site noise during construction, and off-site vibration (human annoyance) during construction would also be significant and unavoidable. In

addition, Project-level and cumulative impacts associated with regional emissions of NO_x and volatile organic compounds (VOC) would be significant and unavoidable under a potential long-term buildout scenario due to concurrent construction and operation of the Project.

Section V, Alternatives, of the Draft EIR considered several alternatives to substantially reduce or avoid the significant construction noise and vibration impacts at receptor location R1 (Broadcast Center Apartments), and these alternatives were rejected as infeasible, as discussed further below. In accordance with the CEQA Guidelines, a reasonable range of potentially feasible alternatives were selected to address the significant impacts while also considering the Project objectives included in Section II, Project Description, of the Draft EIR. The selection of Project alternatives also necessarily took into consideration the physical development constraints on the Project Site due to the existing Historic-Cultural Monument (HCM) on-site. The original Primary Studio Complex, which is located generally in the center of the Project Site and includes two attached buildings (the Service Building on the east and the Studio Building on the west), was designated- as HCM No. 1167 on June 26, 2018 (CHC-2018-476-HCM).⁹³ In accordance with the CEQA Guidelines, the following alternatives were selected for analysis:

- **Alternative 1—No Project/No Build Alternative:** Under Alternative 1, the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environmental setting would be maintained.
- **Alternative 2—Development in Accordance with Existing Zoning Alternative:** Alternative 2 would involve buildout of the Project Site in accordance with the existing zoning and land use regulations for the Project Site. Alternative 2 would include the construction of an estimated 856,986 square feet of new studio-related general office uses and the retention of an estimated 743,680 square feet of existing development with a FAR of 1.49:1. No demolition would occur under Alternative 2. New development would include a 15-story office building (maximum height of 203 feet above Project Grade⁹⁴) with four levels of subterranean parking and three levels of above-ground parking, and a six-level parking structure, with two levels of subterranean parking, and a maximum height of 66 feet. Alternative 2 would require approximately 315,000 cubic yards of export.

⁹³ Refer to Section IV.B, Cultural Resources, of the Draft EIR for a detailed discussion of the Primary Studio Complex.

⁹⁴ Project Grade is defined as 201 feet AMSL, consistent with the method used to measure building height for the Project. Refer to Figure II-3(c) which has been added to Section II, Project Description, in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

- Alternative 3—Reduced Density Alternative:** Alternative 3 would involve a 20-percent reduction in the Project’s proposed development program. Alternative 3 consists of the same general site plan as the Project but with certain reduced building heights and square footages. Alternative 3 would include a total of an estimated 1,499,200 square feet of development (FAR of 1.4:1), including an estimated 280,000 square feet of sound stages, 83,200 square feet of production support, 560,000 square feet of production office, 560,000 square feet of general office, and 16,000 square feet of retail uses. Alternative 3 would involve the construction of an estimated 1,251,380 square feet of new development, the demolition of 495,860 square feet of existing studio-related uses and the retention of an estimated 247,820 square feet of existing studio-related uses. Alternative 3 would require approximately 772,000 cubic yards of export.
- Alternative 4—Mixed-Use Alternative:** Alternative 4 would involve a mixed-use development with studio, residential, and retail uses. Alternative 4 would be developed in accordance with the existing zoning and land use designations for the Project Site and would seek a maximum FAR of up to 3.75:1 per Transit Oriented Communities (TOC) Tier 3. Alternative 4 would include a total of 3,696,370 square feet of development (FAR of 3.45:1), including approximately 2,772,000 square feet of residential uses (3,680 units within three residential towers, of which 14 percent or 516 units would be affordable units for Very Low-Income households). In addition to residential uses, this alternative would include 36,000 square feet of sound stages, 41,400 square feet of production support, 138,000 square feet of general office uses, and 60,000 square feet of retail uses. The residential towers would be located along the western side of the Project Site, fronting Fairfax Avenue, and would consist of 30 stories over a six-level parking podium (maximum height of 400 feet above Project Grade), with ground floor retail uses and four levels of subterranean parking. New development on the eastern portion of the Project Site would include a six-story office building (maximum height of 90 feet) with two levels of subterranean parking, a four-story production support building (maximum height of 60 feet) connected to two single-story sound stages (maximum height of 60 feet), and a four-level parking structure (maximum height of 45 feet) with three levels of subterranean parking. Alternative 4 would require approximately 505,000 cubic yards of export.
- Alternative 5—Above-Ground Parking Alternative:** Alternative 5 has been designed to eliminate subterranean parking in order to reduce excavation and export. Alternative 5 would include the same development program, square footages, FAR, and general layout as the Project, except that all parking would be located in above-ground structures. As a result, building heights would increase. Alternative 5 would require approximately 154,000 cubic yards of export.

A more detailed description of each of these alternatives is included in Section V, Alternatives, of the Draft EIR. These alternatives represent a reasonable range of alternatives to avoid or substantially lessen the significant impacts of the Project while

focusing on attaining the Project objectives. In addition to the No Project Alternative, these alternatives include a range of different land use types, different land use configurations and densities, and shifting of building heights. Specifically, Alternative 2 represents development in accordance with the existing zoning and land use regulations, with a corresponding reduction in floor area and reduction in the amount of grading and export to address the construction-related impacts of the Project. Alternative 3 represents a further reduction in overall development and parking above grade and an associated overall reduction in above-grade construction activity. Alternative 4 includes a mix of uses, including residential uses, taller buildings oriented along Fairfax Avenue, and a reduced amount of grading and export. Alternative 5 includes the same overall amount of development and uses as the Project but with a substantially reduced amount of grading and export. As such, a reasonable range of alternatives has been considered to address the construction-related impacts of the Project.

In accordance with CEQA Guidelines Section 15126.6(d), an analysis of each of these alternatives compared to the Project is provided for each of the environmental topics evaluated in the Draft EIR. Also, in accordance with CEQA Guidelines Section 15126.6(a), a review of each of the alternative's ability to meet the Project objectives is included for each of the alternatives. As discussed in Section V of the Draft EIR, other than Alternative 1 (No Project Alternative), none of the alternatives would avoid or substantially lessen all of the Project's significant and unavoidable impacts. In addition, Alternative 1 would not achieve the Project's purpose or any of the associated Project objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, Table V-2 on pages V-16 to V-18 and the supporting text on pages V-19 through V-155 in Section V, Alternatives, of the Draft EIR includes an evaluation of the remaining alternatives compared to the Project, and the Draft EIR appropriately concluded that Alternative 5, the Above-Ground Parking Alternative, would be the Environmentally Superior Alternative. Although Alternative 5 would not avoid all of the Project's significant and unavoidable impacts, Alternative 5 would reduce the Project-level and cumulative regional air quality impacts related to NO_x emissions during the overlap of construction and operation from a significant and unavoidable level to a less-than-significant level with mitigation by eliminating subterranean parking, thereby substantially reducing excavation, grading and the export of soil. Alternative 5 would also reduce the Project-level and cumulative air quality impacts related to concurrent construction and operations and would substantially lessen the Project's offsite construction noise impact, although these impacts would remain significant and unavoidable. However, Alternative 5 would not meet a number of the Project's objectives to the same extent as the Project. Alternative 5 would also result in substantially increased building massing on-site due to several multi-level parking podiums needed to accommodate above-ground parking. This increased massing would further contribute to and/or exacerbate non-CEQA issues that have been raised in public comments regarding

the Project's scale; impact of views, light, and shade; building heights; and the pedestrian experience.

In summary, the alternatives analysis considers a reasonable range of alternatives. The alternatives analysis in the Draft EIR is comprehensive and fully complies with CEQA and the purpose of an alternatives analysis.

Project Objectives

In accordance with Section 15124(b) of the CEQA Guidelines, a statement of Project objectives, including the underlying purpose of the Project, is provided on pages II-10 through II-12 of Section II, Project Description, of the Draft EIR. As indicated therein, the underlying purpose of the Project "is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot." The Project's specific objectives address maintaining the Project Site as a studio facility; rehabilitating and preserving historical resources; promoting economic growth; contributing to Los Angeles' status as a creative capital; optimizing an underutilized site; concentrating development and height toward the center of the Project Site; providing adequate access, staging and parking; providing for basecamp areas; providing multi-modal transportation solutions; creating a model for environmental sustainability; providing an architecturally distinct development; and permitting a reasonable return on investment while generating tax and property revenues to the City. These objectives address a range of issues and are not impermissibly narrow.

Furthermore, the Project objectives do not impede the development and evaluation of a reasonable range of alternatives in conformance with the requirements of CEQA. Rather, as discussed above, the Draft EIR includes an analysis of five alternatives to the Project, as well as a discussion of why other alternatives were rejected as infeasible and not subject to additional analysis. In accordance with CEQA Guidelines Section 15126.6 (b), the five alternatives that were evaluated were chosen because they were determined to be potentially capable of avoiding or substantially lessening significant effects of the Project while still accomplishing most of the Project objectives.

Analysis of Alternatives Compared to the Project

As discussed above, Section V, Alternatives, of the Draft EIR provides an analysis of the Project's impacts compared to those of the five alternatives. Several comments regarding the Draft EIR state that the Project's significant impacts are not disclosed and, thus, the alternatives analysis fails to include an adequate analysis of the alternatives compared to the Project. The Project's significant impacts have been fully evaluated and

disclosed in the Draft EIR. Furthermore, as demonstrated by the response to comments in this Final EIR, there are no new significant impacts that were not already disclosed in the Draft EIR. As such, the assertion that the analysis of alternatives in the Draft EIR is inadequate due to significant impacts not being disclosed is unsupported.

Alternatives Considered but Rejected as Infeasible

Section 3 on pages V-11 to V-14 in Section V, Alternatives, of the Draft EIR discusses alternatives that were considered and rejected as infeasible and explains the reasons for their rejection in accordance with CEQA Guidelines Section 15126.6(c). The alternatives that were rejected as infeasible include an alternative site; alternatives that remove or substantially modify the Primary Studio Complex; alternatives that substantially reduce or avoid the temporary significant on-site noise and vibration construction impacts; and a TOC Tier 3 alternative with maximum residential FAR.

Alternative Site

As discussed on pages V-11 to V-12 of the Draft EIR, the objectives of the proposed Project are closely tied to the need to improve existing operations on the Project Site by creating a cohesive and integrated studio campus environment with new technologically advanced facilities. To meet the Project's objective to provide an expandable, flexible, and operationally seamless production ecosystem that is able to respond to evolving market demands, support content creation, and maximize studio production capabilities, the Applicant has identified improvements that are needed to bring the existing studio in line with modern production techniques and trends and to meet the significant and unmet demand for production space in Los Angeles. To this end, a central guiding principle behind the Project is to increase the number of sound stages on-site, combined with an adequate and complementary mix of production support facilities and production offices in order to meet the existing unmet and anticipated future demands of the entertainment industry. This goal is influenced by the inherent challenges posed by the existing development on-site, including the age and layout of the existing facilities, as well as the need to rehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation. Many of the existing production facilities on-site have been developed in an ad hoc manner over the years, resulting in inefficiencies and space constraints. Additionally, several of the existing sound stages on the Project Site are too small and outdated for the needs of the current market and technology.

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

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

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

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

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

Alternatives that Remove or Substantially Modify the Primary Studio Complex

As discussed on page V-13 of the Draft EIR, given that the Primary Studio Complex is designated as an HCM, any alternative that would remove or substantially alter the HCM such that its historic integrity and eligibility would be compromised was rejected as infeasible. Similarly, alternatives that would introduce substantial development within the Viewshed Restoration Area were eliminated from consideration since they would be inconsistent with the HCM designation. Thus, any alternatives that would compromise the HCM were rejected as infeasible.

Alternatives that Avoid the Project's Significant On-Site Construction Noise and Vibration Impacts

As discussed on page V-13 of the Draft EIR, an analysis was performed to determine whether the Project's significant impacts related to on-site construction noise and on-site vibration could be substantially reduced or avoided through an alternative development program. As shown in Table IV.I-10 in Section IV.I, Noise, of the Draft EIR, all stages of Project construction would cause a significant noise impact affecting the adjacent residential use (R1) given its proximity to on-site construction activities. In order to avoid this significant impact, construction activities would need to be moved approximately 700 feet westerly from the Shared Eastern Property Line; in other words, new development could not occur on over half of the Project Site. Accordingly, this alternative was rejected as infeasible.

Another alternative that was considered involved moving construction activities away from the adjacent residential building combined with the use of a tall sound wall. However, if development were moved approximately 100 feet westerly from the Shared Eastern Property Line, a substantial portion of the Project Site could not be developed. Therefore, this alternative was rejected from further consideration. With respect to on-site vibration, as discussed in Section IV.I, Noise, of the Draft EIR and shown in Table IV.I-21 therein, Project construction activities involving a large bulldozer, caisson drilling, jackhammer, or loaded trucks would exceed the vibration threshold with respect to human annoyance at the adjacent residential building (R1). As ground-borne vibration generated by human activities attenuates rapidly with distance from the vibration source, this impact could be reduced to a less-than-significant level by moving construction activities using heavy equipment at least 80 feet westerly from the Shared Eastern Property Line. While the Project's significant and unavoidable vibration impact would be reduced to a less-than-significant level, this alternative would render a substantial portion of the Project Site undevelopable, and a significant construction-related noise impact would continue to occur. As such, this alternative was rejected from further consideration.

An operationally feasible balance of studio uses and carefully planned circulation and basecamp areas are necessary for a functioning studio campus and in order to meet the Project objectives set forth in Section II, Project Description, of the Draft EIR. Sound stages have somewhat fixed dimensions and require adjacent circulation areas to service and support the sound stages. Given that much of the central portion of the Project Site is undevelopable due to the HCM and Viewshed Restoration Area, a 100- or 80-foot setback would render most of the eastern and central portions of the Project Site undevelopable and prevent the Project from providing the requisite mix and distribution of production uses for the studio.

TOC Tier 3 Alternative Use with Maximum FAR

As discussed on page V-14 of the Draft EIR, the Project Site is located in TOC Tier 3, which allows a maximum FAR of 3.75:1. Based on a site area of 1,071,011 square feet, this would allow 4,016,291 square feet of development, including over 4,500 residential units (TOC Tier 3 allows a 70 percent density bonus). The building heights, parking needs, and other space constraints associated with this maximum FAR scenario would yield both building massing and an overall density that would be greater than the surrounding predominantly low- and mid-rise land uses and would result in substantial increases in environmental impacts (e.g., operational air quality impacts, public services and utilities impacts, etc.). Therefore, this alternative was rejected from further consideration.

Suggested Alternatives

While an EIR must describe a range of reasonable alternatives that avoid or reduce a project's significant impacts, it "need not consider every conceivable alternative to a project." (CEQA Guidelines Section 15126.6(a).) CEQA establishes no categorical legal imperative as to the scope of the alternatives to be analyzed in the EIR. Several commenters have suggested that the EIR should include additional alternatives to the Project that are less impactful. As discussed above, the Project's significant impacts are associated with regional air quality, noise and vibration all during construction of the Project. CEQA does not require the City to analyze alternatives proposed by members of the public that are merely variations of alternatives already evaluated in the EIR that would have the same unavoidable effects.

Several commenters suggest that alternative parking and access plans be considered that reduce the use of The Grove Drive. As analyzed in Section IV.K, Transportation, of the Draft EIR, the Project's transportation impacts would be less than significant during construction and operation. As stated in CEQA Guidelines Section 15126.6(f), "alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." As there would be no significant transportation

impacts, consideration of such an alternative is not required under CEQA. Refer to Topical Response No. 12, Safety and Congestion, regarding access along The Grove Drive.

A housing alternative has also been suggested by several commenters. As discussed above, a housing component is included as part of Alternative 4 in the alternatives analysis within the Draft EIR, and another alternative that maximizes residential FAR with TOC Tier 3 was considered and rejected as infeasible. These housing alternatives would not substantially reduce or avoid the significant regional air quality, noise, and vibration impacts associated with construction of the Project as these impacts are based on the amount of excavation and grading and the proximity of construction activities to the sensitive receptors and not on the proposed uses. Likewise, these alternatives would further contribute to and/or exacerbate non-CEQA issues that have been raised in public comments regarding the Project's scale; impact of views, light, and shade; building heights; and pedestrian experience.

Public Support for Specific Alternatives

As discussed above, each of the five alternatives evaluated in Section V, Alternatives, has been given full consideration in the Draft EIR. The EIR will not approve the Project or any of the alternatives. Rather, the City will consider the EIR as part of the decision-making process for the approval of the Project or any of the alternatives. Several commenters support the alternatives evaluated in Section V, Alternatives, of the Draft EIR, including Alternatives 2 and 5. These comments of support for various alternatives within the Draft EIR will be noted for the administrative record and will be forwarded to the decision-makers for consideration prior to any action on the Project.

II. Responses to Comments

D. Comment Letters

Comment Letter No. 1

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Comment No. 1-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the project-level air quality mitigation measures, health risk impacts during operation, and information about South Coast AQMD permits that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the DEIR

Based on the DEIR, the Lead Agency proposes the continuation of an existing studio use and the modernization and expansion of media production facilities within an approximately 25-acre Television City studio¹. The Project is located at 7716–7860 West Beverly Boulevard in Los Angeles². The Proposed Project consists of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, retail uses, associated circulation improvements, parking, landscaping, and open space³. More specifically, the Project includes up to 1,626,180 square feet of new development, the retention of up to 247,280 square feet of existing uses, and the demolition of up to 495,860 square feet of existing media production facilities⁴. Based on a review of aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptor (e.g., residence) is within 25 feet east of the Proposed Project. The Project could take place in one phase over a 32-month period, which could begin in 2023 and end as soon as 2026, or could occur in phases over multiple years⁵. A Development Agreement is sought with a term of 20 years, extending the full buildout year to approximately 2043⁶.

- 1 DEIR. Page II-1.
- 2 *Ibid.*
- 3 *Ibid.*
- 4 *Ibid.*
- 5 *Ibid.* Page II-12
- 6 *Ibid.*

Response to Comment No. 1-1

This comment serves as an introduction to the commenter's letter regarding the Draft EIR for the Project and summarizes the Project Description (Section II, Project Description, of the Draft EIR). Specific comments regarding the Draft EIR are addressed below.

Comment No. 1-2

South Coast AQMD Staff's Comments on the DEIR

Additional Recommended Project-Level Air Quality Mitigation Measures

Based on the DEIR, the Project construction, even with the incorporation of feasible mitigation measures⁷, is expected to result in a significant impact on NOx emissions when compared to the South Coast AQMD Regional Air Quality Significant Thresholds. In addition, Table IV.A-12: Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Mitigated) and Operations shows that regional NOx and VOC would also exceed the South Coast AQMD regional operational significance thresholds⁸. To reduce the construction emissions, the Lead Agency proposes mitigation measures, including the mitigation measure AIR-MM-1, that off-road diesel-powered equipment shall meet the USEPA Tier 4 Final standards⁹. However, as mentioned in the DEIR, the Proposed Project is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043¹⁰. It is reasonably foreseeable that Tier 4 Final might not be the cleanest technology when construction occurs later during the 20-year Development Agreement. According to the California Air Resource Board (CARB) Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027/2028 and the Governor's Executive order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035, wherever feasible¹¹. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the AIR-MM-1 to commit to using the cleanest technology for construction during the Development Agreement period, if available and feasible, and includes the revision in the Final EIR. If the revisions are not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

- ⁷ *Ibid.* Page IV.A-66
- ⁸ *Ibid.* Page IV.A-75,76
- ⁹ *Ibid.* Page IV.A-65.
- ¹⁰ *Ibid.* Page II-12
- ¹¹ Presentation can be found at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf?sfvrsn=8>.

Response to Comment No. 1-2

The Draft EIR concluded in Table IV.A-8, Estimated Maximum Regional Project Daily Construction (Mitigated) Emissions, that the Project is expected to result in a significant regional NO_x impact during proposed construction activities. In addition, Table IV.A-12, Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Mitigated) and Operations, of the Draft EIR shows that regional NO_x and VOC would also exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds. The City concurs that it is reasonably foreseeable that Tier 4 Final might not be the cleanest technology if construction were to occur later during the 20-year term of the Development Agreement. On November 3, 2021, CARB held remotely the first public workshop on the development of Tier 5 emission standards that will seek to further reduce NO_x by 50 percent and PM emissions by 90 percent from off-road engines—in comparison to Tier 4 Final emission standards—depending on the engine power category—in the 2028–2030 timeframe. CARB has not yet released a formal Tier 5 proposal—rather, a number of concepts have been presented with the intention to solicit feedback from engine manufacturers and other stakeholders. Page 13 of the SCAQMD presentation referenced in this comment acknowledges that electrification/hybridization requirements could be included within Tier 5 emission standards, which would support the Governor’s Executive Order (directing CARB to develop and propose a full transition to Zero Emissions [ZE] by 2035, wherever feasible). Consistent with SCAQMD’s recommendation, the City has revised Mitigation Measure AIR-MM-1 to commit to using Tier 5 construction equipment, where commercially available. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 1-3

Health Risk Impacts during Project Operation

CEQA Guidelines §15126.2 and §15126.4 require an EIR to include a description of the significant environmental effects of a proposed project, significant environmental effects which cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a “substantial, or potentially substantial, adverse change in the environment.” The Proposed Project is to build and

expand the use of the facility to more than 1.8 million square feet area. In addition to the air quality impacts from the criteria pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to existing and future permitted stationary sources, mobile sources, and other emission sources) during the operation phases of the Proposed Project will need to be appropriately evaluated using qualitative and/or quantitative approaches in this EIR to justify whether the Proposed Project has potentially substantial adverse impacts or not.

In the Air Quality Section in the DEIR, the Lead Agency mentions, “*The primary sources of potential TACs associated with Project operations include diesel particulate matter from delivery and production trucks and, to a lesser extent, facility operations (e.g., natural gas-fired boilers). However, these activities and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions.*”¹² However, based on the South Coast AQMD Facility Information Detail (F.I.N.D) database¹³, it appears that the Proposed Project has more than ten permitted sources on-site (e.g., emergency diesel engines, boilers, and spray booths) and is also applying for additional nine permitted units (e.g., boilers and internal combustion engines). With the expansion of the use of the facility in the future, it is also expected that more new and modified equipment will be needed to use on site. The incremental uses from the new and modified stationary sources and their net increase of criteria pollutant emissions and TACs emissions are potentially substantial, but they are not evaluated and discussed in the DEIR. Therefore, it is also unclear if the primary sources of TACs associated with Project operations are the diesel particulate matters from the trucks.

¹² DEIR. Page IV.A-72.

¹³ South Coast AQMD Facility Information Detail (F.I.N.D) can be found at: <http://www.aqmd.gov/nav/FIND>.

Response to Comment No. 1-3

The Draft EIR provided a qualitative evaluation of health risk during the operation phase of the Project. As discussed on page IV.A-72 in Section IV.A, Air Quality, of the Draft EIR, “The primary sources of potential TACs associated with Project operations include diesel particulate matter from delivery and production trucks and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions.” The SCAQMD states that the SCAQMD Facility Information Detail (FIND) database identifies that the Project Site includes permitted on-site sources and that the Project would include additional permitted sources. For clarification purposes, the FIND database identifies six emergency generators, six natural gas fired boilers, and four spray paint booths. All but one of the emergency generators would be decommissioned as part of the Project. It is unclear how the SCAQMD has determined that the Project would require

application for an additional nine permitted units. Further clarification is provided below regarding the permitted sources (a description of each of these sources and how the Draft EIR qualitatively addressed the TAC emissions is provided below).

Table IV.A-10 on page IV.A-70 in Section IV.A, Air Quality, of the Draft EIR shows that diesel particulate matter (DPM) emissions from emergency generators would decrease under the Project. However, the emergency generator calculation sheet was inadvertently omitted from Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. This worksheet is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As shown therein, existing DPM emissions were provided based on Television City's 2021 Annual Emissions Report (AER) and reflect the actual number of hours each of the six emergency generators were operated. See the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments included as Appendix FEIR-9 of this Final EIR. With the exception of one emergency generator (ID 618456 [i.e., Big Blue]), all existing emergency generators will be decommissioned and replaced with new emergency generators. Since the seven new generators could be located within 50 meters (approximately 170 feet) of residential uses, the Project will be required to comply with the new requirements in Table 1 of SCAQMD Rule 1470. A new PDF (i.e., Project Design Feature AIR-PDF-2) is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring all new generators to meet the new emission standards included in Table 1 of SCAQMD Rule 1470 and USEPA Tier 4 Final standards regardless of whether the generator is within 50 meters of sensitive land uses. While the emergency generators will likely be permitted for 200 hours per year consistent with SCAQMD Rule 1470, it is conservative to limit the usage in the analysis to historical annual hours of use (Television City's 2019–2021 AERs provide the fuel consumption for each emergency generator based on engine maintenance logs and fuel usage and shows approximately nine hours of runtime per existing emergency generator on an annual basis) since future emissions from new generators will substantially decrease in comparison to existing emergency generators (i.e., resultant DPM emission factors substantially decrease for future Rule 1470-compliant generators in comparison to existing older generators). Analysis of both existing and proposed generators at the maximum permitted hours (200 hours per year), rather than actual hours, would over-estimate the reduction in future incremental DPM emissions and reduce the Project's potential incremental health risk impacts for hours of generator usage that would typically not occur on an annual basis. The average DPM emission factor for the five existing emergency generators that will be decommissioned is 0.40 g/hp-hr and would decrease to 0.02 g/hp-hr for the new generators. The existing generators result in approximately 41.8 lbs/yr of DPM based on historical annual hours of use or approximately 837.5 lbs/yr at 200 hours. Under the Project, the seven new emergency generators combined with the Big Blue generator would result in approximately 8.2 lbs/yr of DPM based on historical annual hours of use or approximately 140.5 lbs/yr at 200 hours. The ratio of Project versus existing generators based on historical hours is 5.1 and is 5.9 at 200 hours per year. Thus, the difference in Project versus existing emissions increases with

increased use of the emergency generators, and it is, therefore, more conservative to analyze generator usage based on historical annual hours of operation. Based on this information, potential TAC emissions from proposed emergency generators would substantially decrease in comparison to the existing emergency generators.

Footnote b in Table IV.A-7 on page IV.A-64 of the Draft EIR shows that existing paint spray booths (four permitted sources) will be removed as part of the Project. The emission inventory from these sources is also provided in AERs on file with SCAQMD. The AER emission inventory data from the existing spray booths is included in Appendix FEIR-9 of this Final EIR. As further discussed in footnote b of Table IV.A-7 of the Draft EIR, given the nature and logistics of production activities in newer studio facilities and how spray paint booths are operated at Manhattan Beach Studios, an affiliate of the Applicant, spray paint booth usage is assumed not to increase as a result of the Project despite the future expansion of production and support uses. Therefore, as stated in the Draft EIR, spray paint booth usage would not increase in comparison to existing conditions. Furthermore, any new spray paint booths at the Project Site would include the most up-to-date equipment, which would comply with applicable SCAQMD regulatory requirements (e.g., more efficient paint sprayers and high efficiency particulate air [HEPA] filtration) and SCAQMD permit conditions. Based on this information, potential TAC emissions from any future spray paint booths would not be expected to exceed existing spray paint booth emissions on the Project Site.

Natural gas usage (e.g., boilers) on the Project Site was calculated within CalEEMod and presented in Table IV.A-7 on page IV.A-64 of the Draft EIR. As shown in Table IV.A-7 of the Draft EIR, the Project would result in a minimal increase in natural gas emissions and resultant TACs. TAC emissions from natural gas are not a substantial contributor to health risk impacts in comparison to DPM, as reflected in SCAQMD's MATES-V study. As discussed on page IV.A-24 of the Draft EIR, the MATES-V study estimated the cancer risk from toxic air emissions throughout the South Coast Air Basin (Air Basin) by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V study concluded that approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating). While the Draft EIR accounted for and analyzed natural gas usage associated with the Project, after the publication of the Draft EIR, the City of Los Angeles subsequently passed an all-electric buildings ordinance (Ordinance No. 187714), which does not allow installation of new natural gas-powered equipment, with certain exceptions. The Project would comply with the new ordinance.

Comment No. 1-4

Moreover, the Air Quality Section in the DEIR, the Lead Agency, also mentions, “SCAQMD recommends that HRAs be conducted for substantial individual sources of diesel particular matter (e.g., trucks stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units)”¹⁴, and the Lead Agency references it as from South Coast AQMD Health Risk Assessment Guidance¹⁵. However, this written language is likely to be taken from CARB Air Quality and Land Use Handbook: A Community Health Perspective, under Table 1-1: Recommendations on Sitting New Sensitive Land Uses, and specifically for Distribution Centers¹⁶. The above statement and Table 1-1 are meant for advisory recommendations on sitting new sensitive land uses (e.g., residences, schools) near distribution centers and other land use types. The Lead Agency may misunderstand the above advisory recommendations from CARB Air Quality and Land Use Handbook because the Proposed Project is not a distribution facility, nor are there any sitting new sensitive receptors near the Project site. Therefore, not including an HRA based on the above statement is misused and is not reasonably explained.

Based on Table 6 in Appendix M—Transportation Section, The [sic] Lead Agency mentions that the total net Project new trips are 787 and 855 in the morning and the afternoon peak hour trips, respectively. However, it is unclear if the net increased daily trips included how many daily truck trips are involved in the operations. If trucks are used in the Proposed Project’s operational activities (e.g., delivering equipment), the Lead Agency should identify the number of daily trucks traveled from and to the site (e.g., number of one-way trucks per day) and state that in the EIR. However, the Lead Agency did not mention the number of trucks used for daily operations in the DEIR. South Coast AQMD staff recommends that the Lead Agency revise and identify the number of trucks potentially involved in the operational activities and include them in the Final EIR. If it is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

The operation of the Proposed Project will attract heavy-duty, diesel-fueled vehicular trips (e.g., trucks for delivering equipment) that emit Diesel Particulate Matter (DPM), which is an air toxic and carcinogen. Furthermore, the Proposed Project is close to the local residences and exposes existing (e.g., the apartment is within 25 ft east of the Project site) and future sensitive receptors to potential adverse health impacts from carcinogenic emissions generated by diesel-mobile sources. However, based on the DEIR and technical appendices review, South Coast AQMD staff found that the Lead Agency did not perform a mobile source HRA during operation.

¹⁴ DEIR. Page IV.A-72

- ¹⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.
- ¹⁶ CARB Air Quality and Land Use Handbook can be found at: <https://www.arb.ca.gov/ch/handbook.pdf>.

Response to Comment No. 1-4

The SCAQMD has recommended use of SCAQMD's Guidance Document and the CARB Handbook for evaluation of TAC emissions sources in other SCAQMD comment letters. As an example, in 2017 the SCAQMD provided a comment letter on the MND for the Proposed Inland Center Gas Station Project.⁹⁵ As described in the comment letter, the Lead Agency proposed to construct a new gas station with twelve pumps adjacent to existing residential dwellings to the south. The SCAQMD provided the following guidance:

Guidance Regarding Gasoline Dispensing Facilities Site Near Sensitive Receptors

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plan and Local Planning in 2005. Additionally, the California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Health Perspective recommended in 2005 to avoid the siting of housing within 300 feet of a large gas station or 50 feet from a typical gas station. In April 2017, CARB released a Technical Advisory as a supplement to this Handbook. These Guidance documents provide recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. The SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

The SCAQMD provided direction to consider the guidance documents in the Lead Agency's decision to locate a potential TAC emissions source (in that case a gasoline station) near sensitive land uses and included referenced siting distances in the CARB Air Quality and Land Use Handbook. Furthermore, SCAQMD's Guidance Document for

⁹⁵ SCAQMD, Mitigated Negative Declaration (MND) for the Proposed Inland Center Gas Station Project, May 24, 2017, www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/mnd-inlandcenter-052417.pdf?sfvrsn=6, accessed September 25, 2023.

Addressing Air Quality Issues in General Plan and Local Planning (Guidance Document) provides the following information regarding the siting of new facilities on page 2-3.

The potential impacts of new facilities on sensitive sites will depend on a variety of factors including the amount and toxicity of pollutants emitted, the type of air pollution control equipment at the facility, design features of the facility, the distance from the source of emissions to the sensitive receptor, and local meteorology. All these factors should be carefully evaluated when siting a source of air pollution. Typically, the siting process followed by land use agencies to avoid the location of sensitive sites (e.g., residences, health clinics, etc.) near sources of air pollution does not involve the AQMD. The potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor.

Page 1-6 of the SCAQMD's Guidance Document provides CARB recommended minimum separation distances between new sensitive land uses and eight categories of existing sources (Table 1-1 in CARB's Handbook) which include: (1) high-traffic freeways and roads; (2) distribution centers; (3) rail yards; (4) ports; (5) refineries; (6) chrome plating facilities; (7) perchloroethylene dry cleaners; and (8) large gasoline stations. The Project would not include any of these substantial TAC sources. As discussed on page IV.A-72 in Section IV.A, Air Quality, of the Draft EIR, the primary sources of potential TACs associated with Project operations include DPM from delivery trucks (e.g., truck trips on local streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions based on the above referenced guidance documents. As discussed above, the Draft EIR accounted for and analyzed natural gas usage associated with the Project, and the City of Los Angeles subsequently passed an all-electric buildings ordinance, which does not allow installation of new natural gas-powered equipment, with certain exceptions. The Project would comply with the new ordinance. Moreover, as shown in Table IV.A-7 on page IV.A-64 in Section IV.A, Air Quality, of the Draft EIR, emissions of DPM (i.e., PM₁₀) from emergency generators would be reduced relative to existing conditions during Project operations, and the Project will also result in operational reductions relative to the existing conditions of stationary energy (natural gas) emissions and area (on-site equipment) emissions through building and on-site equipment electrification, thus leaving truck trips as the only meaningful source of incremental operational TAC emissions.

SCAQMD does not provide clarification in SCAQMD's Guidance Document or in this comment regarding what level of diesel truck activity from a typical land use development project would require a Health Risk Assessment (HRA). However, the CARB Handbook does recommend to avoid siting new sensitive land uses within 1,000 feet of a distribution

center that accommodates more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units per day (Table 1-1 of the ARB Handbook). Given that page 2-3 of the SCAQMD Guidance Document states that “the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor,” the City as Lead Agency has elected to use the siting distances in Table 1-1 of the CARB Handbook for evaluating health risk impacts from both TAC sources and sensitive uses. Based on this guidance, the Project is not the type of project that would result in substantial trucks trips as contemplated by the CARB Handbook, and the Draft EIR concluded that truck trips would not require additional analysis.

Per the SCAQMD’s recommendation in this comment letter, this Final EIR provides a clear breakdown of anticipated daily Project-related truck trips, constituting substantial evidence that the Project would not be the type of Project that would result in substantial heavy-duty diesel truck trips (i.e., the Project would result in less than 100 diesel trucks per day), thereby confirming the conclusion in the Draft EIR. This information from Gibson Transportation is included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). However, although the Draft EIR correctly concluded that impacts would be less than significant based on the qualitative health risk analysis discussed above in Response to Comment No. 1-2 and this Response to Comment, further evaluation of TAC emissions in response to SCAQMD’s comments is included in this Final EIR to confirm the conclusions of the Draft EIR; refer to the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR’s conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 1-5

Therefore, it is recommended that, at minimum, the Lead Agency provide a qualitative analysis that inventories and evaluates all the stationary sources (including the permitted, proposed, and planned for future units) and mobile sources with the map showing the locations of the stationary sources, the truck routes to and from the site and truck loading/unloading docks, and their proximity to the sensitive receptors under the currently existing and foreseeable probable future conditions and show the justifications if the Proposed Project has potentially substantial health risk impacts or not from the existing condition. If a qualitative analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

If the results from the qualitative analysis show the Proposed Project may have potentially significant health risk impacts, South Coast AQMD staff recommends that quantitative analysis, HRA should be conducted and compare the Proposed Project’s cancer risks to South Coast AQMD CEQA significance threshold of 10 in one million¹⁷ to determine the

level of significance for the Proposed Project's health risk impact in the Final EIR¹⁸. The Lead Agency should also disclose the potential health risks for chronic and acute impacts of the Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Final EIR. If an HRA is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

¹⁷ South Coast AQMD Air Quality Significance Thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

¹⁸ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

Response to Comment No. 1-5

The quantitative HRA includes an assessment of health risk impacts from both Project-related construction and operational activities. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project (see Appendix FEIR-10 of this Final EIR). The HRA prepared in response to these comments demonstrates that health risks from the Project would be a maximum of approximately 7.5 in one million for residences immediately east of the Project Site (Broadcast Center Apartments), which is below the applicable significance threshold of 10 in one million. Of note, the construction related impact was approximately 6.3 in one million and the operational incremental risk was approximately 1.2 in one million (difference between the buildout operational impact of 7.4 in one million and existing impact of 6.2 in one million). The increase in operational risk is primarily the result of conservatively locating proposed new emergency generators in close proximity to residents east of the Project Site whereas existing emergency generators are spread out throughout the Project Site (see Response to Comment No. 1-3). This risk analysis is conservative as it assumes an outdoor exposure for the entire length of construction and operations and does not account for any reductions from the time spent indoors, where air quality tends to be better. As shown in the quantitative HRA, the Draft EIR's qualitative health risk analysis correctly determined that Project health risk impacts would be less than significant.

Comment No. 1-6

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project, including more than 1.8 million square foot modernization and expansion of media production facilities, methane mitigation systems, or any other soil remedial activities that may be needed, would require modifying the existing or use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment requiring South Coast

AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Response to Comment No. 1-6

The SCAQMD refers to page IV.A-16 in Section IV.A, Air Quality, of the Draft EIR, which provides a list of SCAQMD rules and regulations applicable to land use development projects (including this Project). Rule 1113—Architectural Coatings, Rule 1146.2—Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters and Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion Ignition Engines are included in this list. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, in Response to Comment No. 1-3, and in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR), seven new diesel fuel emergency generators would be included as part of the Project. Since the seven new generators could be located within 50 meters (approximately 170 feet) of residential uses, the Project will be required to comply with the new requirements in Table 1 (PM Emission Standards for New Stationary Emergency Standby Diesel-Fueled CI Engines Located at a Sensitive Receptor or 50 Meters or Less From a Sensitive Receptor—gram per brake horsepower-hour (g/bhp-hr)) of SCAQMD Rule 1470. A new PDF (i.e., Project Design Feature AIR-PDF-2) is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring all new generators to meet the new emission standards included in Table 1 of SCAQMD Rule 1470 and USEPA Tier 4 Final standards regardless of whether the generator is within 50 meters of sensitive land uses. Regarding boilers, natural gas consumption was calculated consistent with CalEEMod default factors and emission factors. Please note that the City of Los Angeles subsequently passed an all-electric buildings ordinance, which does not allow installation of new natural gas-powered equipment, with certain exceptions. The Project would comply with the new ordinance.

Comment No. 1-7

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not

accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Response to Comment No. 1-7

The City has coordinated with SCAQMD regarding its comments on the Draft EIR. As requested, the City's responses to SCAQMD's comments will be sent to the SCAQMD as part of this Final EIR distribution prior to certification of this Final EIR. The City, in making the findings for the Project, will comply with the requirements of CEQA Guidelines Section 15091. As noted in the responses above, all of the SCAQMD's comments have been fully addressed and the conclusions in the Draft EIR have been confirmed.

Comment Letter No. 2

Charles C. Holloway
Utility Services Manager
Environmental Planning and Assessment
Department of Water and Power
111 N. Hope St., Rm. 1044
Los Angeles, CA 90012-2607

Comment No. 2-1

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the TVC 2050 Project (Project) located at 7716–7860 West Beverly Boulevard, Los Angeles, CA 90036. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. Based on our review of the Draft Environmental Impact Report prepared for the Project, we respectfully submit the comments below:

Comments:**Joint:**

1. The City of Los Angeles, herein referred to as City, shall pertain to its employees, agents, consultants, contractors, officers, patrons, or invitees of the City, or by any other of the City's affiliated entities.
2. This response shall not be construed as an approval for any project.

Response to Comment No. 2-1

This introductory comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 2-2**Water System:****IV.M.1 Utilities and Service Systems—Water Supply and Infrastructure**

1. Page IV.M.1-39: The information in the fourth paragraph states that the TVC 2050 Project (Project)'s estimated net operational domestic water demand of

269,123 gpd (301 afy) is a fraction of LADWP's projected water demand shown in LADWP's 2020 Urban Water Management Plan (UWMP) and it "would represent a miniscule proportion of LADWP's projected water demand and supply in 2025". [sic]

LADWP finds that the Project's water demand is included in LADWP's 2020 UWMP, which is a planning document that forecasts adequate water supplies to meet all projected water demands in the City of Los Angeles (City) through the year 2045 based on the following:

- The Los Angeles Department of City Planning has determined that the Project is consistent with the demographic forecasts for the City from the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) demographic projection by the Southern California Association of Governments (SCAG).
- The City's water demand projection in LADWP's 2020 UWMP was developed based on SCAG's 2020 RTP/SCS demographic projection.

Projects that conform to the demographic projection from SCAG's 2020 RTP/SCS and are currently located in the City's service area are considered to have been included in LADWP's water supply planning efforts; therefore, the projected water supplies would meet the Project's water demand.

The fourth paragraph on page IV.M.1-39 shall be revised to reflect the conclusion stated in the Water Supply Assessment (WSA) for the TVC 2050 Project. Please see the enclosed file for the WSA conclusion.

Response to Comment No. 2-2

The suggested revisions of the commenter have been incorporated into Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Specifically, the language quoted by the commenter, which is found on page IV.M.1-39 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR and refers to the Project's net operational water demand as "a miniscule proportion of LADWP's projected water demand and supply in 2025," has been clarified. The sentence that includes this text has been replaced with the following text:

As stated in the WSA, this additional water demand for the Project Site has been accounted for in the City's overall total demand projections in LADWP's 2020 UWMP using a service area-wide approach that does not rely on individual development demand. LADWP's 2020 UWMP utilized SCAG's 2020–2045 RTP/SCS data that provide for more reliable water demand forecasts, considering changes in population, housing units, and employment.

The second paragraph from the conclusion of the WSA states the following.

Based on the Planning Department's determination that the Project is consistent with the demographic forecasts for the City from the 2020 SCAG RTP, LADWP finds that the Project water demand is included in the LADWP's 2020 UWMP, which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. LADWP concludes that the maximum projected 301 AFY increase in the total water demand for this Project is accounted for in the LADWP's 2020 UWMP 25-year water demand projections. LADWP finds it will be able to meet the proposed water demand of the Project as well as existing and planned future water demands of its service area.

Much of the content of this paragraph has already been incorporated into the discussion on pages IV.M.1-39 and IV.M.1-40 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR. However, in response to this comment, as shown in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the text in underline below has been incorporated into the first partial paragraph on page IV.M.1-40 of the Draft EIR.

Furthermore, as stated in the WSA, based on the Department of City Planning's determination that the Project is consistent with the demographic forecasts for the City from the SCAG's 2020–2045 RTP/SCS, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and anticipated future water demands within LADWP's service area through the year 2045.

Comment No. 2-3

If you have any questions regarding the above comments, please contact Ms. Jazmin Martin of my staff, at (213) 367-1768 or Jazmin.Martin@ladwp.com.

Response to Comment No. 2-3

This comment provides a point of contact that will be included on future public mailings for the Project. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 2-4**Conclusion**

The Project is estimated to increase the total maximum water demand within the site by 301 AF annually. This additional water demand for the Project site has been accounted for in the City's overall total demand projections in the LADWP's 2020 UWMP using a service area-wide approach that does not rely on individual development demand. The LADWP's 2020 UWMP utilized SCAG's RTP data that provide for more reliable water demand forecasts, considering changes in population, housing units, and employment.

Based on the Planning Department's determination that the Project is consistent with the demographic forecasts for the City from the 2020 SCAG RTP, LADWP finds that the Project water demand is included in the LADWP's 2020 UWMP, which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. LADWP concludes that the maximum projected 301 AFY increase in the total water demand for this Project is accounted for in the LADWP's 2020 UWMP 25-year water demand projections.

LADWP finds it will be able to meet the proposed water demand of the Project as well as existing and planned future water demands of its service area.

Response to Comment No. 2-4

This comment concludes the letter and acknowledges that the Project's annual increase in water demand together with existing and planned future water demands of its service area will be met by LADWP. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 3

Rowena Lau
Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment
2714 Media Center Dr.
Los Angeles, CA 90065-1733

Comment No. 3-1

This is in response to your July 14, 2022 letter requesting a review of the proposed mixed-use project located at 7716–7860 West Beverly Boulevard, Los Angeles, CA 90036. The project will consist of TV facilities. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

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

Response to Comment No. 3-1

This comment acknowledges that LA Sanitation (LASAN) has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed Project, and that LASAN Wastewater Engineering Services Division (WESD) is responsible for evaluation of local sewer divisions and wastewater capacity to guide future development. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-2**Projected Wastewater Discharges for the Proposed Project:**

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Existing</i>			
Sound Stages	50 GPD/KGSF	28,900 SF	(4,777)
Production Support	50 GPD/KGSF	325,450 SF	(16,272)
Production Office	170 GPD/KGSF	163,090 SF	(27,725)
General Office	170 GPD/KGSF	159,600	(27,132)
<i>Proposed</i>			
Sound Stages	50 GPD/KGSF	350,000 SF	17,500
Production Support	50 GPD/KGSF	104,000 SF	5,200
Production Office	170 GPD/KGSF	700,000 SF	119,000
General Office	170 GPD/KGSF	700,000 SF	119,000
Retail	25 GPD/1000 SQ.FT	20,000 SF	500
Total			185,294 GPD

Response to Comment No. 3-2

The table shown above as Comment No. 3-2 is LASAN's estimation of the net operational wastewater that would be generated by the Project. This differs from that studied in the Draft EIR and reviewed by LASAN in its December 13, 2021, and July 13, 2021, letters, which are included as part of the Utility Report within Appendix O of the Draft EIR. Specifically, the existing floor area numbers shown in this table do not reflect the existing floor area on-site and thus do not reflect existing wastewater generation, which results in the EIR providing a more conservative estimate compared to the estimate provided by LASAN. In addition, the wastewater demand analysis in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR and the supporting Utility Report included as Appendix O of the Draft EIR is based on LADWP's detailed analysis of water demand associated with the Project and accounts for all elements of the Project, including basecamp, a Mobility Hub, covered parking and restaurant uses. Furthermore, the wastewater analysis in the Draft EIR (and in LASAN's December 13, 2021, letter) also accounts for the maximum wastewater demand associated with the Project's limited Land Use Exchange Program. As shown in Table IV.M.2-3 on page IV.M.2-16 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR and in the Utility Report, the Project would result in a net increase of approximately 217,498 gallons of wastewater per day under the maximum demand scenario. Based on LASAN's data, including data from its December 13, 2021, letter, the Utility Report concluded that the existing capacity is available to accommodate this increase in wastewater flow.

Comment No. 3-3**SEWER AVAILABILITY**

The sewer infrastructure in the vicinity of the proposed project includes an existing 10-inch line on Fairfax Av R/W. The sewage from the existing 10-inch line feeds into a 21-inch line on Crescent Heights Blvd. The sewage from the 21-inch line feeds into a 39-inch line on Crescent Heights Blvd before discharging into a 48-inch sewer line on Crescent Heights Blvd. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 10-inch line cannot be determined at this time without additional gauging.

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

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
10	Fairfax Av R/W	*	416,000 GPD
21	Crescent Heights Blvd.	39	2.85 MGD
39	Crescent Heights Blvd.	54	16.43 MGD
48	Crescent Heights Blvd.	33	28.91 MGD

* No gauging available

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

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 25 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

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

Response to Comment No. 3-3

The description of existing wastewater infrastructure in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR and the supporting Utility Report included as Appendix O of the Draft EIR is based on information provided by LASAN in its December 13, 2021, and July 13, 2021, letters responding to a request for wastewater services information for the Project (refer to Exhibit 4 of the Utility Report included as Appendix O of the Draft EIR), as well as review of maps and data by KPFF Engineers (e.g., existing surveys and data and mapping from NavigateLA). The LASAN letters include different discharge flow paths that provide for a more comprehensive understanding the existing sewer system in the Project vicinity. Nonetheless, the information in the December 13, 2021, and July 13, 2021, letters is consistent with what is included in this comment. Specifically, the routing of the sewer discharge in the City system includes the same starting pipe (i.e., the 10-inch diameter Fairfax Avenue line with a 50-percent design capacity of 416,000 gallons per day [gpd]) and ending pipe (i.e., the 48 inch-diameter Crescent Heights Boulevard line with a 50-percent design capacity of 28.91 million gpd). As with the previous input provided by LASAN in its December 13, 2021, and July 13, 2021, letters regarding the Project, this comment provides LASAN's standard conclusion that the sewer lines appear to be able to accommodate the Project and that the Hyperion Water Reclamation Plant has sufficient capacity for the Project. Consistent with this comment, as part of the Project, all future sewer connections and related infrastructure would be reviewed and approved by LASAN as required by the standard permitting process.

Comment No. 3-4**STORMWATER REQUIREMENTS**

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

POST-CONSTRUCTION MITIGATION REQUIREMENTS

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

The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

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

Response to Comment No. 3-4

As discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR, the Project would comply with the City's Low Impact Development (LID) Ordinance, which describes infeasibility criteria. Feasibility of treatment is confirmed by the City of Los Angeles during the regulatory plan check process. The LID Ordinance provides for a number of alternatives for stormwater management. As discussed on page IV.G-30 of the Draft EIR, based on the Preliminary Geotechnical Engineering Investigation prepared for the Project by Geotechnologies, Inc. (and included as Appendix E.1 of the Draft EIR), infiltration is not feasible. Since infiltration has been determined to be infeasible by the Preliminary Geotechnical Engineering Investigation, the next tier of treatment is a stormwater capture and use system. As described in Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project would include the installation of a capture and reuse system to be used for irrigation. If that approach is later determined to be infeasible during the plan check process, high efficiency biofiltration/bioretention systems, consistent with the LID requirements, would be installed. In either case, Best Management Practice (BMP) systems would be designed within the Project Site to capture the typical urban contaminants found in stormwater. As the current stormwater is discharged without any such controls, the BMPs installed as part of the Project would be an improvement over the current conditions.

The comment refers to these measures as "post-construction mitigation requirements." However, please note that the regulatory compliance measures described above are not mitigation measures, as these measures are required by law. A summary of regulatory measures related to hydrology and water quality that are applicable to the Project is provided in Appendix FEIR-11 of this Final EIR.

Comment No. 3-5**GREEN STREETS**

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

Response to Comment No. 3-5

This comment discusses the City's Green Street Initiative, which does not relate to the Draft EIR's analysis of the Project's environmental impacts. According to the City of Los Angeles Bureau of Sanitation website, Green Street is "a storm water management approach" and not a current requirement. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-6**CONSTRUCTION REQUIREMENTS**

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

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

Response to Comment No. 3-6

As discussed on page IV.G-29 in Section IV.G, Hydrology and Water Quality, of the Draft EIR, Project construction would disturb more than one acre of soil, and, therefore, the Project would be subject to a Construction General Permit with the State Water Resources Control Board (SWRCB), which governs stormwater discharge during construction, including sediment and pollutant reduction/elimination. In accordance with the requirements of the Construction General Permit, the Project would prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs to be used during construction to manage stormwater and non-stormwater discharges. BMPs would include, but would not be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, Project construction activities would occur in accordance with City grading permit regulations (Los Angeles Municipal Code [LAMC] Chapter IX, Division 70), including the preparation and implementation of an erosion control plan, to reduce the effects of sedimentation and erosion. Erosion control BMPs may include slope drains that can be used to intercept and direct surface runoff or groundwater into a stabilized area or compost socks and berms that act as three-dimensional biodegradable filtering structures to intercept runoff where sheet flow occurs. In addition, in accordance with regulatory requirements, a Wet Weather Erosion Control Plan (WWECP) would be implemented should grading activities occur during the rainy season. A WWECP is a subset of the more general erosion control plan discussed on pages IV.G-29 and IV.G-35 of Section IV.G, Hydrology and Water Quality, of the Draft EIR. The WWECP is meant specifically for implementation of the rainy season (starting on September 1), whereas the general erosion control plan accounts for the full calendar year. In some cases the erosion control plan can be used as the WWECP, or, a site/project specific WWECP with additional BMPs during the rainy season may be necessary.

As stated on page IV.G-35 of the Draft EIR, through compliance with all applicable NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, Project construction activities would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. As such, construction impacts related to erosion and flooding on- or off-site would be less than significant.

Comment No. 3-7**GROUNDWATER DEWATERING REUSE OPTIONS**

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City

of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

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

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

To help offset costs of water conservation and reuse systems, LADWP offers a Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from the Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

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

Response to Comment No. 3-7

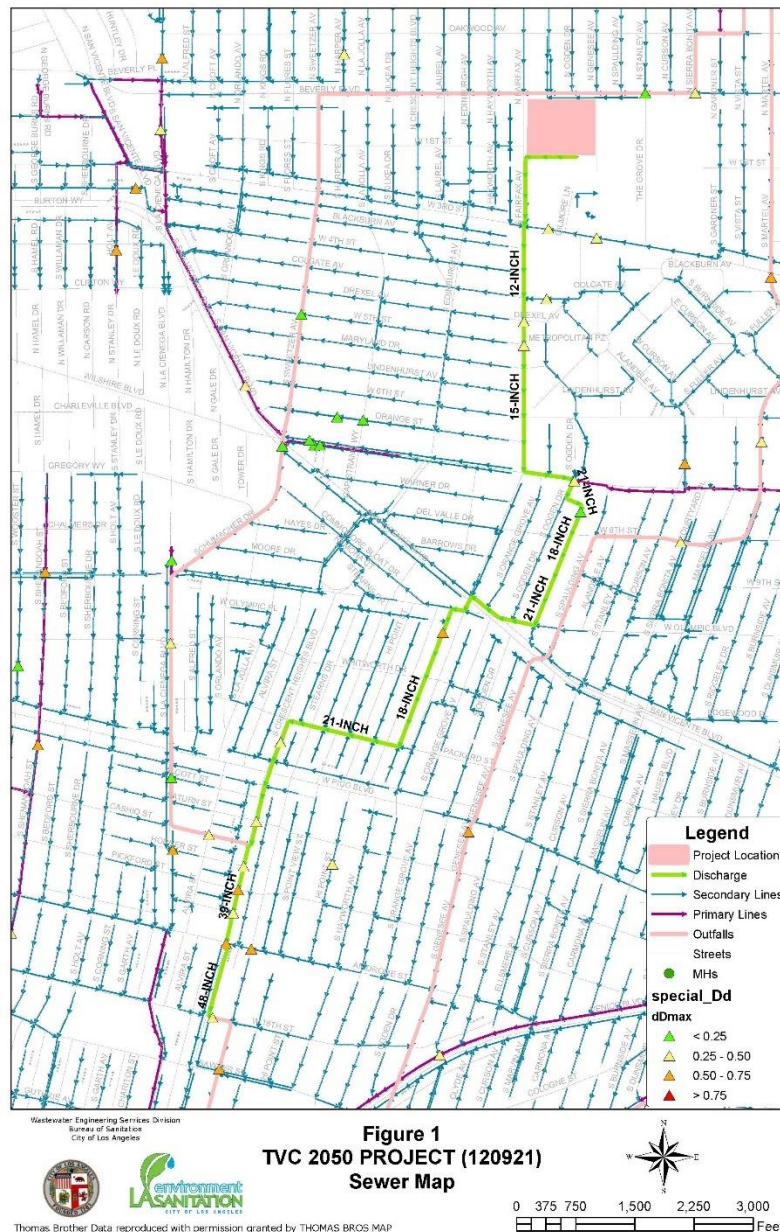
As stated on page IV.M.1-36 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Project would comply with the applicable provisions of Ordinance No. 184248, including Section 99.04.305.4. Temporary dewatering is planned for below-grade parking structures and building foundation excavation and construction. As discussed on pages IV.G-30 and IV.G-31 of the Draft EIR, if conditions warrant, a temporary dewatering system consisting of pumps and filtration would be installed and operated in accordance with NPDES requirements. Section 99.04.305.4 of Ordinance No. 184248 requires that extracted groundwater be reused on-site if feasible to do so or discharged to the sewer if not. However, it is not anticipated that extracted groundwater would be reused on-site due to the volume and general water quality. Any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. Additionally, per Project Design Feature GEO-PDF-1, which is included on pages IV.D-18 to IV.D-19 in Section IV.D, Geology and Soils, of the Draft EIR, the below-grade parking structures would be designed to withstand hydrostatic pressure so that post-construction dewatering would not be necessary.

Comment No. 3-8**SOLID RESOURCE REQUIREMENTS**

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

Response to Comment No. 3-8

This comment summarizes the City's recycling requirements. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 3-9**Response to Comment No. 3-9**

This comment includes a technical exhibit with regard to wastewater infrastructure. This exhibit has been accounted for in the wastewater analysis within Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR and the supporting Utility Report included as Appendix O of the Draft EIR.

Comment Letter No. 4

Michael Gralapp
President
A & G Lumber Company
5942 Washington Blvd.
Culver City, CA 90232-7325

Comment No. 4-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 4-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 5

Beverly Fairfax Community Alliance
info@beverlyfairfaxcommunityalliance.org

Comment No. 5-1

On behalf of the Beverly Fairfax Alliance, we want to provide our comments on the Draft Environmental Impact Report for the TVC 2050 Project. We join the Beverly Wilshire Homes Association, the Save Beverly Fairfax HOA, the Hancock Park Homeowners Association, the Miracle Mile Residents association, and the hundreds of community members that have provided comments to this Draft EIR.

Response to Comment No. 5-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 5-2

To the extent that what is being proposed at the Project site can be understood from the DEIR's uncertain and convoluted description, TVC 2050 is too large and intense for its proposed location. It will alter the fundamental character of this community. We hope the developer will step back and rethink what he is proposing and come back to the community with a well-defined and more reasonable project.

Response to Comment No. 5-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description was completed in full compliance with CEQA. Refer to Response to Comment No. 11-3 regarding the size of the Project. As demonstrated in the analysis provided on pages IV.H-39 through IV.H-57 of Section IV.H, Land Use and Planning, of the Draft EIR, the Project would not conflict with applicable land use plans and policies, including those that specifically address compatibility with surrounding land uses.

Comment No. 5-3

The project cannot be understood based on the Draft EIR's description. The first line of the Project Description states: "The TVC 2050 Project would establish the TVC 2050 Specific Plan...". [sic] There is no Specific Plan in the Draft EIR. Did the City not have the Specific Plan or chose not to make it available to the public? Please explain how the public is

supposed to evaluate the TVC 2050 Project when the key document describing the project does not exist? Why wasn't it provided if it is the central document defining the project?

Response to Comment No. 5-3

As stated consistently throughout the Initial Study, Draft EIR, and Final EIR, the Project is a studio project. The Project would include the establishment of the proposed Specific Plan to continue the existing studio use and modernize and expand production facilities within Television City, which has operated as a studio facility for over 70 years, through a cohesive and comprehensive plan. As stated throughout the Draft EIR, the proposed Specific Plan would permit the development of up to 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description was completed in full compliance with CEQA. As discussed in Topical Response No. 1, the Draft EIR describes all of the physical aspects of the proposed Project that are necessary to fully evaluate the potential impacts of the Project, including, but not limited to, permitted and proposed floor area; a Land Use Exchange Program; design and architecture; height zones; frontage areas; building setbacks; other design elements, including screening and fencing; historic preservation elements; open space; landscaping; public realm enhancements; access; circulation; parking; lighting; signage; Project Site security; sustainability features; anticipated construction schedule; earthwork activities; and haul routes. As also discussed in Topical Response No. 1, the land use and development parameters within the proposed Specific Plan are fully consistent with those set forth in Section II, Project Description, of the Draft EIR. The Draft EIR discusses all of the physical elements of the proposed Specific Plan in the same amount of detail as the proposed Specific Plan itself. The level of detail included in the Draft EIR complies with CEQA and is consistent with the level of detail in certified EIRs for other specific plans throughout Los Angeles.

As discussed in Topical Response No. 1, CEQA defines the "project" to be analyzed in the EIR as the "physical change in the environment," not the regulatory document describing that change. Also note the OPR Guide to Specific Plans provides that, "[t]o the extent feasible, the process of preparing the specific plan and the environmental analysis should proceed concurrently because both documents require many of the same studies and resulting information. The information in the EIR provides decision-makers with the insight necessary to guide policy development, thereby ensuring the plan's policies will address and provide the means by which to avoid potential impacts to the environment."

An initial draft of the Specific Plan that was provided by the Applicant has been publicly available since 2021 as part of the administrative record. Further, neither CEQA nor City policy requires a draft Specific Plan itself to be included in the Draft or Final EIR.

Nonetheless, in response to comments on the Draft EIR, a Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website for informational purposes. Note that this draft has not been approved by the City. Please also refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

Comment No. 5-4

Similarly, the Sign District has not been made available to the public. It is mentioned in the Draft EIR but not provided.

Response to Comment No. 5-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-10, and 26-129 regarding the Sign District.

Comment No. 5-5

The "Conceptual Site Plan" provided by the Draft EIR does not define what will be built. The Draft EIR states that the conceptual site plan "illustrates one possible development scenario." The Draft EIR confirms "actual development would be governed by the requirements of the proposed Specific Plan and not the conceptual site plan....". [sic] Please explain how the public supposed to know what the Project is if the Conceptual Site Plan is not the development, and the Specific Plan is not provided? How can the City evaluate the environmental impacts of the Project if the Project is not defined?

The other plans included with the Draft EIR are all also identified as illustrative. Even the Height Zone map says it is illustrative and the Draft EIR states the "height zones do not represent the actual development footprint of Project buildings."

How can the public or the City know what will be built and where? How did the City undertake its environmental analysis if it does not know what will actually be built, where and how?

Response to Comment No. 5-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, a CEQA project description is required to disclose the nature of the project and its main features. In addition, the degree of specificity required depends on the type of project. There must be sufficient information to understand the environmental impacts of the proposed project. The EIR must achieve a balance between technical accuracy and public understanding. The fact that the plans and other figures in

the Project Description are labeled as “conceptual” and/or “illustrative” does not render the Project Description unstable or not finite. There is no provision under CEQA that requires conceptual plans for a specific plan project to identify the precise location and use of each building as requested by the commenters, and the individual building for future development under the proposed Specific Plan will not be created until after the adoption of the Specific Plan. Any plans included in an EIR or other CEQA document are inherently conceptual, and plans are finalized during the building permit process, which occurs after a project is approved and its EIR certified.

The EIR for the Project provides the detail required by CEQA and is subject to mandated review processes by the City for future implementation. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 regarding how the Draft EIR describes the physical aspects of the proposed Specific Plan that are necessary to fully evaluate the potential impacts of the Project. In particular, the proposed height zones, stepbacks, and frontage areas will dictate the placement, orientation, mass, and height of potential future buildings.

The Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). As discussed in detail in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Specific Plan would include a regulatory framework for implementation of the Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

With regard to the height zones, pages II-17 through II-20 of Section II, Project Description, of the Draft EIR provide a detailed description of the proposed height zones, including Figure II-5, Height Zone Map. Additional figures have also been added as part of this Final EIR for informational purposes in response to public comments. Refer to Figure II-4 through Figure II-6 on pages II-244 through II-246 for axonometric diagrams and to Figure II-4(a) and Figure II-4(b) within Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for aerial renderings depicting the Conceptual Site Plan. These height zones are not proposed as “illustrative” height zones. Rather, as described in the Draft EIR, these height zones set forth the maximum building height limits for all buildings within the Project Site (there is currently no height limit under the existing zone designations). New buildings would occupy only a portion of the building envelope permitted in each height zone. The height zones in the Draft EIR are the same as those in the proposed Specific Plan.

HEIGHT ZONE MAP

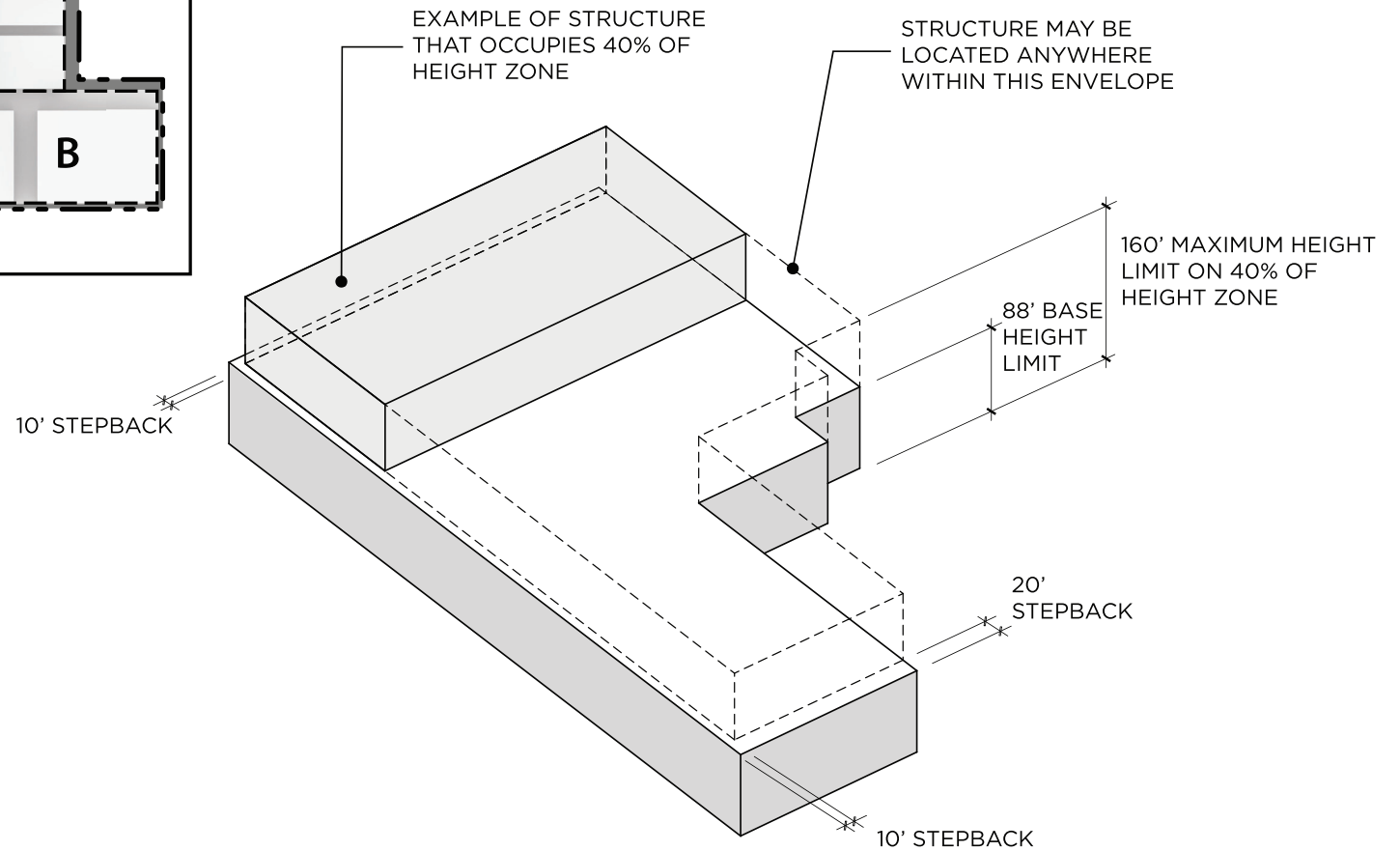
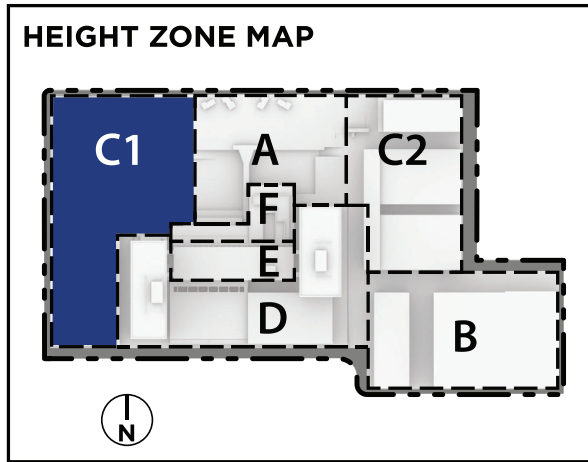


Figure II-4
Height Zone C1 Diagram

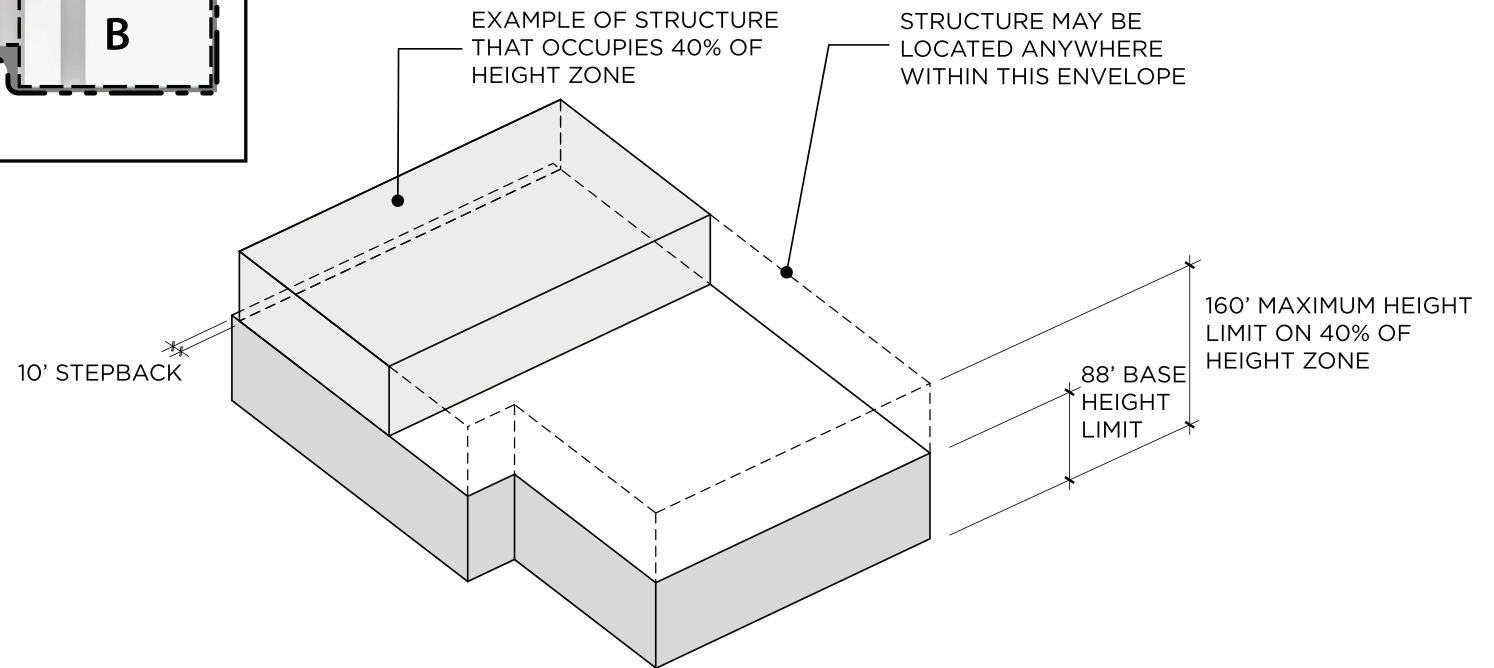
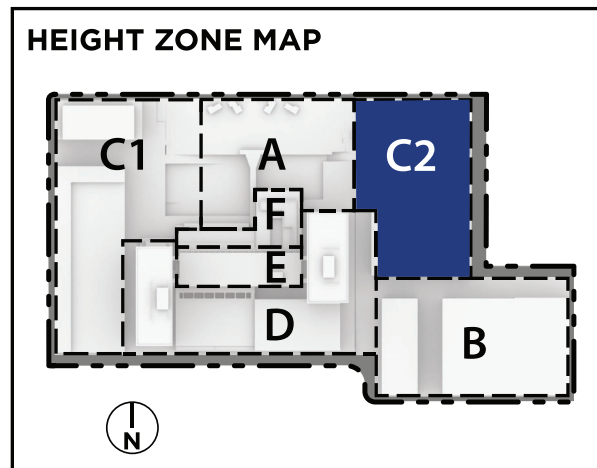


Figure II-5
Height Zone C2 Diagram

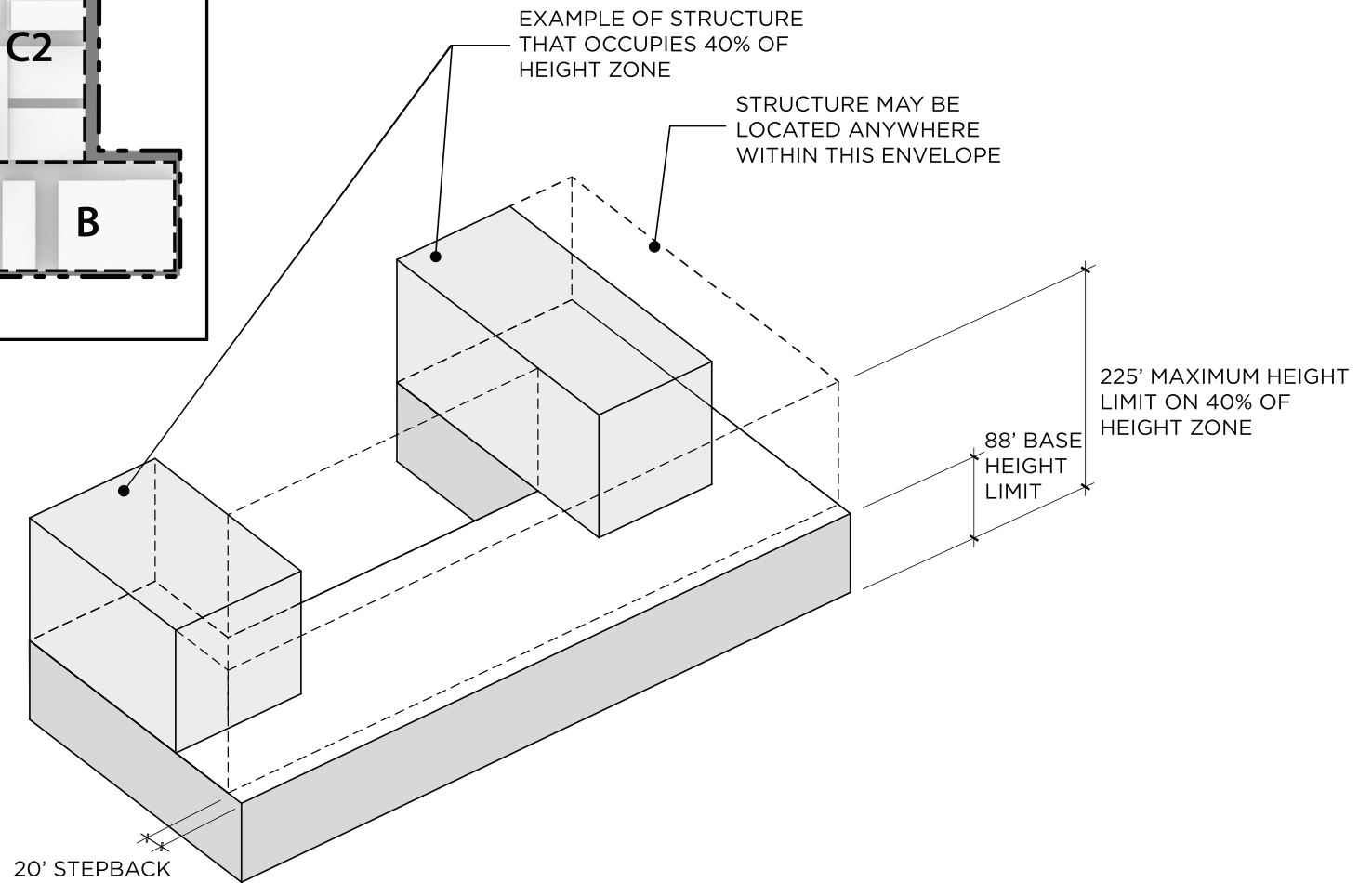
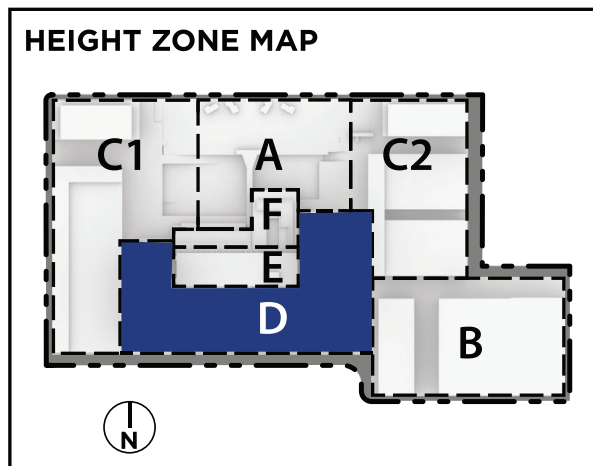


Figure II-6
Height Zone D Diagram

Comment No. 5-6

What are the uses permitted as part of the TVC 2050 Project? Is it not just studios and offices? The DEIR lists a couple dozen possible uses including many typical studio uses and then adds “communication facilities, conference facilities, modular offices and trailers, ...special events, audience and entertainment shows, museum exhibits, theaters, educational facilities, e-sports, fitness facilities, mills/manufacturing, ...recreational facilities, restaurants and special event areas including the sale of alcoholic beverages, warehouses, ...transportation facilities, including a Mobility Hub and helipad, ...medical offices... *and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.*” Please explain how did the City decide what uses it would evaluate in the 100 or more uses permitted by the C2 zone? Since the public does not have the Specific Plan and apparently the City either does not have the Specific Plan or chose not to make it available in the Draft EIR, please explain how the City decided which environmental impacts to study based on the hundred potential uses in the C2 zone?

How did the City define impacts to be studied if there is no clarity as to what uses will be built and where? Obviously different uses can have very different impacts. An auditorium sports arena to seat 3,000 people as permitted in the C2 zone would have very different impacts from a warehouse.

Response to Comment No. 5-6

Television City has been an operating studio within the Project Site since 1952, and will continue to operate as a studio upon completion of the Project. Refer to Topical Response No. 3, Permitted On-Site Uses. Specifically, as set forth on page II-10 of Section II, Project Description, of the Draft EIR, the underlying purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities to meet both the existing and unmet demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure and create a cohesive studio lot. As stated in Topical Response No. 3, Permitted On-Site Uses, Section III, Revisions, Clarifications, and Corrections to the Draft EIR, includes clarifications to Section II, Project Description, of the Draft EIR to provide a clarified list of five permitted studio related uses within the Project Site consistent with the underlying purpose of the Project: sound stage; production support; production office; general office; and retail. As discussed on pages IV.H-22 to IV.H-23 in Section IV.H, Land Use and Planning, of the Draft EIR, the Specific Plan would also allow ancillary sitewide uses, such as parking, communication facilities, childcare, fitness facilities, and facilities equipment and infrastructure, supporting the studio and the five permitted studio land uses. Ancillary facilities, such as childcare and/or fitness facilities, would be for use by on-site users and they would not be accessed separately by the public as an individual commercial tenant space. In addition, the text on page II-16 of Section II, Project Description, of the Draft EIR stating that permitted uses include “all other uses permitted in the C2 zone unless

expressly prohibited in the Specific Plan” has been deleted (even though these uses are currently permitted). A use, such as an auditorium sports arena open to the public, would not be permitted within the Project Site. Impacts associated with all uses permitted under the proposed Specific Plan have been fully evaluated in the EIR. With regard to special events, refer to Topical Response No. 3, Permitted On-Site Uses.

Comment No. 5-7

It is also unclear in the Draft EIR how much is actually going to be built. The Draft EIR makes clear the applicant is changing the definition of how the City measures permitted floor area. The Project’s website shows what appears to be lower-level areas with people working at these levels. By moving production areas below grade (and in parking areas) and redefining floor area, the Draft EIR failed to study the environmental impacts from these uses.





Response to Comment No. 5-7

As stated throughout the Draft EIR, the proposed Specific Plan would permit a maximum total of 1,874,000 square feet of floor area. Floor area is first defined on page II-1 in Section II, Project Description, of the Draft EIR. As also first stated on page II-1 of the Draft EIR, “[t]he proposed approximately 1.874 million square feet of floor area per the Specific Plan definition is equivalent to approximately 1.984 million square feet based on the LAMC definition and approximately 2.103 million gross square feet.” Thus, the Draft EIR disclosed the total floor area under both the proposed Specific Plan and LAMC definitions.

The Project’s proposed definition of floor area does not understate the environmental impacts of the Project. As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, the Project’s definition of floor area included in Section II, Project Description, of the Draft EIR, and in the proposed Specific Plan is based on the LAMC definition, with a few additional clarifications to account for the unique nature of studio uses and functions, as was done in the Paramount Pictures Specific Plan (Ordinance No. 184,539), which is the most recent and direct precedent for this Project. Areas shown within the Conceptual Site Plan that are dedicated to the Mobility Hub and basecamp areas are appropriately excluded from the Project definition of floor area. LAMC Section 12.03 specifically excludes “parking areas with associated driveways and ramps” from the definition of floor area. The Mobility Hub components are equivalent to “parking areas” where people can access various modes of transportation. Accordingly, the

exclusion of the specific term Mobility Hub from the definition of floor area in the Draft EIR and the proposed Specific Plan provides definitional clarity and is added for transparency of planning and regulatory compliance. The basecamp areas provide for a variety of uses that are ancillary to and necessary for production activities in a studio and include loading, wardrobe, hair, make-up, craft service, parking, and storage of mobile facilities and support vehicles (such supportive services are temporary and mobile). A significant portion of the subterranean basecamp would be used for storage of mobile facilities and support vehicles. These basecamp areas would also provide access, staging, storage, and connectivity between active production and supporting uses, as well as space for production staging, loading, and emergency vehicle access throughout the Project Site. Thus, the basecamp activities are consistent with the elements that are excluded from the floor area definition under LAMC Section 12.03.

Also note that, while outdoor production activities may occur above-grade, no active production activities or uses would be located in the parking and basecamp areas below Project Grade. Refer to Figure II-4(c) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. This is consistent with the renderings included in the comment, which show below-Project Grade basecamp areas and above-Project Grade production activities.

Comment No. 5-8

The applicant is seeking to change the Wilshire Community Plan land use designations for the TVC 2050 Project. Why doesn't the Draft EIR include any discussion of the potential impacts from the proposed General Plan amendment to change from Community Commercial, Limited Commercial, and Neighborhood Commercial to Regional Center? The current land use designations would permit less development than proposed. This change is a major shift in the character of the community.

Response to Comment No. 5-8

As stated on page 29 of the Initial Study published on July 2, 2021 (Appendix A of the Draft EIR), and on page II-36 of the Draft EIR published on July 14, 2022, the Applicant is requesting, among other Project approvals, a General Plan Amendment to change the General Plan land use designations from Community Commercial, Limited Commercial, and Neighborhood Commercial to a unified Regional Center Commercial land use designation; assign a Regional Center Commercial land use designation to an approximately 0.63-acre portion of the Project Site located in unincorporated Los Angeles County to be annexed to the City of Los Angeles; and allow the TVC zone as a corresponding zone to the Regional Center Commercial designation pursuant to LAMC

Section 11.5.6.^{96,97} As set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the requested land use designation change is to a “Regional Commercial” land use. The Applicant is requesting the Regional Commercial designation to accurately align the function of the Project Site with the appropriate General Plan land use designation. Pages IV.H-43 and IV.H-44 in Section IV.H, Land Use and Planning, of the Draft EIR address the proposed General Plan Amendment to change the General Plan land use designations to a unified Regional Commercial land use designation, rather than the three different land use designations covering portions of the Project Site today. As demonstrated therein, unifying the General Plan designations for the Project Site to Regional Commercial is consistent with the applicable policies in the General Plan.

More specifically, in the Wilshire Community Plan, the “Regional Commercial” land use designation is one of the categories used to help differentiate types of commercial development. As identified in the Wilshire Community Plan, the “Regional” designation uses criteria identified within the City of Los Angeles General Plan Framework Element. As identified in Chapter 3 of the General Plan Framework Element, “Regional Commercial” land uses “contain a diversity of uses such as offices, retail [and] major entertainment facilities and supporting services,” which “typically provide a significant number of jobs”⁹⁸ and are “intended to serve as the focal points of regional commerce, identity, and activity.”⁹⁹ TVC’s function has been consistent with the Regional Commercial land use designation for over 70 years as the first purpose-built television studio and an icon for the entertainment industry, as well as a major component of the Beverly-Fairfax community’s identity. As such, the proposed Regional Commercial land use designation is appropriate for Television City. As discussed throughout the Draft EIR, the proposed Specific Plan would permit the development of up to 1,874,000 square feet of sound stages, production support, production office, general office, and retail uses, thereby creating thousands of new jobs and generating significant economic revenue during construction and operation.

The proposed Regional Commercial designation would not increase the size of the Project allowed under the requested entitlements; rather, a site’s permitted FAR and height are controlled by its zone and height district designations. Currently, an FAR of 1.5:1 is permitted by existing zoning, and the Project is requesting an increase to 1.75:1 (a

⁹⁶ Commenters refer to the term “Regional Center.” However, the correct term used in the Wilshire Community Plan is “Regional Commercial.”

⁹⁷ The Wilshire Community Plan states that there are four areas designated as Regional Commercial. The proposed General Plan Amendment will require a modification to the Regional Commercial description in the Wilshire Community Plan to identify a fifth Regional Commercial area.

⁹⁸ City of Los Angeles General Plan Framework Element, Chapter 3, Land Use.

⁹⁹ City of Los Angeles General Plan Framework Element, Chapter 3, Land Use.

0.25 increase in permitted FAR represents an approximately 17 percent increase over existing zoning).

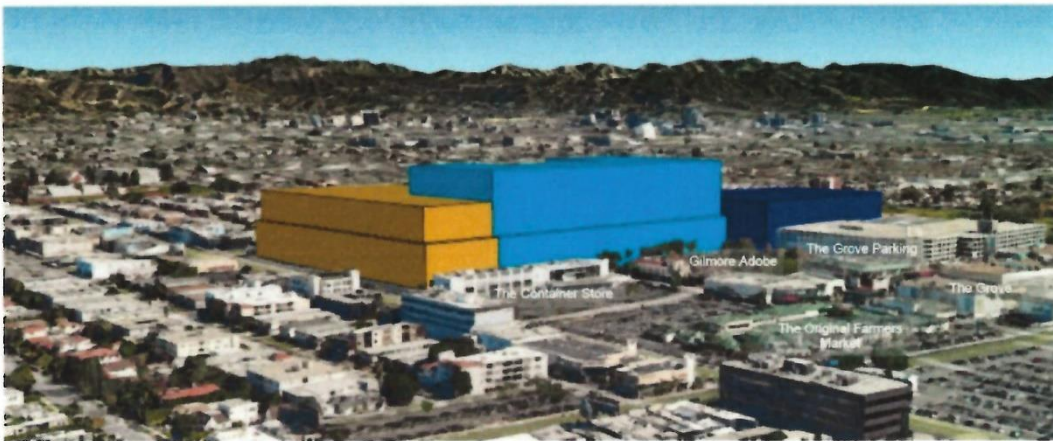
Notwithstanding, it should also be noted that the proposed 1.75 FAR for the Project Site would also be consistent with the existing Community Commercial, Limited Commercial, and Neighborhood Commercial designations. As mentioned above, General Plan land use designations do not determine floor area. Rather, these designations determine the types of zoned uses which inhabit a specific geography. Therefore, the designation of the Project Site as either Community Commercial, Limited Commercial, or Neighborhood Commercial does not change or modify the Project Site's studio use.

Per the General Plan Framework Element, "[g]enerally, regional centers will range from FAR 1.5:1 to 6:1." The lower end of this general FAR range is consistent with the proposed FAR of 1.75:1. As demonstrated in the analysis provided on pages IV.H-39 through IV.H-57 of Section IV.H, Land Use and Planning, of the Draft EIR, and in the detailed land use policy tables included as Appendix I to the Draft EIR, the size and scale of the Project would not conflict with any applicable land use plans and policies, including those that specifically address compatibility with surrounding land uses, and the Project would not result in a major shift in the character of the community. The proposed Regional Commercial land use designation is appropriate for Television City, a studio campus that would generate thousands of jobs for the City.

To the south of the Project Site, The Original Farmers Market has operated at its location since 1934. As noted by the Zoning Administrator in City Planning Case No. ZA-1999-0318-CUB-CUZ-ZV-YV, The Original Farmers Market is "a Los Angeles landmark, which draws tourists to the area from not only California and the nation, but also from other international points." The subsequent development and operation of The Grove, in accordance with the Zoning Administrator's 1999 approval of this case, have demonstrated its symbiotic relationship with The Original Farmers Market as well. Thus, properties in the vicinity of the Project Site have already been developed with uses consistent with a Regional Commercial designation regardless that those properties retain a Community Commercial designation.

Comment No. 5-9

To provide a sense of the project in the context of the community, below is a height model showing the heights of the TVC 2050 project. Note: this is not a massing model. Part of the issue with the Draft EIR is that there is no visual representation of this Project or clarity on what the Project is. Below is a 3D model of the projected height zones in reference to the community.



Shouldn't the City provide an analysis of the potential impacts from the proposed General Plan amendment? Shouldn't the City include a representative model that actually represents the heights of what might be built?

Response to Comment No. 5-9

The height zones represented within the illustrations included in this comment are inaccurate and do not portray what would be allowed under the proposed Specific Plan. Refer to pages II-17 through II-20 of Section II, Project Description, of the Draft EIR for a detailed description of the proposed height zones, including Figure II-5, Height Zone Map, which are the same as the height zones included in the Preliminary Draft Specific Plan. As detailed therein, Height Zones C and D are subject to a base height limit of 88 feet. Height Zone C allows a maximum height of 160 feet within up to 40 percent of the Height Zone C area, not the entirety of the area as depicted in this comment. Similarly, the 225-foot maximum height limit within Height Zone D is only allowed within 40 percent of this height zone, not the entirety of the area as depicted in this comment. Refer to Figure II-4 through Figure II-6 on pages II-244 through II-246 under Response to Comment No. 5-5 for diagrams of Height Zones C and D and to Figures II-4(a) and II-4(b) within Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for aerial renderings depicting the Conceptual Site Plan. In addition, the images in this comment do not appear to demonstrate that building heights within Height Zone A would be limited to 58 feet or accurately depict the historic viewshed corridor restriction set forth in Project Design Feature CUL-PDF-1 and in the proposed Specific Plan that codifies an existing regulation set forth in the historic-cultural monument (HCM) designation for the Project Site. Also note that the illustrations within this comment do not appear to depict the required frontage areas, including, among others, the 30-foot frontage areas between the Broadcast Center Apartments and Project buildings. Refer to Response to Comment No. 5-8 regarding the proposed General Plan Amendment to change the General Plan land use designations to a unified Regional Commercial land use designation, which was fully studied in the Draft EIR.

Comment No. 5-10

The TVC 2050 Project is requesting 31,000 square feet of signage at the perimeter of the Property and unlimited interior signage without further explanation. Very little information is provided regarding the size, scale, type and placement of the proposed signage. How can the community and the Draft EIR evaluate the proposed signage without this information?

Response to Comment No. 5-10

Pages II-30 through II-32 of Section II, Project Description, of the Draft EIR, and pages IV.H-30 through IV.H-31 of Section IV.H, Land Use and Planning, of the Draft EIR, provide a description of proposed signage within the Sign District, including types of signs; maximum signage along Fairfax Avenue, Beverly Boulevard, and The Grove Drive; limitation of signage along the Project's Shared Eastern Property Line adjacent to the Broadcast Center Apartments; limitations on interior signage above 88 feet; illumination requirements pursuant to the LAMC; and prohibited signage. As stated in therein, the proposed Sign District would not conflict with the standards and goals of the Historic Sign

Guidelines for the Primary Studio Complex (included as Appendix C.4 of the Draft EIR). Also refer to the revised Proposed Signage Plan included in revised Figure II-10 of Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and to Figure II-7 on page II-256 for an illustration of potential interior digital display locations. The proposed draft signage plans were submitted to the Department of City Planning as a part of the Sign District application. Additional details regarding the proposed signage is included in this Final EIR in response to public comments; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

As set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, operation of outdoor digital displays in the Project Site interior would be prohibited within 200 feet of the Broadcast Center Apartments between the hours of 10 p.m. and 7 a.m.

As discussed on page 20 of the Land Use Plans Consistency Analysis Tables included as Appendix I to the Draft EIR, Project signage would be integrated with and complement the overall aesthetic character of on-site development. It should be noted that CEQA and City policy do not require the proposed Sign District to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website. The proposed Sign District is fully consistent with the description in the Draft EIR. Please note that, pursuant to Public Resources Code Section 21099 (SB 743), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and, therefore, do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.



LEGEND

- BOUNDARY OF PROJECT INTERIOR SIGNS ¹
- SITE INTERIOR FACADES SUITABLE FOR DIGITAL SIGNAGE
- POTENTIAL DIGITAL SIGNAGE LOCATIONS
- 200' MULTI-FAMILY BUFFER ²

¹ AS SHOWN IN FIGURE II-10, PROPOSED SIGNAGE PLAN, OF THE DRAFT EIR

² OPERATION OF OUTDOOR DIGITAL SIGNAGE WILL BE PROHIBITED WITHIN 200 FEET OF THE EXISTING MULTI-FAMILY USE LOCATED TO THE NORTHEAST OF THE PROJECT SITE BETWEEN THE HOURS OF 10 P.M. AND 7 A.M.

NOTE:

- DIGITAL DISPLAYS WILL NOT BE PERMITTED ON THE PROJECT EXTERIOR
- ALL SIGNAGE ABOVE 88 FEET ABOVE PROJECT GRADE WILL BE LIMITED TO A MAXIMUM SIGN SIZE OF 300 SQUARE FEET AS STATED ON PAGE IV-H-31 OF THE DRAFT EIR

Figure II-7
Potential Interior Digital Signage Locations

Comment No. 5-11

The parking, trip generation and VMT numbers don't add up based on the projected uses and square footage of the TVC 2050 Project. For example, did the City evaluate the parking, trip generation and VMT numbers based on the projected use of the studios as audiences stages. If all or a high percentage of the stages are available for audience shows, that could add thousands of trips to the Project and the need for thousands of parking spaces not currently anticipated to be provided. Did the City consider that use in its analysis? The Draft EIR says the transportation analysis was a "worst case" analysis? But is it a worse case analysis, if it fails to include significant expansion of the primary use of the existing stages today? Please explain why many permitted uses which have different trip generation rates were not analyzed. Also why wasn't real world data provided by the existing Project site?

Response to Comment No. 5-11

Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the parking supply to accommodate the peak parking demands of the Project, including demand associated with visitors, including audiences.

Contrary to the statement by the commenter, the parking, trip generation and VMT numbers account for the Project's uses and square footage. With regard to parking, as discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces based on the proposed parking ratios set forth for all of the Project's proposed uses. With regard to trip generation, as shown in Table 6 on page 81 of the Transportation Assessment (Appendix M.1 of the Draft EIR), all of the Project's uses and square footage have been accounted for in the trip generation calculations. Similarly, with regard to VMT, Table IV.K-4 on page IV.K-74 in Section IV.K, Transportation, of the Draft EIR showed that all of the Project's uses and square footage have been accounted for in the VMT analysis. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding how visitor trips, including audiences, have been fully accounted for in the Transportation Assessment. As discussed therein, the number of sound stages used for audience shows has been assumed to increase over the existing level of audience shows and the trip generation numbers reflect that increase in audience shows. See Table II-6 in Section B, Visitor Trips, of Topical Response No. 10 for a comparison of existing and future audience member trips.

The comment asks why the "many permitted uses which have different trip generation rates were not analyzed." There are not "many permitted uses" that would be allowed on the Project Site. The Specific Plan would limit the permitted land uses to those analyzed in the Draft EIR (i.e., sound stage, production support, production office, general office, and retail), and the transportation analysis accounts for all permitted land uses,

including audience sound stages and the projected growth in audience sound stages. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the proposed Land Use Exchange Program. As discussed in Topical Response No. 8, Vehicle Miles Traveled, the Draft EIR analyzed both the Conceptual Site Plan, as well as the land use exchange scenarios that would generate the maximum potential transportation impact, and, thus, the Draft EIR analyzed and disclosed the full range of potential transportation impacts associated with the Project.

With regard to the use of real-world data, refer to page IV.K-24 of the Draft EIR for a discussion of the existing traffic volumes that were obtained in 2019 for the Project vicinity. Also, refer to Section A, Empirical Data, of Topical Response No. 10, Trip Generation, regarding the collection of empirical data from other Los Angeles studios and its comparison to the trip generation rates used in the analysis in consultation with LADOT. The use of the rates in question, based on empirical trip generation data developed at different studio campuses in Los Angeles, was valid and consistent with LADOT and CEQA policy and precedent. In terms of existing traffic data for the Project Site, new traffic counts were conducted at the Project driveways and compared to the trip rates used in the Transportation Assessment analysis. Appendix FEIR-5 of this Final EIR presents the actual traffic counts at the Project driveways.

Comment No. 5-12

We also do not understand how many construction trucks will be required to build this Project. Please provide a comprehensive table showing how many trucks are required including dump trucks, concrete trucks, trucks to deliver steel, rebar, building materials, HVAC and MEP equipment, glass and masonry, etc. The Draft EIR says the Project will be built either in 3 years or 20 years. Why wasn't an analysis impacts provided showing what happens if it takes 20 years to build the Project?

Response to Comment No. 5-12

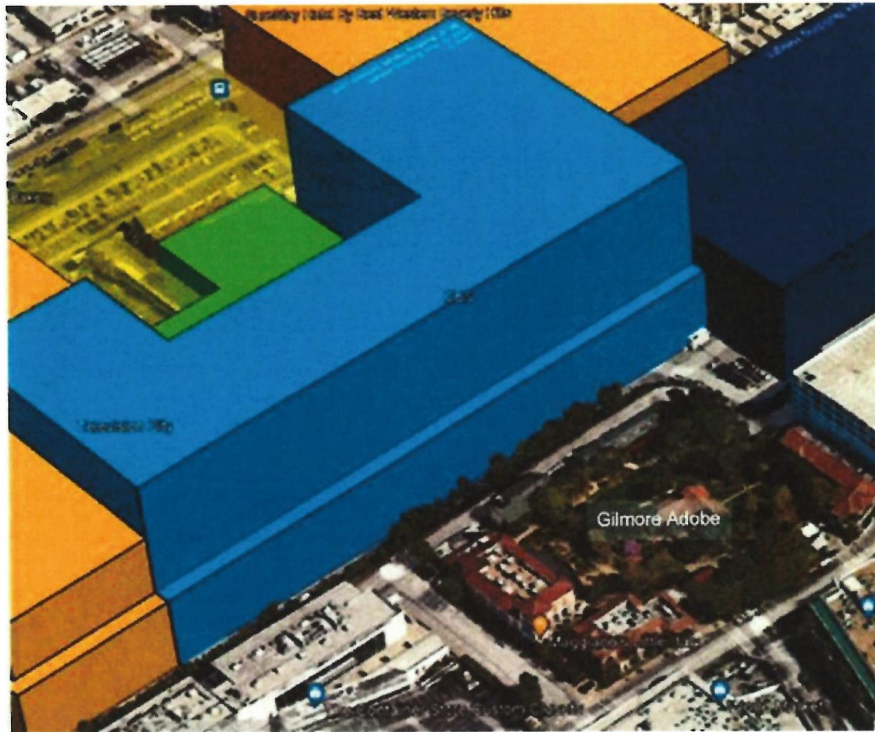
Refer to Table II-21 of Topical Response No. 14, Construction Vehicle Impacts, which provides a comprehensive summary of the number of construction trucks required during each subphase of construction, including haul trucks, concrete trucks, and delivery trucks under a 32-month construction schedule. In terms of the requested breakdown of the function of trucks (e.g., what specific materials is each truck delivering), this specificity is not necessary. The number of trucks per construction phase and the size of those trucks are the factors important to the evaluation of the effects of trucks on the roadway system. These details are known and were included in the analysis of truck effects.

As stated throughout the Draft EIR, while Project buildout is anticipated in 2026, the Applicant is seeking a Development Agreement with a term of 20 years, which could

extend the full buildout year to approximately 2043. Accordingly, the Draft EIR analyzed the Project's impacts associated with a long-term buildout for each of the 13 environmental impact areas analyzed in Section IV of the Draft EIR. With the exception of impacts to air quality, impacts under a long-term buildout scenario would be the same or less than the impacts under the anticipated 32-month construction timeline. With a long-term buildout and operation of some facilities on-site while construction is occurring, only a single excavation operation could be accommodated onsite, thus reducing the excavation activities and associated haul truck trips by half. A single excavation operation would only result in half the number of pieces of equipment operated and result in approximately 300 daily haul truck trips instead of approximately 600 trips. Other construction activities, such as building construction and finishing, would likely occur at a further reduced level but were still assumed to occur at 50 percent of the maximum daily intensity. Regardless, the maximum construction air quality impacts would occur during the excavation subphase. As shown on pdf page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the mat pour foundation subphase could require up to five concrete pour days for mat foundations and up to 1,000 concrete truck trips which would occur under both the 32-month construction schedule and the long-term buildout scenario. As discussed on page IV.A-75 in Section IV.A, Air Quality, of the Draft EIR and in Appendix FEIR-8, Details of Project Buildout and Construction, of this Final EIR, under a long-term buildout scenario, construction activities, including truck trips, were conservatively assumed to occur at approximately 50 percent of the maximum daily intensity as would occur during the 32-month schedule, with the exception of mat pour activities which were assumed to be the same as under the 32-month schedule. These assumptions were used to evaluate the potential environmental impacts associated with long-term buildout of the Project throughout the Draft EIR. Refer to Response to Comment No. 9-24, below, for further discussion.

Comment No. 5-13

The Draft EIR virtually ignores one of the most significant historical resources in the area—the Gilmore Adobe that dates back to the early 1800's. [sic] The failure to analyze the potential impacts to the Gilmore Adobe and Original Farmers Market is perplexing. These two historic assets of the City are critically important and the Draft EIR barely discusses the Project's potential impacts to these resources. The proposed project's 225-foot buildings directly adjacent to these historic properties will overwhelm and overshadow them. Below is a visual of the height of the Project as compared to the Adobe and Farmers Market. Why was this not analyzed?



Response to Comment No. 5-13

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Gilmore Adobe (also referred to as the Rancho La Brea Adobe) and The Original Farmers Market.¹⁰⁰ The Gilmore Adobe, located approximately 167 feet from the nearest Project buildings and approximately 125 feet from the nearest construction activities within the Project Site, and separated from the Project Site by one- and two-story support buildings and an approximately 28-foot-wide service alley, is the closest of the five historical resources identified in the vicinity to the Project Site. The Original Farmers Market buildings, clustered at the northeast corner of 3rd Street and Fairfax Avenue, are further separated from the Project Site by interstitial commercial buildings and a surface parking lot.

This comment incorrectly states that the Draft EIR failed to analyze impacts to the Gilmore Adobe and The Original Farmers Market. The Draft EIR fully and adequately analyzed potential impacts to historical resources in the Project Site Vicinity, including the Gilmore Adobe and The Original Farmers Market, in Section IV.B, Cultural Resources, and Appendix C.1 (Historic Report) of the Draft EIR. The Gilmore Adobe and The Original Farmers Market are discussed on pages IV.B-27 to IV.B-29 of the Draft EIR and pages 39

¹⁰⁰ Both Gilmore Adobe and Rancho La Brea Adobe refer to the same structure. This document uses Gilmore Adobe throughout.

to 40 of the Historic Report, and potential impacts to these historical resources are discussed on page IV.B-55 of the Draft EIR and pages 87 to 88 of the Historic Report. As stated on page 88 of the Historic Report:

The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of either The Original Farmers Market or the Rancho La Brea Adobe. Both the Original Farmers Market and the Rancho La Brea Adobe would remain unchanged after implementation of the Project, and the Project would not result in adverse impacts to either resource.

Integrity of setting for both resources has been substantially altered previously by the construction of The Grove shopping and entertainment center in 2002, and neither The Original Farmers Market nor the Rancho La Brea Adobe retains integrity of setting. The Project would not affect the integrity of location, design, materials, workmanship, or association of The Original Farmers Market or the Rancho La Brea Adobe. Both of these resources would remain intact in their current locations and would not be materially altered by new construction in its immediate surroundings. Therefore, integrity of feeling would also remain unaffected because all of the existing physical elements that characterize The Original Farmers Market and the Rancho La Brea Adobe would continue to convey their historic significance. All of the aspects of integrity for both The Original Farmers Market and the Rancho La Brea Adobe would be unaffected by the Project, and the historic integrity of both resources would be retained (with the exception of setting, which is no longer intact since construction of The Grove). After construction of the Project, The Original Farmers Market and Rancho La Brea Adobe would remain intact and continue to convey their historic significance. For these reasons, the historic significance and integrity of The Original Farmers Market and Rancho La Brea Adobe would not be materially impaired by the Project. [emphasis added]

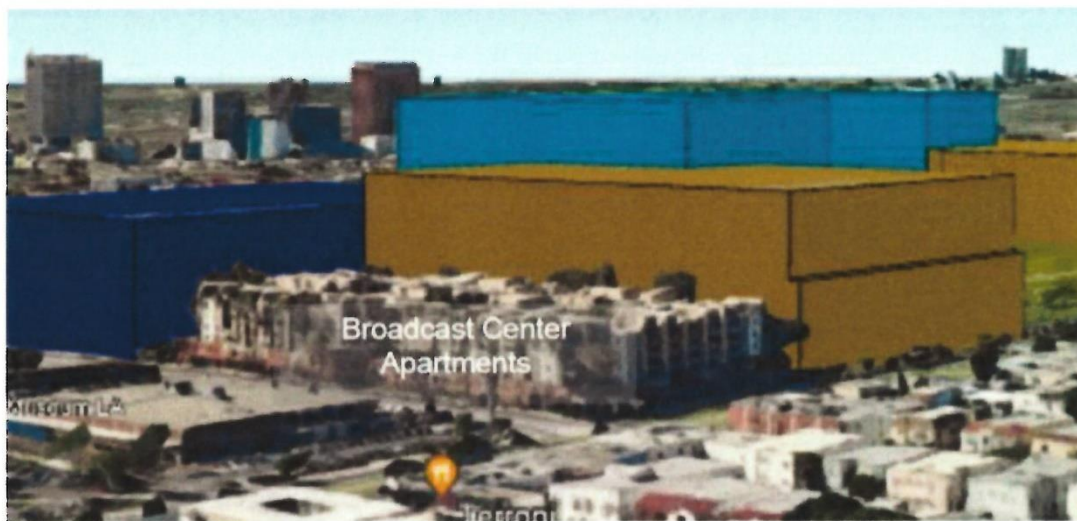
The massing model included in this comment is inaccurate and does not portray what could be built in the southern portion of the Project Site under the proposed Specific Plan. As discussed on pages II-17 to II-20 and shown in Figure II-5 on page II-18 in Section II, Project Description, of the Draft EIR, the proposed Specific Plan would establish height zones with maximum height limits across the entire Project Site (there is currently no height limit under the existing zoning). As stated therein, Height Zone D, which is located in the central/southern portion of the Project Site, would limit building heights to a maximum of 88 feet, consistent with the height of the existing Primary Studio Complex. In addition, the Specific Plan would permit heights up to a maximum of 225 feet in up to 40 percent of the Height Zone D area, not 100 percent of Height Zone D as depicted in the comment. A diagram that shows the maximum height area is included next to the Height Zone Map in

Figure II-5 of the Draft EIR. Also refer to the three-dimensional diagram of Height Zone D in Response to Comment No. 5-5 and the Conceptual Site Plan rendering in Figure II-4(b) of Section III, Revisions, Clarifications and Corrections to the Draft EIR that shows the location of the Gilmore Adobe relative to the Project. The closest on-site building would be located approximately 167 feet from the Gilmore Adobe. In addition, the massing model included in this comment does not appear to account for the full 30 foot frontage along the southern property line that would be required under the proposed Specific Plan, which would separate new buildings from adjacent properties to the south. The height zone and frontage requirements discussed in the Draft EIR are the same as those included in the Preliminary Draft Specific Plan, which has been made publicly available for informational purposes prior to the release of this Final EIR on the Department of City Planning's website. Please note that this draft is not final and has not been approved by City decision-makers. Also refer to Figure 11, New Construction Adjacent to Primary Studio Complex, on page 73 of the Historic Report for an accurate depiction of the massing of the Conceptual Site Plan (the areas closest to the Gilmore Adobe).

In addition, Section IV.I, Noise, of the Draft EIR also analyzed potential impacts from vibration on the historical resources in the Project Site vicinity, including the Gilmore Adobe and The Original Farmers Market. As demonstrated in the analysis provided on page IV.I-60 of the Draft EIR, potential vibration impacts on these historical resources would be less than significant.

Comment No. 5-14

The impact to the Broadcast Center Apartments would be significant. The TVC project is reserving the right to build a 160-foot building to the east and 130-foot building to the south of the apartments. How can the impacts to these residences not be fully analyzed?



Response to Comment No. 5-14

This comment does not include any evidence to support the assertion that impacts to the Broadcast Center Apartments were not fully evaluated in the Draft EIR. The potential environmental impacts to the Broadcast Center Apartments were thoroughly analyzed throughout the Draft EIR and in the Initial Study included as Appendix A to the Draft EIR. For example, Section IV.I, Noise, of the Draft EIR considers building height in the evaluation of outdoor noise. The Draft EIR analyzed impacts related to land use and planning in Section IV.H, Land Use and Planning, of the Draft EIR in accordance with Appendix G of the CEQA Guidelines, which focused on the potential to divide an established community or conflict with an established plan or policy, and impacts were demonstrated to be less than significant. Also refer to Response to Comment No. 5-9 regarding the noted inaccuracies with the illustration provided in this comment, including the fact that it does not appear to depict any of the required frontage areas, including, among others, the 30-foot frontage areas between the Broadcast Center Apartments and Project buildings. Please note that the Project would be developed to the west, rather than the east, of Broadcast Center Apartments. Furthermore, as discussed in Response to Comment No. 5-10, pursuant to Public Resources Code Section 21099 (SB 743), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

Comment No. 5-15

There is nothing in the Draft EIR to let the public know if the applicant is required to build the sound stages. Or at the end of the day, will the community just get office and warehouses? What is the relationship of what will be built when?

Response to Comment No. 5-15

As discussed in Response to Comment No. 5-6, the underlying purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities to meet both the existing and unmet demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. As discussed in Topical Response No. 1, Clearly Defined Description and Specific Plan, Topical Response No. 3, Permitted On-site Uses, and Response to Comment No. 5-6, the proposed Specific Plan would allow five studio land uses: sound stage, production support, production office, general office, and retail (only a limited amount of neighborhood serving retail uses). Sitewide ancillary uses that support the studio and the five land uses would also continue to be permitted within the Project Site. Table II-2 and page II-16 of Section II, Project Description, of the Draft EIR describe the maximum amount of floor area that would be permitted for each of these studio-related land uses. Contrary to this comment, warehouse uses would not be permitted; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Also, as discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, and future changes that are substantially different than the Project would require additional discretionary City review and approval, as well as CEQA compliance review. See the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website.

Regarding the construction timeline, refer to Response to Comment No. 9-24.

Comment No. 5-16

There are hundreds of other questions about this Draft EIR and the proposed Project. Unfortunately, the Draft EIR does not meet the requirements of CEQA or serve as an information document for the community. The Draft EIR should be withdrawn, and the process restarted with a clearly defined revised project.

Response to Comment No. 5-16

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-2 through 5-15, the Draft EIR has been prepared in full compliance with CEQA and fulfills CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the potential environmental impacts of the Project. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 6

Brissa Sotelo-Vargas
BizFed Chair
Los Angeles County Business Federation
6055 E. Washington Blvd., Ste. 1005
Commerce, CA 90040-2439

David Fleming
BizFed Founding Chair
Los Angeles County Business Federation
6055 E. Washington Blvd., Ste. 1005
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Tracy Hernandez
BizFed Founding CEO
Los Angeles County Business Federation
6055 E. Washington Blvd., Ste. 1005
Commerce, CA 90040-2439

Comment No. 6-1

On behalf of the Los Angeles County Business Federation (BizFed), a grassroots alliance of more than 215 diverse business groups mobilizing 410,000 employers in Los Angeles County, we wish to express our support of the Environmental Impact Report relating to the proposed TVC 2050 Project (Project).

We are excited that the Project will represent a \$1.25 billion investment in Television City, one of Los Angeles' most iconic studios. This includes more than 4,000 jobs during construction and over 18,000 jobs during operations. Additionally, the project will feature modern sound stages, production offices, an enhanced public-pedestrian experience, supportive retail, and a new, multi-modal Mobility Hub.

For nearly 70 years, Television City has played an integral role in the entertainment industry. The Project will ensure that Television City remains a premier production studio that continues to attract top talent and media creators, thereby keeping production activities and jobs in Los Angeles.

We respectfully request approval of the Project so that it may move forward to promote local and regional economic growth and maximize tax and property revenues to the City.

Thank you for your consideration. If you have any questions, please don't hesitate to contact our BizFed Policy Manager Chris Wilson at (562) 201-6034 or chris.wilson@bizfed.org.

Attachment—BizFed Association Members

Response to Comment No. 6-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 7

Susan Ferris
Bohemia Group
7471 Melrose Ave., Ste. 1
Hollywood, CA 90046-7551

Comment No. 7-1

When I learned about the plans for Television City, I was glad to hear that something was going to be done to reinvigorate that historic studio lot. After opening its gates 70 years ago, the industry and its technology has evolved to the point where the studio is very much in need of modernization.

The TVC 2050 project will allow Television City to meet the growing demand for production space in Los Angeles. Construction of modern, purpose-built sound stages will increase production capacity. The project also includes studio office space, designed to serve creative content creators and to support the production process.

If Los Angeles is to remain a viable production center, we need to ensure that projects like this move forward through the approval process. I hope that that will be the case, since the Draft Environmental Impact Report indicated that there were no significant impacts found during the operation of the studio and only a couple of impacts during the construction phase.

This is an exciting project that will have a long-lasting impact on the entertainment industry.

Response to Comment No. 7-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 8

Lupe Aldaco, Jr.
President
Bricklayers & Allied Craftworkers Local 4
2679 Sierra Way
La Verne, CA 91750-5642

Comment No. 8-1

On behalf the Bricklayers & Allied Craftworkers [sic] the Local #4 union enthusiastically supports TVC 2050: The Los Angeles Studio Plan.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying construction jobs. Television [sic] City has agreed to employ union construction [sic] workers for the project which means new job opportunities [sic] for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 8-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 9

Amy Minter
Chatten-Brown, Carstens & Minter LLP
2200 Pacific Coast Highway, Ste. 318
Hermosa Beach, CA 90254-2702

Sunjana Supekar
Chatten-Brown, Carstens & Minter LLP
2200 Pacific Coast Highway, Ste. 318
Hermosa Beach, CA 90254-2702

Comment No. 9-1

On behalf of Save Beverly Fairfax, we provide the following comments on the draft environmental impact report (DEIR) for the Television City 2050 Specific Plan project (the “Project” or TVC 2050 Project). We also join in the comments provided by the Beverly Wilshire Homeowners Association.

Response to Comment No. 9-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 9-2

Save Beverly Fairfax is a volunteer organization of neighborhood owners, residents and preservation advocates in the Beverly Fairfax Historic District (“Historic District”) advocating for the protection of the architectural and cultural history of this historic neighborhood. Save Beverly Fairfax led the successful effort to list this historic neighborhood, on the National Register of Historic Places as a National Register Historic District. The Historic District, roughly bordered by Beverly Boulevard to the south, Melrose Avenue to the north, Fairfax Avenue to the west and Gardner Street to the east, is deeply rooted in Jewish American history and boasts a collection of largely intact Period Revival homes. The Project’s location at 7716–7860 West Beverly Boulevard is adjacent to and directly south of the Historic District. For this reason, Save Beverly Fairfax is deeply concerned with the design and development of this Project which could adversely impact this important historic neighborhood.

Response to Comment No. 9-2

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. However, it should be noted that the Project Site is not “adjacent to” the Beverly Fairfax Historic District as incorrectly claimed in this comment. The northern edge of the Project Site is located over 200 feet from the southern boundary of the Beverly Fairfax Historic District. The Project Site is separated from the Beverly Fairfax Historic District by Beverly Boulevard, as well as the commercial buildings on the north side of Beverly Boulevard.

Comment No. 9-3

The TVC 2050 Project is intended to establish the TVC 2050 Specific Plan to modernize and expand production facilities within the 25-acre Television City site. The Project also proposes to approve a general plan amendment for the Project site to Regional Center Commercial, which would allow for significant increases in the amount of allowable development at the site. The Project also proposes the adoption of a Sign District for the Project site, opening the site to an expanded amount of signage and the ability to expand signage even further in the future.

Response to Comment No. 9-3

As discussed in Response to Comment No. 5-8, the proposed Regional Commercial designation for the Project Site would not result in an increase in the amount of allowable development at the Project Site.

Refer to Response to Comment No. 5-10 regarding the proposed Sign District. All future signage would be implemented in accordance with the regulations of the Sign District and Historic Sign Guidelines (Appendix C.4 of the Draft EIR) and would be consistent with the description provided in the Draft EIR. Expansions of signage beyond that set forth in the Sign District would require a discretionary approval and additional CEQA compliance review.

Comment No. 9-4

The DEIR prepared for the Project is wholly inadequate because the Project it is intended to analyze—the TVC 2050 Specific Plan—has yet to be prepared. Without a defined Specific Plan, the DEIR is attempting to review a project that does not yet exist. This falls short of CEQA’s requirement to commence environmental review late enough in the process to provide meaningful information regarding the Project’s impacts. (Cal. Code Regs., tit. 14 (“CEQA Guidelines”) § 15004, subd. (b).) Though we urge the City to reject this Project altogether as proposed in the DEIR, if the City decides to move forward with

this Project, the DEIR must be recirculated once a fully formed draft Specific Plan is available and can be reviewed by the City, the public, and decisionmakers.

Response to Comment No. 9-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 regarding the fact that a draft Specific Plan was not required to be included as part of the Draft or Final EIR, the physical aspects of the proposed Specific Plan are fully accounted for in Section II, Project Description, of the Draft EIR and in the associated impact analyses throughout the Draft EIR, and environmental review is not premature. Although not required by CEQA, in response to comments on the Draft EIR and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website.

With regard to recirculation, CEQA requires the recirculation of a draft EIR for additional public comment "[w]hen significant new information is added to an environmental impact report after notice has been given..." (Pub. Resources Code, § 21092.1). CEQA Guidelines Section 15088.5 provides further definition to the phrase "significant new information." That statutory term is defined to include the following scenarios:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines Section 15088.5, subd. (a)(1)-(4).)

Consistent with CEQA Guidelines Section 15088.5, the courts have held that "[n]ew information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (*Laurel Heights Improvement Assn. v. Regents of University of California*

(1993) 6 Cal.4th 1112, 1129.) Recirculation is not required when the changes merely clarify, amplify, or make insignificant modifications to an adequate EIR.

Based on the facts and analyses contained in this Final EIR for the Project, including the comments received on the Draft EIR and the responses to those comments, there is no substantial evidence that (1) a new significant environmental impact would result from the Project or from a new mitigation measure that was not analyzed in the Draft EIR, (2) a substantial increase in the severity of an environmental impact would result from the Project that was not analyzed in the Draft EIR, or (3) the Applicant declined to adopt a feasible project alternative or mitigation measure considerably different from others previously analyzed that would lessen the significant environmental impacts of the Project.

Further, CEQA Guidelines Section 15088.5(a)(4) requires recirculation of a draft EIR if “the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” (*Mountain Lion Coalition v. Fish & Game Comm.* (1989) 214 Cal.App.3d 1043.) Following the holding in *Mountain Lion Coalition*, courts have required recirculation of a draft EIR when an EIR wholly failed to evaluate an entire impact area. As detailed in this Final EIR, the Draft EIR did not omit the analysis of an entire impact area that has the potential for significant effects to the environment.

This comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 9-5

In addition to the lack of Specific Plan, the Project fails to meet CEQA’s requirements for an accurate, stable, and finite description of the Project. The Project Description’s failures mirror the violations of CEQA identified by the Court of Appeal in *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1.

Response to Comment No. 9-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description is accurate, stable, and finite and how the Project Description is distinguishable from the project description at issue in *Millennium* case. Refer also to Response to Comment Nos. 9-13 through 9-16 for a discussion of the differences between the Project and the *Millennium* project.

Comment No. 9-6

The Project also proposes a Sign District, but the EIR lacks information on the necessity and parameters of this Sign District, and fails to provide a draft Ordinance.

Response to Comment No. 9-6

Refer to Response to Comment No. 5-10 regarding the information provided in the Draft EIR regarding the proposed Sign District and the availability of the Preliminary Draft Specific Plan for public review. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all physical elements of the Sign District required by CEQA, and the Sign District is not necessary for the environmental analysis of the Project. Nevertheless, in response to comments and for informational purposes, a Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website.

Comment No. 9-7

The Project's traffic analysis is also inadequate. The DEIR fails to provide adequate information on parking and traffic hazards, relies on unsupported assumptions to assess vehicle miles traveled, improperly defers analysis of cut-through traffic, relies on project design features that improperly compress the DEIR's disclosure and analysis functions, and fails to disclose impacts to emergency response times.

Response to Comment No. 9-7

Contrary to the commenter's assertions, the transportation analysis in the Draft EIR was completed in full compliance with CEQA and was approved by LADOT.

Refer to page II-30 of Section II, Project Description, of the Draft EIR for a description of parking within the Project Site. Also refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the proposed parking supply to meet the peak demands of the Project and prevent spillover parking. Please note that, pursuant to SB 743, the adequacy of a new development's parking supply is not a consideration for evaluating a project's transportation impacts under CEQA. Assembly Bill (AB) 2097 is a new State law that prohibits public agencies and cities from imposing a minimum automobile parking requirement on most development projects located within a one-half mile radius of a major transit stop. This bill would apply to the Project Site. Accordingly, the parking provisions discussed in the Draft EIR that would be implemented under the proposed Specific Plan have been clarified to be the proposed parking ratios to meet the studio's peak parking demands.

With regard to traffic hazards, refer to Response to Comment No. 9-29.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the specific assumptions used in the Project's VMT analysis in the Draft EIR. These assumptions were reviewed and approved by LADOT.

With regard to cut-through traffic, a detailed analysis of cut-through traffic is provided in Section 5C (commencing on page 167) of the Transportation Assessment included as Appendix M.1 to the Draft EIR. As discussed in Topical Response No. 9, Neighborhood Traffic Management Plan, in particular the introduction and Section A, Deferred Mitigation, a project's effect on automobile delay (including neighborhood traffic) is not an environmental impact area under CEQA pursuant to SB 743 and, thus, the preparation of an NTMP as part of the Project does not represent deferred mitigation.

As discussed in Response to Comment No. 19-9, the Draft EIR does not improperly use PDFs. In addition, the transportation-related PDFs are consistent with the VMT Calculator and with the TDM requirements of the City, and these PDFs were approved by the Department of City Planning and LADOT.

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35, 26-147, and 35-134 regarding emergency response times.

Comment No. 9-8

Finally, the DEIR presents Alternative 2, a less impactful alternative. CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. Though we urge the City to reject this Project, should the City decide to move forward with this proposal, we support the adoption of Alternative 2 instead of the proposed Project.

Response to Comment No. 9-8

The commenter claims that Alternative 2 would avoid or substantially lessen the Project's significant effects. Refer to pages V-58 and V-59 of Section V, Alternatives, of the Draft EIR. As stated therein, Alternative 2 would not avoid or substantially reduce the Project's significant and unavoidable impacts with respect to Project-level and cumulative regional construction emissions; regional emissions associated with concurrent construction and operations; Project-level and cumulative on and offsite noise during construction; and Project-level onsite vibration and Project-level and cumulative offsite vibration (related to the significance threshold for human annoyance) during construction.

These impacts would continue to be significant and unavoidable under Alternative 2, although the duration of such impacts would be reduced due to the overall reduction in building footprint and associated construction activities.

Refer also to Topical Response No. 16, Project Alternatives Analysis, regarding the analysis of alternatives, including Alternative 2.

Comment No. 9-9

For these reasons, which are detailed below, we find the TVC 2050 Project DEIR to be wholly inadequate.

Response to Comment No. 9-9

As demonstrated in the responses to comments in this letter, the Draft EIR has been completed in full compliance with CEQA. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 9-10

I. The DEIR Fails to Provide Adequate Information and Documentation to Support Environmental Review.

A. Environmental Review is Premature Because There is No Draft Specific Plan.

As a preliminary matter, we object to the City's preparation of the EIR at this premature stage. The EIR purports to analyze the proposed TVC 2050 Specific Plan ("Specific Plan"). However, we were informed by the Department of City Planning that the Specific Plan is currently being drafted and not available for public review. Accordingly, the draft Specific Plan does not currently exist and thus was not provided to the public along with the EIR and its appendices.

The California Supreme Court has recognized that the timing of environmental review requires a balance between being early enough so that the information obtained can practically be used to guide decisionmakers, yet "late enough in the development process to contain meaningful information." (*Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 129.) Here, because the Specific Plan has not yet been drafted, the EIR is reviewing an inchoate project that is subject to change once the Specific Plan is finally drafted. The lack of a fully formed draft Specific Plan makes meaningful analysis of the Project impossible, because the EIR is analyzing potential impacts of a project that is not clearly formed.

Response to Comment No. 9-10

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the fact that a draft Specific Plan was not required to be included as part of the Draft or Final EIR and how the physical aspects of the proposed Specific Plan are fully consistent with Section II, Project Description, of the Draft EIR. Nevertheless, in response to comments and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website. As discussed in Topical Response No. 1, the assertion that the Specific Plan needs to be fully drafted prior to environmental review undermines CEQA's informational purpose coupled with the importance of public participation and feedback.

Comment No. 9-11

B. The Project Description Violates CEQA.

Every EIR must set forth a project description that is sufficient to allow an adequate evaluation and review of the project's environmental impacts. (CEQA Guidelines § 15124.) "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192 93; accord *San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.) "[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454.)

Here, the Project Description is unstable, not finite, and highly misleading, because it purports to review a Specific Plan that is not currently drafted and thereby cannot be presented to the public. Further, the Specific Plan provisions the EIR does attempt to review are vague and lead to an inordinate number of development possibilities for the Project. Further, the Project's timeline is also poorly defined and offers the public no information as to whether the Project will be built in three years or 20 years. These deficiencies serve as an "an obstacle to informed public participation" because the public and the decisionmakers cannot evaluate a project that lacks a concrete project proposal. (*Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 20 (*Millennium*).) For these reasons, which we detail below, the DEIR must be recirculated with an adequate Project Description that complies with CEQA.

Response to Comment No. 9-11

Refer Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 26-5 regarding how the Project Description is accurate, stable, and finite and the fact that the Specific Plan was not required to be included as part of the EIR. The proposed Specific Plan would include a regulatory framework for implementation of the Project. Future changes that are substantially different than the Project would require additional discretionary City review and approval, as well as CEQA compliance review. Also refer to Topical Response No. 1 regarding the limited Land Use Exchange Program that was fully evaluated in the Draft EIR and is consistent with the Preliminary Draft Specific Plan. As explained in Topical Response No. 1 and Response to Comment No. 9-13, the Project Description within the Draft EIR is distinguishable from the project description at issue in *Millennium*.

With regard to the Project timeframe, the Draft EIR conservatively assumed a 32-month construction duration that includes overlapping activities and construction phases and more intense activities on a daily basis. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

With regard to the *County of Inyo v. City of Los Angeles* case cited in this comment, it should be noted that the case also states that the project that is ultimately approved and built may deviate from the project description in the EIR, as the CEQA process “is not designed to freeze the ultimate proposal in the precise mold of the initial project,” and “new and unforeseen insights may emerge during [the environmental] investigation, evoking revision of the original proposal.”¹⁰¹

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA’s informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Thus, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

¹⁰¹ *East Sacramento Partnership for a Livable City v. City of Sacramento* (2016) 5 Cal. App. 5th 281 (quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193, 199). See also *Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1179-83 (where the approval of a revised project that was a variant of an alternative first included in the final EIR did not render the project description unstable, require recirculation, impede informed decision making, or prejudice the petitioners challenging the final EIR and project approval).

Comment No. 9-12**1. The Project Description is Unstable, Not Finite, and Misleading.**

The Project Description is unstable, not finite, and highly misleading, because as discussed above in Section I.A, the DEIR purports to review a draft Specific Plan that does not currently exist. The DEIR does not disclose this fact and is very unclear regarding the status of the Specific Plan, instead purporting to analyze standards and guidelines it claims are in or will be in the draft Specific Plan. A project description must contain a “general description of the project’s technical, economic, and environmental characteristics.” (CEQA Guidelines § 15124.) Without a valid project to describe, the DEIR cannot meet these requirements.

Further, an EIR’s project description may not rely on a conceptual impact envelope that merely provides a range of possible development scenarios. (*Millennium, supra*, 39 Cal.App.5th 1, 18.) In the highly relevant *Millennium* case, the Court of Appeal upheld a court order invalidating an EIR prepared by the City of Los Angeles that failed to describe a building development project, and only presented conceptual scenarios. (*Ibid.*) As detailed below, the City has unfortunately repeated that mistake here.

Instead of reviewing a concrete project proposal, the EIR purports to analyze a set of standards and guidelines proposed to be in the Specific Plan, such as a conceptual envelope of land uses, land use exchanges, height zones and other design elements, standards regarding rooftop terraces, signage, and parking, and haul routes. (DEIR, pp. II-12 to II-34.) None of these provide a stable or definite description of the Project. Stated herein are the components of the Project that we believe are vague and require further definition in order to meet the requirements of CEQA.

Response to Comment No. 9-12

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-13, and 26-5 regarding how the Project Description provided in Section II, Project Description, of the Draft EIR is accurate, stable, and finite and fully complies with CEQA; how the Project is distinguishable from the *Millennium* case in all material respects; and why a draft Specific Plan was not required to be included as part of the Draft or Final EIR. Nonetheless, in response to comments on the Draft EIR and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website. Also refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. That comparison confirms that the relevant Specific Plan elements were discussed and analyzed in the Draft EIR. Also, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other

things, a discretionary process (which requires subsequent CEQA compliance review) for future changes that are substantially different than the Project.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how Section II, Project Description, of the Draft EIR fully complies with CEQA, including CEQA's requirement to include a "general description" of the Project's technical, economic and environmental characteristics.

Regarding the comment about a "conceptual impact envelope," as explained in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project would include height zones, setbacks, and frontage areas that will dictate the placement, orientation, mass, and height of potential future buildings. Specific details about potential future buildings are unknown at this time but would not change the overall development limits set forth in the Draft EIR Project Description and those in the proposed Specific Plan. In addition, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Furthermore, the proposed Specific Plan would only allow for development consistent with the parameters described in the EIR and would require future review by the City for conformance with the Certified EIR and the approved Specific Plan. In addition, there is no provision under CEQA that requires a conceptual site plan for a specific plan project to identify the precise location and use of each building as suggested by the commenter, and the individual building plans for future development under the Specific Plan will not be created until after the adoption of the Specific Plan. Refer to Response to Comment Nos. 5-5 and 26-12 regarding the conceptual nature of the plans included in an EIR.

This comment also introduces more specific comments, which are discussed in more detail in Comment Nos. 9-13 through 9-24. As demonstrated in Response to Comment Nos. 9-13 through 9-24, Section II, Project Description, of the Draft EIR provides an accurate, stable, and finite description of the Project, and the Project Description was completed in full compliance with CEQA.

Comment No. 9-13

i. Envelope of Land Use Categories

The EIR includes a list of proposed limits of square footage for different types of uses on the Project site, including sound stage, production support, production office space, general office space, and retail. (DEIR, p. II-13.) The EIR, however, does not specify the mix of

uses, instead stating that the “ultimately constructed” mix “will depend upon market demands.” (DEIR, p. II-13.) As described in further detail below, the EIR also permits exchanges of square footage between land uses. (DEIR, p. II-16.) This means that the Project could allow for a virtually unlimited number of development scenarios. The EIR pairs these proposed, potential limits with a conceptual site plan displaying building footprints; however, the DEIR states that the plan is merely conceptual and “illustrates one possible development scenario that could be developed.” (DEIR pp. II-13 to II-14.) Indeed, the conceptual site plan shown in the EIR lacks detail or description of future development, as the potential buildings are represented by unlabeled white boxes. (DEIR, pp. II-14.)

Thus the Project is highly similar to the project at issue in *Millennium*, where the Court of Appeal found that development regulations incorporated into the project description provided the public and decisionmakers “little by way of actual information” regarding the project’s actual design. (*Millennium*, supra, 39 Cal.App.5th 1, 18.) Here, as in *Millennium*, “these regulations simply limit the range of construction choices for future developers.” (*Ibid.*) This does not meet CEQA’s requirements for a sufficient project description.

Response to Comment No. 9-13

Refer to Response to Comment No. 9-12. The Project Site has been used as a studio for over 70 years and the Project is the continuation of the studio use and the modernization and expansion of the studio. As discussed on pages II-10 to II-11 in Section II, Project Description, of the Draft EIR, the Project objectives include optimizing the currently underutilized studio and maximizing studio production capabilities by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities, production office, and general office. The digitization of the production industry has created the need for much more office space relative to sound stage and production support space. The proposed development program (Conceptual Site Plan) analyzed in the Draft EIR provides an adequate and complementary mix of uses, including 350,000 square feet of sound stage, 104,000 square feet of production support, 700,000 square feet of production office, 700,000 square feet of general office, and 20,000 square feet of retail uses. The optimal balance of studio uses has changed over time and will continue to change as the entertainment industry continues to evolve, but the existing studio is unable to adapt to such changes. Accordingly, the Project is proposing a Land Use Exchange Program to allow for limited flexibility in the size of the studio uses (increases permitted only to sound stages and production support uses), discussed further in Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Please note that, as discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project, including a proposal that involves a land use

exchange, or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As explained in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the *Millennium* case is not applicable to the Project because *Millennium* involved an individual building development project rather than a specific plan project. In addition, the description of the Project in the Draft EIR is distinguishable from the project description at issue in *Millennium*.

The draft EIR in *Millennium* described a “mixed-use development” that would include “some combination of residential dwelling units, luxury hotel rooms, office and associated uses, restaurant space, health and fitness center uses, and retail establishments.” The *Millennium* project description did not identify what uses would be built or the square footage or location of such uses. Unlike the project description for the *Millennium* project, Section II, Project Description, of the Draft EIR clearly and consistently states that the Project is a studio specific plan project that will include five studio land uses: sound stage, production support, production office, general office, and retail. In addition, Table II-2 of the Draft EIR provides the proposed floor area for each of these uses and the Conceptual Site Plan provided in Figure II-4 provides an overall layout of the Project.

The full text of the sentence referred to in this comment states: “The specific mix of uses ultimately constructed will depend upon market demands, and the Specific Plan would allow flexibility in locating the various uses within the Project Site.” This sentence immediately follows the detailed description of land uses in Table II-2 of the Draft EIR and is referring to a mix of “sound stage, production support, production office, general office, and retail uses.” Furthermore, the Land Use Exchange Program in the Draft EIR is limited to an exchange of up to 100,000 square feet of additional sound stage and up to 346,000 square feet of additional production support uses for a corresponding decrease in the square footage of the other permitted land uses. The Draft EIR fully disclosed and analyzed these limited land use exchanges. As is typical of a studio specific plan project, the ultimate square footage of each use to be developed within the Project Site will depend on market conditions. However, the total floor area will not exceed that set forth in Table II-2 of the Draft EIR and the maximum floor area for each of the proposed studio-related uses would not exceed that set forth on page II-16 of the Draft EIR. These same requirements are set forth in the Preliminary Draft Specific Plan. The Project is a studio project that provides for the continued operation of a studio with specific regulations regarding total floor area and maximum floor area for each of the studio land uses. With regard to the Conceptual Site Plan, as explained in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Conceptual Site Plan is based on the architectural plans that were submitted as part of the Project’s entitlement application. This Conceptual Site Plan along with the other information within Section II, Project Description,

of the Draft EIR was used to fully evaluate potential impacts associated with the Project. The proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. In addition, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, precise architectural drawings for individual buildings, building floor plans, landscape plans and building material specifications are details that are not currently available and are not required at this time to be included as part of a draft EIR for a specific plan project. In fact, technical drawings may well supply extensive detail beyond that needed for evaluation and review of the environmental impact in violation of CEQA Guidelines Section 15124. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR provides all of the necessary information to provide a thorough analysis of Project impacts in accordance with CEQA.

Comment No. 9-14

ii. Land Use Exchanges

Though the Project's envelope of potential square footage limits for various types of uses on the Project site itself is too vague (DEIR, p. II-13), the Project compounds the issue by allowing floor area from any permitted land use category within the site to be exchanged for additional sound stage and production support uses. (DEIR, p. II-16.) This excessive "development flexibility," as characterized by the DEIR, makes an already too-abstract project even more unstable and allows for an even broader range of future development scenarios. (*Ibid.*) While land use exchanges are still subject to square footage maximums for sound stage, production office, general office, and retail uses, there is no maximum for production support floor area, meaning that the Project could entail as much production support floor area as possible, so long as decreases are made in other uses. (*Ibid.*) Further, the land use exchanges may result in a higher overall footprint than specified in the envelope, so long as the sitewide FAR remains 1.75:1. (*Ibid.*)

The result of these exchanges is essentially to widen the range of square footage parameters applicable to the Project, thereby widening the range of potential future development onsite. This unacceptably broad and ill-defined range of potential development choices does not meet CEQA's requirements for accurate, stable, and finite project descriptions. (*Millennium, supra*, 39 Cal.App.5th 1, 18.)

The DEIR's lack of specificity regarding the Project's permitted uses and footprints is important because future development and its impacts, including future land use exchange

proposals, will be measured against “the envelope of impacts identified in this Draft EIR.” (DEIR, pp. II-16.) The DEIR purports to analyze a “hypothetical development mix” that would generate the “maximum possible” Project impacts (DEIR, pp. II-16 to II-17), but such a “worst case” approach is insufficient under CEQA. (*Millennium*, *supra*, 39 Cal.App.5th 1, 18 [“CEQA’s purposes go beyond an evaluation of theoretical environmental impacts.”].)

Response to Comment No. 9-14

As discussed in Response to Comment No. 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Land Use Exchange Program in the Draft EIR is limited to an exchange of additional sound stage or production support uses for a corresponding decrease in the square footage of other permitted land uses. The Land Use Exchange Program analyzed in the Draft EIR is identical to the program in the Preliminary Draft Specific Plan, except that, in response to comments on the Draft EIR, the program in the Preliminary Draft Specific Plan was clarified to limit production support floor area to a maximum of 450,000 square feet (there was no maximum limit in the Draft EIR). Section III, Revisions, Clarifications, and Corrections to the Draft EIR, includes revisions to Section II, Project Description, of the Draft EIR to limit the exchange for additional production support uses to a maximum of up to 450,000 square feet (an increase of up to 346,000 square feet of production support uses over that in Table II-2 of the Draft EIR) in exchange for a corresponding reduction in square footage in another permitted land use. In addition, the Land Use Exchange Program also includes a limited exchange to increase sound stages by up to 100,000 square feet (for a total of 450,000 square feet) with an equivalent reduction in one of the other permitted land uses. This limited land use exchange does not result in “widening the range of potential future development onsite.” Rather, this land use exchange would allow the studio to adapt and respond to the evolving needs of the entertainment industry. Contrary to the commenter’s assertion, the proposed Land Use Exchange Program does not render the Project Description inaccurate and unstable, as further discussed in Topical Response No. 1. Also, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project, including a proposal that involves a land use exchange, or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, unlike the draft EIR for the *Millennium* project, the Draft EIR for the Project does not merely utilize a “worst case” approach for evaluating impacts of the Project. Rather, the Draft EIR’s environmental analysis accounts for the maximum potential environmental impacts associated with buildout of the Project as set forth in Table II-2 of the Draft EIR and in the Conceptual Site Plan included in Figure II-4 of the Draft EIR. In

addition, the Draft EIR also analyzes the maximum impact scenario (i.e., the development scenario under the limited Land Use Exchange Program that would generate the greatest environmental impact). Refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic in addition to the Project as set forth in Table II-2 of Section II, Project Description, of the Draft EIR. While the Draft EIR has evaluated both the Project and the maximum impact development scenarios under the limited Land Use Exchange Program, the proposed Specific Plan requires that any future development proposal that involves a land use exchange and substantially complies with all applicable Specific Plan regulations would require a discretionary Project Compliance approval pursuant to LAMC Section 11.5.7[13B.4.2] and future CEQA compliance review.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5 and 26-5 for a more detailed discussion of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all of the necessary information to provide a thorough analysis of Project impacts in accordance with CEQA. Also refer to Topical Response No. 3, Permitted On-Site Uses. In total, these responses show that the Project as defined in the Draft EIR is more than sufficient under CEQA.

Comment No. 9-15

iii. Project Design and Architecture

The Project's proposed design is completely theoretical and unformed. The DEIR states that the Site's four existing sound stages "would be renovated and modernized to the extent feasible, subject to industry market demand." (DEIR, p. II-17.) This provides no concrete information as to whether renovation would occur, what such potential renovation would entail (such as what elements of the sound stages would be renovated), which sound stages would be renovated, what the timeline of such renovation would be, what relevant market information might govern renovation probability, and what factors determine feasibility of renovation. This cannot be the basis of an accurate, stable, or finite project description under CEQA.

Response to Comment No. 9-15

Contrary to this comment, sufficient detail regarding the design of the Project has been provided within Section II, Project Description, of the Draft EIR. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, under CEQA, the level of detail required in an EIR is dependent upon the underlying project. Per CEQA Guidelines Section 15146, "[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." CEQA Guidelines Section 15146(a) states that "[a]n EIR on a construction

project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.” Accordingly, less detail is required for a specific plan project than an individual building development project. Per OPR’s The Planner’s Guide to Specific Plans dated January 2001 (OPR Guide to Specific Plans), “[a]s the name implies, a specific plan EIR should contain analyses specific enough to reflect the level of detail in the plan (CEQA Guidelines § 15146).” The Draft EIR discusses all of the physical elements of the proposed Specific Plan in the same amount of detail as the proposed Specific Plan itself.¹⁰²

Note that the environmental impacts associated with renovation of sound stages, including those related to construction activities, are fully accounted for in the Draft EIR. Specifically, the construction equipment would represent a subset of the construction equipment evaluated in the Draft EIR, and construction activities would occur in accordance with the hours permitted by the LAMC and evaluated with the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR, is accurate, stable, and finite and provides all of the necessary information to allow for a thorough analysis of Project impacts in accordance with CEQA.

Comment No. 9-16

The Project proposes six height zones, within which development would be subject to certain height limits. (DEIR, pp. II-17 to II-20.) The project description found impermissible in *Millennium* also relied on height zones, which obscured the project’s massing and design configuration. (*Millennium*, *supra*, 39 Cal.App.5th 1, 12.)

However, the Project’s height zones are even more unclear, because some of these height zones are variable. In Height Zone C, development is limited to a maximum of 160 feet within up to 40 percent of the area, with the remainder limited to 88 feet. In Height Zone D, development is limited to a maximum of 225 feet within up to 40 percent of the area, with the remainder limited to 88 feet. The 40 percent of Height Zones C and D in which the maximum height is increased is not a specified area; thus, a multitude of configurations, none of which are specifically proposed in the DEIR, could satisfy these requirements. In fact, the DEIR admits that the height zones “do not represent the actual development

¹⁰² Please refer to Appendix FEIR-2 of this Final EIR, which lists all physical elements of the Project that were disclosed and analyzed in the Draft EIR; this appendix also includes a comparison of the Project elements disclosed in the Draft EIR with the proposed Specific Plan, Sign District and General Plan Amendment Resolution that confirms that all necessary Project elements were discussed and analyzed in the Draft EIR.

footprint of Project buildings.” (DEIR, p. II-20.) These height zones further contribute to the Project Description’s instability.

The variability of the height zones also makes the Project’s proposed frontage and setbacks unstable and variable, since the proposed limits include additional setbacks for buildings within Height Zones C and D that exceed the 88-foot base height. (DEIR, p. II-21.) Since the DEIR does not specify building heights, this means that the frontages and setbacks are also unspecified.

Response to Comment No. 9-16

Regarding *Millennium*, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how the *Millennium* case is not applicable to the Project, and how the Project Description differs from the project description at issue in *Millennium*.

With regard to the height zones, pages II-17 through II-21 of Section II, Project Description, of the Draft EIR provide a detailed description of the proposed height zones and include Figure II-5, Height Zone Map. As clearly described therein, these height zones set forth maximum building height limits that will regulate building height throughout the Project Site. New buildings would occupy only a portion of the building envelope permitted in each height zone. Contrary to the comment, the frontages shown in Figure II-5 and described on pages II-20 and II-21 of the Draft EIR are not variable and would be implemented as new buildings are constructed. Building setbacks are also required for those portions of buildings in Height Zones C and D that are greater than 88 feet in height above Project Grade and located adjacent to the public right-of-way or the southern property line.

This comment appears to misunderstand the purpose and function of a specific plan as compared to an individual development project. A specific plan is a regulatory land use ordinance that establishes zoning regulations, such as maximum height limits. Notably, the existing zoning for the Project Site permits unlimited height. Nevertheless, the Specific Plan would impose height limits across the entire Project Site. It is important to note that a maximum height limit is different than the proposed height of an individual building. The Project is a specific plan project and not an individual development project, and the proposed height limitations are consistent with the specific plan nature of the Project. Further, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, any future development project that is substantially different from the Project would require a discretionary approval and subsequent CEQA compliance review. Most importantly, the proposed height limits in each of the height zones have been consistent throughout the life of the Project; the height limits described in the Draft EIR are the same as those included in the Project’s application submittal in March of 2021, the Initial Study

(Appendix A of the Draft EIR; see pages 17 to 19), and the Preliminary Draft Specific Plan. Thus, the height limits do not contribute to any instability in the Project Description, as incorrectly claimed by the commenter.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all of the necessary information to allow for a thorough analysis of Project impacts in accordance with CEQA.

Comment No. 9-17

The Project Description also states that the Specific Plan would include design regulations to address screening of rooftop equipment and outdoor storage areas, fencing, parking structures, and Project access points. (DEIR, p. II-22.) Yet the DEIR fails to specify these regulations. Further, the DEIR improperly defers analysis of these regulations by failing to state them in the DEIR itself.

Response to Comment No. 9-17

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA. The design standards included in the Specific Plan and more detailed design information are not necessary for the CEQA environmental analysis of the Project. Nevertheless, in response to comments on the Draft EIR and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website. As shown Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR, the design regulations in the Preliminary Draft Specific Plan are consistent with the description in the Draft EIR.

The comment does not include all of the relevant text regarding screening that is provided on page II-22 of Section II, Project Description, of the Draft EIR. The full text from page II-22 of the Draft EIR that the comment is referring to is as follows:

The Specific Plan also would include design regulations that address the screening of rooftop equipment and outdoor storage areas, fencing, parking structures, and Project Site access points. In particular, rooftop equipment and outdoor storage areas that are visible from the public right-of-way must be screened with vegetated walls, fences, trellises, graphic treatments, other structures, or other approved measures. Fencing of up to 12 feet in height would be permitted on-site, and chain link fencing without inserts or secondary screening (such as fabric or panels) and barbed wire fencing

would be prohibited. Fencing would be maintained in a clean and well-kept manner, including through the repair of broken walls and removal of graffiti, and improved with either low maintenance landscaping, hardscape, or a combination of both.

Based on the above, the Draft EIR does not defer analysis of these regulations as incorrectly stated in this comment. Also note that CEQA defines the “project” to be analyzed in an EIR as the “physical change in the environment,” not the regulatory document governing that change. Furthermore, as discussed in Response to Comment No. 5-10, pursuant to SB 743, aesthetics impacts associated with the Project are concluded to be less than significant. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all of the necessary information to allow for a thorough analysis of Project impacts in accordance with CEQA.

Comment No. 9-18

The DEIR similarly fails to specify the Specific Plan’s purported guidelines and parameters for new construction to preserve the Site’s Historic-Cultural Monument. These guidelines are not located in the Project Description.

Response to Comment No. 9-18

The analysis of potential impacts to the Primary Studio Complex and associated PDFs are appropriately included in Section IV.B, Cultural Resources, of the Draft EIR. Section II, Project Description, of the Draft EIR provides an overview of the historic regulations that would be implemented on pages II-22 to II-23. As stated on page IV.B-53 in Section IV.B, Cultural Resources, of the Draft EIR, the Project would comply with LAMC Section 22.171.14 (the Cultural Heritage Ordinance), which requires review of construction documents by the City’s Office of Historic Resources (OHR) prior to approving building permits for any substantial alteration to the HCM and would ensure compliance with the Rehabilitation Standards. As set forth in Section IV.B, Cultural Resources, of the Draft EIR, the Project would also implement Project Design Feature CUL-PDF-1 that includes specific Project Parameters to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. Additionally, per Project Design Feature CUL-PDF-2, a historic structure report (HSR) would be prepared that will serve as an important guide for the rehabilitation of the Primary Studio Complex in accordance with the Rehabilitation Standards and will provide detailed information and instruction above and beyond what is typically available prior to the rehabilitation of a historical resource. With these regulatory requirements and PDFs, the Draft EIR concludes that potential impacts related to historical resources would be less than significant.

The proposed Specific Plan also would include historic regulations that incorporate the same LAMC regulations and PDFs set forth in Section IV.B, Cultural Resources, of the Draft EIR, and codifies the standards in the HCM designation regarding the Viewshed Restoration Area. Refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website.

Comment No. 9-19

iv. Rooftop Terraces

The DEIR states that rooftop terraces and decks may be incorporated by Project buildings, but does not commit to any design, stating that "such terraces could be located anywhere within the Project Site" in accordance with the yet-to-be-drafted Specific Plan requirements. (DEIR, p. II-23.) Further, the DEIR states that the hours of operation for these outdoor areas would "generally" be 7:00 AM to 12:00 AM, but that is a speculative statement given that the uses of development onsite are still unknown. (DEIR, pp. II-23 to II-24.)

Response to Comment No. 9-19

Pages II-23 and II-25 of Section II, Project Description, of the Draft EIR states the following regarding rooftop terraces and decks:

Within Figure II-6, rooftop landscaping is shown in potential terrace locations, although such terraces could be located anywhere within the Project Site in accordance with Specific Plan requirements. Noise limits would be established for any outdoor amplified sound systems used for gatherings (non-production uses) on roof decks. The hours of operation for use of these outdoor gathering areas generally would be from 7:00 A.M. to 12:00 A.M.

Section IV.I, Noise, of the Draft EIR evaluated the potential noise impacts associated with the use of these outdoor areas illustrated in Figure II-6 and concluded that with the design specifications included in Project Design Feature NOI-PDF-4, operational noise impacts from these outdoor areas would be less than significant. In addition, the analysis shows that under a conservative assumption that 1,200 people would gather at a given roof deck location along each of the four sides of the Project Site perimeter with a total of 5,000 people throughout the Project Site, impacts would be less than significant.

With regard to the hours of use for the rooftop terraces and decks, they will be used between the hours of 7:00 A.M. to 12:00 A.M. as stated in the Draft EIR. The studio will continue to operate on a 24/7 basis, consistent with existing conditions. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Although the Draft EIR conservatively assumed that rooftop decks would be located along the perimeter of the Project Site for analysis purposes, the actual location of such rooftop decks would be on top of the buildings shown in the Conceptual Site Plan. Refer to Response to Comment Nos. 5-3 and 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the level of detail needed within a draft EIR for a specific plan project.

Comment No. 9-20

v. Parking

The Project's parking facilities are utterly unformed. The DEIR admits that parking may involve a "combination" of above-ground structures, subterranean structures, and surface spaces, but provides no specificity as to which. (DEIR, p. II-30.) The DEIR also admits that parking may be provided onsite "incrementally to meet the needs of individual buildings and uses the spaces would serve, as appropriate and feasible." (*Ibid.*) This provides the public and decisionmakers virtually no specificity with which to analyze the Project's impacts related to parking. The DEIR also claims that the Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, but no details regarding this plan are provided. (DEIR, p. II-30.) Even if they were, analysis of such a plan would amount to impermissible post-hoc environmental review. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 394.)

Response to Comment No. 9-20

Under SB 743, the adequacy of a new development's parking supply, including the shared/reduced parking process, is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Also refer to the Preliminary Draft Specific Plan regarding how parking would be implemented for the Project. The Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website. Based on the Conceptual Site Plan provided in Figure II-4 of Section II, Project Description, of the Draft EIR, and the application materials filed with the City, parking would be provided in a parking structure in the southeast corner of the Project Site adjacent to the parking structure serving The Grove shopping center and in underground and surface parking areas. While the Conceptual Site Plan provided in Figure II-4 in Section II, Project Description, of the Draft EIR, illustrates specific parking locations, ultimately, parking may be located at different locations within the Project Site, as disclosed in the Draft EIR. As discussed in Response to Comment No. 26-135, with adherence to the specified frontage areas, operational noise impacts would be less than significant even

if the location were different than set forth in Figure II-4. In addition, modification to the locations of parking areas would also not result in any other environmental impacts. Furthermore, as discussed in detail in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

With regard to the commenter's reference to *Laurel Heights Improvement Assn. v. Regents of University of California* (1988), the EIR in that case failed to discuss the anticipated future uses of the facility at issue and the likely effects of those uses. Here, for the reasons described above, the Draft EIR does not fail to discuss the anticipated future uses of the Project Site or the likely effects of those uses. The exact location of the on-site parking supply is not necessary for a legally sufficient EIR, as explained above. The Court in *Laurel Heights* noted, "we cannot and do not by this opinion prescribe the exact information that the University must include in its EIR. We expect the University will attempt in good faith to fulfill its obligation under CEQA to provide sufficient meaningful information regarding the types of activity and environmental effects that are reasonably foreseeable." This reinforces the concept that, as stated in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, under CEQA, the level of detail required in an EIR is dependent upon the underlying project. Per CEQA Guidelines Section 15146, "[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Accordingly, less detail is required for a specific plan project than an individual building development project.

Comment No. 9-21

vi. Signage

The Project's proposed signage is completely unformed. The Project proposal includes an application for a Sign District, but no draft ordinance for the proposed Sign District is included in the DEIR. (DEIR, p. II-31.) The Project Description states that signage "would be integrated with and complement the overall aesthetic character of on-site development," but since there is no proposal for onsite development, this leaves the potential signage onsite, as well as its potential impacts, completely unknown and speculative. The EIR cannot be certified until a concrete proposal for signage, as well as a draft ordinance, are presented to the public and decisionmakers.

Response to Comment No. 9-21

Refer to Response to Comment Nos. 5-10 and 26-129. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all elements of the Preliminary Draft Specific Plan required by CEQA, and the Preliminary Draft Specific Plan is not necessary for the environmental analysis of the Project. Nevertheless, in response to comments and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website.

Comment No. 9-22**vii. Haul Routes**

The Project Description fails to provide definite haul routes, instead presenting three options for potential construction haul routes for trucks entering and exiting the Project site. (DEIR, pp. II-34 to II-35.) One route primarily travels through Fairfax Ave from I-10, one route crosses over from La Brea Ave to Fairfax Ave on San Vicente Blvd, and one route primarily travels north/south on La Brea Ave. (*Ibid.*) Each of these routes will have differing impacts. The Project must select one defined haul route so that the public can adequately evaluate its impacts.

Response to Comment No. 9-22

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes. Each of the three haul routes was adequately disclosed and evaluated in the Draft EIR and was approved by LADOT. For example, refer to pages IV.I-41 through IV.I-43 of Section IV.I, Noise, of the Draft EIR for a detailed analysis of potential off-site noise impacts associated with use of each of the haul routes. Contrary to the comment, the Applicant does not need to select one haul route. Rather, these routes can be used to effectively manage hauling activities. Three routes were selected to comprehensively analyze the potential haul routes and ensure all associated environmental impacts with any of the potential haul routes were evaluated in the Draft EIR.

Comment No. 9-23**viii. Mitigation, Monitoring, and Reporting Plan**

The EIR lacks a Mitigation, Monitoring, and Reporting Plan (MMRP). We request that the City provide an MMRP for this Project to allow for a complete evaluation of the efficacy of mitigation proposed for the Project.

Response to Comment No. 9-23

Pursuant to Section 15097 of the CEQA Guidelines, the Mitigation Monitoring Program is included as Section IV of this Final EIR. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 9-24**2. The Project Timeline is Unstable.**

In addition to the unstable and inchoate nature of the Project's features, the timeline of the Project is also extremely unclear. The DEIR admits that "[b]uildout under the Specific Plan could take place in one phase over a 32-month period, or could occur in phases over multiple years. Accordingly, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043." (DEIR, pp. II-12.)

This timeline is simply unacceptable. It provides the public and decisionmakers with very little information about when the Project will be built. The Project—which is still undefined and unknown for the reasons discussed above—may be built in as quickly as just under 3 years, or as slowly as 20 years (or more, as the terms of the Development Agreement are not presented here). The DEIR also suggests the Project may be built in phases, which is required to be studied in an EIR. "When a specific project contemplates future expansion, the lead agency is required to review all phases of the project before it is undertaken." (*Natural Resources Defense Council, Inc. v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 284.)

The lack of clarity regarding the Project's timeline deprives the public and decisionmakers of information regarding what developments may be built onsite at what time. Thus, we urge the City to recirculate an EIR with a defined timeline for the Project.

Response to Comment No. 9-24

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all of the necessary information to allow for a thorough analysis of Project impacts in accordance with CEQA.

As discussed in Response to Comment No. 5-12, the Draft EIR conservatively assumes a 32-month construction duration that includes overlapping activities and construction phases and more intense activities on a daily basis. The 32-month timeframe

is preferred by the Applicant, who intends to complete construction of the Project within this timeframe, subject to market conditions. However, as stated on page II-36 in Section II, Project Description, of the Draft EIR and throughout the Draft EIR, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. As with most development projects, market conditions will ultimately influence the buildout timeframe for the Project. As such, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. Please note that a 20-year buildout scenario does not mean 20 years of construction, as the scope of the Project is the same regardless of the buildout duration. A long-term buildout scenario involves multiple, non-overlapping construction phases with periods of no construction in between phases. *Natural Resources Defense Council, Inc. v. City of Los Angeles* (2002) (“*NRDC*”) is not applicable to this Project. First, *NRDC* involved a Program EIR, whereas the Draft EIR in this case is a Project EIR. In *NRDC*, the Applicant divided a construction project into three phases under a Program EIR, and the Court determined that the original Program EIR did not cover a new construction project that was not even contemplated at the time the Program EIR was approved. Citing CEQA Guidelines Section 15168, the Court defined a Program EIR as an “EIR which may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically, [or] (2) as logical parts in the chain of contemplated actions.” (*NRDC*, p. 281). Because the *NRDC* project at issue did not arise until after approval of the Program EIR, it could not have been contemplated as one of the series of actions covered by the Program EIR. The *NRDC* case does not apply to the Project because the Draft EIR in this case disclosed and comprehensively analyzed full buildout of the Project.

Also note that the Development Agreement would only allow for development consistent with the Project described in a Certified EIR. Other provisions of the Development Agreement would be contractual matters between the City of Los Angeles and the Applicant and do not constitute environmental impacts under CEQA. Accordingly, the Development Agreement is not required to be included as part of the Draft EIR.

Comment No. 9-25

C. The DEIR Lacks Sufficient Information about the Necessity of the Sign District.

We question the necessity of the proposed Sign District, and the reasoning for which the Project Applicant has applied for a Sign District for this Project, neither of which are disclosed in the DEIR. The DEIR has also failed to articulate an adequately defined Project Description (Section I.B), which makes the necessity of additional signage even more unclear.

Response to Comment No. 9-25

The necessity of a sign district is not relevant to a project's environmental analysis under CEQA. In accordance with CEQA, all environmental aspects of the Project (i.e., all aspects that may cause a physical impact on the environment), including, among other Project approvals, the proposed Sign District, were fully disclosed and analyzed in the Draft EIR. The Preliminary Draft Specific Plan is not necessary for the environmental analysis of the Project. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Refer to Response to Comment No. 5-10 regarding the key components of the Preliminary Draft Specific Plan that were disclosed and analyzed in the Draft EIR and the availability of the Preliminary Draft Specific Plan for public review.

Comment No. 9-26

Further, the DEIR fails to include a draft of the ordinance for the proposed Sign District. Pursuant to Los Angeles Municipal Code section 13.11, subdivision (C), development regulations for signage, set forth in a Sign District ordinance, must be determined at the time the Sign District is established. The DEIR appears to include some development regulations but has not provided a draft ordinance. We request a draft ordinance stating the development regulations for the proposed Sign District be provided with a recirculated DEIR.

Response to Comment No. 9-26

Refer to Response to Comment Nos. 5-10 and 26-129 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all elements of the Preliminary Draft Specific Plan required by CEQA, and the Preliminary Draft Specific Plan is not necessary for the environmental analysis of the Project. Nevertheless, in response to comments and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website. Additionally, the Sign District submittal complies with the requirements of LAMC Section 13.11 B in that, at submittal, the properties were all in C Zones, the size of the Sign District exceeds 3 acres in area (the Project Site is approximately 25 acres), and all the parcels are contiguous. Per this code section, it is this precise boundary condition that is required at the time of application, not the development regulations identified by the commenter. The development regulations for a sign district, as outlined in LAMC Section 13.11 C, shall be determined at the time the sign district ordinance is established (after review and approval by the City Council and Mayor), not at the point the request is submitted.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 9-27

II. The DEIR’s Analysis of Traffic Impacts is Inadequate.

A. The DEIR’s Traffic Analysis is Informationally Deficient.

The lack of information due to the unavailability of the draft TVC 2025 Specific Plan and unstable project description addressed above infects the adequacy of the DEIR’s transportation analysis. This lack of an adequate project description leaves many questions unanswered and fails to provide adequate information and analysis of the Project’s traffic impacts.

Response to Comment No. 9-27

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how Section II, Project Description, of the Draft EIR was completed in full compliance with CEQA and includes sufficient information and details to analyze the environmental impacts of the Project, including impacts related to transportation (also refer to Section IV.K, Transportation, of the Draft EIR). As discussed in Topical Response No. 1, the Draft EIR disclosed all elements of the Project required by CEQA and provides a comprehensive analysis of the Project.

Comment No. 9-28

One of the areas with a lack of adequate analysis is parking. The DEIR is unable to identify how many parking spaces would be provided in the Specific Plan area or what type of parking would be included, regular pull-in parking spaces, valet, double tandem or even triple tandem are potential options. (DEIR IV-K.44.) Shared parking is also identified as a possibility. (*Ibid.*) Without this information, the DEIR cannot assess whether there is adequate parking for the Project on site, or if the type of parking would encourage those accessing the Project to try to park off-site.

Response to Comment No. 9-28

Pursuant to SB 743, the adequacy of a new development’s parking supply is not a CEQA consideration or a basis for finding a significant environmental impact. In addition, AB 2097 is a new State law that prohibits public agencies and cities from imposing a minimum automobile parking requirement on most development projects located within a

one-half mile radius of a major transit stop. This bill would apply to the Project Site. Accordingly, the parking provisions discussed in the Draft EIR that would be implemented under the proposed Specific Plan have been clarified to be the proposed parking ratios to meet the studio's peak parking demands.

Nonetheless, as discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces. Vehicles may be parked in tandem or by valet, depending on the specific parking layout. In addition, the Project could include a reduced/shared parking plan as long as an adequate parking supply is maintained. The adequacy of the parking supply would be determined by the shared parking or parking demand analysis, which would in turn be reviewed for adequacy by the Department of City Planning. Contrary to the suggestion in the comment, the operation of the parking supply (valet, tandem attendants, self-park, etc.) is a secondary consideration to having the correct number of spaces included in the supply because the operation can be modified to better serve the parking supply provided. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project. Off-site parking is not needed to meet the Project's peak parking demands, and the Project no longer proposes any off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 9-29

The DEIR also fails to provide adequate information to address whether the Project could have a significant impact due to traffic hazards. The DEIR acknowledges that the intersection of Beverly Boulevard and Fairfax Avenue adjacent to the Project site is included in the City's high injury network. (DEIR App. M, p. 25.) However, the DEIR fails to analyze whether the significant number of new daily trips generated by the Project would increase this existing traffic hazard. The Project would result in the level of service (LOS) at this intersection going from a LOS D (fair) to LOS E (poor). Further, the Project's increase in employees, stages and production space will increase the number of vehicles accessing the site. Since access to the site requires a security verification check-point, the increase in vehicles could lead to increased queueing into the site. Longer queues could stretch into Beverly Boulevard, presenting a traffic hazard. The impacts on increased traffic hazards must be assessed, but were not.

Response to Comment No. 9-29

Consistent with Threshold XVII(c) of Appendix G of the CEQA Guidelines, Threshold T-3 in the TAG relates to significant impacts due to a "substantial increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)." As described on page 2-19 of the TAG, impacts under this

threshold “relate to the design of access points” and “may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections.” The Transportation Assessment (Appendix M.1 of the Draft EIR) includes a comprehensive analysis of traffic hazards beginning on page 124. As concluded therein, the Project would not increase hazards at the proposed Project driveways and along adjacent streets, due to geometric design features from safety, operational or capacity effects (taking into account a number of compatibility factors, including, among others, the relative amount of pedestrian activity, visibility factors, physical conditions, roadway lanes, roadway utilization/capacity and permitted speeds).

The turn lane queues have been fully disclosed in Table 19 on pages 164 to 165 of the Transportation Assessment (Appendix M.1 of the Draft EIR) and found to not represent any hazards. As with any other development project, the Project would add vehicles to through lanes on area streets, which would add to the queues in the area, as described in Table 18 on pages 162 to 163 of the Transportation Assessment. These non-CEQA transportation effects were determined to not represent problematic operational effects by LADOT. The additional queues along The Grove Drive caused by Project vehicles do not represent a hazard because The Grove Drive Project entrance would be signalized, and if the northbound queue from Beverly Boulevard reaches that point, the traffic signal will regulate vehicles leaving the Project Site until capacity on The Grove Drive is available to accommodate the additional Project vehicles.

As stated on page 125 of the Transportation Assessment, each Project driveway was closely reviewed by LADOT and compared to the driveway design guidelines from Section 321 of the Manual of Policies and Procedures. The final driveway plans would be reviewed by the Los Angeles Department of Building and Safety (LADBS), Bureau of Engineering (BOE), and LADOT during the building permit process to ensure code compliance and safe pedestrian and vehicular design. All parking control systems (e.g., security booths, gate arms) would be placed on-site and would provide adequate reservoir area to avoid potential queue spillover onto adjacent roadways. As concluded in the Transportation Assessment, the Project driveways would not present any geometric design hazards related to traffic movement.

The Initial Study, included in Appendix A of the Draft EIR, provided an analysis of the Project’s potential impacts related to hazards due to a geometric design feature or incompatible uses on pages 73–74 and concluded that impacts would be less than significant; refer also to pages VI-31 to VI-32 in Section VI, Other CEQA Considerations, of the Draft EIR and pages IV.K-78 to IV.K-79 in Section IV.K, Transportation, of the Draft EIR. As discussed therein, all Project access points would be designed to meet all applicable City Building Code and Fire Code requirements and would incorporate pedestrian warning systems as appropriate. The Project would provide passenger loading

areas for carpools and rideshares and dedicated pedestrian access on all street and alley frontages. All crosswalks adjacent to the Project Site are improved with continental crosswalks. The Project proposes to install a pedestrian hybrid beacon (a type of traffic signal control for pedestrian crosswalks) at the crosswalk on Melrose Avenue at Stanley Avenue in support of Vision Zero. The Project would also install left-turn signal phasing at three intersections, including Fairfax Avenue and 3rd Street, Martel Avenue/Hauser Boulevard and 3rd Street, and La Brea Avenue and 3rd Street. Left-turn signal phasing helps to improve pedestrian safety by separating pedestrian crossings from conflicting left-turn movements.

Regarding queuing, please refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, for a discussion of how adequate internal queuing space would be provided at each driveway, meeting or exceeding City minimum standards of 60 feet of off-street queuing for any driveway serving 300 parking spaces or more. Overall, the Project does not propose any uses that are incompatible with the surroundings. The Project Site has consisted of production-related uses for over 70 years, which would continue with the Project. The Project also includes up to 20,000 square feet of retail space, which is also compatible with the surrounding urban character. Retail space is common along the arterial streets in the vicinity of the Project Site, including directly across the street on both Beverly Boulevard and Fairfax Avenue.

Therefore, as concluded in the Initial Study, the Project would have a less-than-significant impact related to increased hazards due to a design feature or incompatible use, and no further analysis of this topic was required in the Draft EIR. Nonetheless, the Transportation Assessment (Appendix M.1 to the Draft EIR) provides a detailed discussion of Threshold T-3 in Section 4C.

The commenter's assertion that the Project would generate a significant number of new daily trips is incorrect. Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the Draft EIR's analysis of the Project's potential transportation impacts and conclusion that transportation impacts would be less than significant during both construction and operation. Refer also to Topical Response No. 10, Trip Generation, which discusses the number of trips that would be generated by the Project. The assertion that the "significant number of new daily trips generated by the Project would increase this traffic hazard" is an unsubstantiated statement. First, CEQA does not have any threshold for significance related to the number of trips generated by a project. Second, the comment seeks to associate an increase in the number of daily trips to an increase in potential safety hazards. Topical Response No. 12, Safety and Congestion, discusses traffic safety related to congestion and speed along the HIN.

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e.,

LOS) to VMT. Therefore, changes in driver delay are not considered transportation impacts under CEQA, and, under State law, LOS and vehicle delay cannot be considered significant environmental impacts as a matter of law. Nonetheless, in accordance with the TAG, the Transportation Assessment evaluated LOS and vehicle delay as part of the non-CEQA transportation analysis. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion. With regard to LOS E operations at the intersection of Fairfax Avenue and Beverly Boulevard with Project trips, the Project would only result in a change in the LOS at that location during the morning peak hour under Existing with Project Conditions, which is a theoretical scenario in which the entire Project were completed in year 2021 (refer to Table 17 on page 160 of the Transportation Assessment [included in Appendix M.1 of the Draft EIR]). In the more realistic scenario in which the Project is completed as early as the year 2026, that intersection would operate at LOS E during both the morning and afternoon peak hours as a result of background traffic growth, without the addition of any Project trips (refer to Table 18 on page 162 of the Transportation Assessment). As such, the Project would not cause LOS E conditions, and, therefore, the commenter's statement to the contrary is inaccurate. The Project includes TDM strategies and traffic signal and operational improvements along the HIN corridors that would advance the traffic safety goals of the City's Vision Zero Program and would include LOS benefits.

Comment No. 9-30

B. The DEIR Relies Upon Unsupported Traffic Assumptions to Assess Vehicle Miles Traveled.

The DEIR relies upon a number of unsubstantiated assumptions in support of its claim that the Project would have no signification [sic] traffic impacts and that it does not require any mitigation. The DEIR's assessment of Project-generated vehicle miles traveled (VMTs) relies on a number of assumptions, but the DEIR and its appendices fail to provide evidentiary support to determine the validity of these assumptions. For example, the DEIR uses of an average trip length of between 6.2 and 8.1 miles to assess the Project's VMTs, but fails to provide an evidentiary basis for that assumed trip length. What is the basis to assume that average trip length to the TVC 2050 Project would be that length?

Response to Comment No. 9-30

Refer to Topical Response No. 8, Vehicle Miles Traveled, which provides a detailed explanation of the adequacy of the assumptions and results of the VMT analysis, as well as the appropriateness of using the City's VMT Calculator. The trip length assumptions in the VMT Calculator are based on home-to-work trips in that area of the City as set forth in the City's travel demand forecasting model, and the assumptions in the VMT Calculator follow State guidance on VMT analysis. As stated in Section 15064.3 of the CEQA Guidelines, "a lead agency may use models to estimate a project's vehicle miles traveled." Consistent

with State of California guidance on VMT analysis,¹⁰³ the Project's trip lengths were estimated using the same source data used by the City to develop the significance thresholds (i.e., the City's model), thereby resulting in an "apples-to-apples" comparison between Project VMT and the areawide average VMT upon which the thresholds of significance are based.

Comment No. 9-31

The DEIR also assumes a fairly evenly disbursed trip distribution, with 35% from the northwest, 25% from the northeast, 15% from the southeast, and 25% from the southwest. What evidence does the DEIR rely upon to support this assumed trip distribution?

Response to Comment No. 9-31

This comment refers to the trip distribution associated with the Project-related trips assigned to the local street system, which is directly related to the operational LOS analysis for the Project. It should be noted that as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, changes in driver delay are not considered transportation impacts under CEQA, and, under State law, LOS and vehicle delay cannot be considered significant environmental impacts as a matter of law.

The development of the Project trip distribution assumptions used in the non-CEQA analysis included in the LADOT-approved Transportation Assessment (Appendix M.1 of the Draft EIR) considered many factors, including existing employee zip code information, general traffic patterns, locations of residential areas from which potential future employees and visitors of the Project would be drawn, the operating conditions and characteristics of the local street system, access to regional freeways, and proposed driveways to the Project Site. The base assumptions, including the trip distribution for the Project-related trips, were identified as part of the study approach and were outlined in the Memorandum of Understanding dated June 25, 2021, which was reviewed and approved by LADOT and is attached as Appendix A to the Transportation Assessment.

Comment No. 9-32

Additionally, the DEIR fails to provide support for its claim that the VMT per employee does not exceed the impact threshold of 7.6. (DEIR App. M, p. 123.) To assess this figure, the DEIR calculates that the Project would have 95,865 total daily VMTs. The DEIR the

¹⁰³ California Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

subtracts out baseline VMTs and concludes the Project would have 69,055 new daily VMTs. The assessment also relies on a total number of employees for the Project site of 7,832, but does not address how many would be new employees. To calculate the VMT per employee, the DEIR uses a further reduced daily VMTs amount of 52,194, which is reduced further below the new daily VMTs. Instead of dividing this new amount of daily VMTs by the number of new employees to compare apples to apples, the DEIR instead divides the reduced number of daily VMTs by the total number of employees. This does not compare apples to apples and instead results in a diluted number of daily VMTs. This significantly underestimates the VMTs per employee. If the 69,055 new daily VMTs or the 95,865 total daily VMTs were divided by the total number of employees, the Project would exceed the impact threshold for VMT per employee, with 8.8 and 12.2 VMTs per employee respectively.

Response to Comment No. 9-32

The comment misrepresents the VMT analysis and results presented in the Transportation Assessment included in Appendix M.1 of the Draft EIR and summarized in Section IV.K, Transportation, of the Draft EIR. Refer to Topical Response No. 8, Vehicle Miles Traveled, which provides a detailed explanation of the adequacy of the assumptions and results of the VMT analysis, as well as the appropriateness of using the City's VMT Calculator. The Project's transportation analysis and resulting impacts were assessed in the Draft EIR using VMT methodology in accordance with CEQA and LADOT guidance. While Table 13 on page 123 of the Transportation Assessment identifies both gross total and net new daily VMT, the net new daily VMT is provided for informational purposes only. The OPR Technical Advisory makes it clear that for redevelopment projects, where the project replaces or adds to existing operating land uses, the VMT analysis is based on the entire project upon completion. Page 18 of the OPR Technical Advisory, for example, states that the VMT thresholds, which are efficiency metrics (e.g., based on VMT per person), "apply only to the existing project without regard to the VMT generated by the previously existing land use."

Further, the VMT per employee metric is based on *home-based work attraction* trips, which are one specific component of gross total VMT. The gross total daily VMT or other components of total VMT, such as *home-based other attraction* and *non-home-based other attraction*, are not used in the calculation of VMT per employee. Similarly, the City's significant impact thresholds are based only on home-based work attraction VMT and do not incorporate total VMT or the other components of total VMT. Thus, the Project's VMT per employee metric can be compared on an "apples-to-apples" basis with the thresholds of significance, consistent with page 5 of the OPR Technical Advisory guidance on VMT analysis. The VMT analysis is conducted using gross total home-based work attraction VMT (approximately 52,194 total daily work VMT) and the gross total employees (approximately 7,832 employees). In dividing the work VMT by employees, the resulting

VTM per employee is 6.7 miles as stated in the Draft EIR. See Table II-2 in Topical Response No. 8, Vehicle Miles Traveled, for a helpful illustration of how VMT is calculated.

Regarding existing employees, the Transportation Assessment states that there are approximately 2,130 existing employees (see Table 9 in Appendix A of the Transportation Assessment). As explained above, the number of total Project employees, rather than the number of existing employees, is what is relevant for the VMT transportation analysis.

Comment No. 9-33

C. The DEIR's Analysis of Cut-Through Traffic is Improperly Deferred.

The DEIR's analysis and mitigation of neighborhood cut-through traffic impacts is improperly deferred. Degradation of surrounding streets' LOS to LOS E and LOS F, will cause motorists to find less congested routes, likely through the adjacent neighborhood. Based on information provided in the DEIR, it is clear the Project would have residential street cut-through impacts. Buried in DEIR Appendix M, it is identified that mitigation is required to prevent these impacts on Genesee Avenue, but no mitigation is provided in the DEIR. (DEIR App. M, p. 171.) Impacts are also assumed for Stanley Avenue and Spaulding Avenue, also without the provision of any mitigation. (DEIR App. M, p. 171.)

The DEIR improperly defers a full analysis of these cut-through traffic impacts to post-EIR, claiming they cannot be assessed now due to reduced traffic levels following the COVID-19 pandemic. The City cannot approve this Project without a proper assessment of cut-through traffic impacts.

Response to Comment No. 9-33

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR), the Project's NTMP, the timing and preparation of the NTMP, and why the preparation of an NTMP does not represent deferred mitigation. As stated therein, a project's effect on automobile delay, including cut-through trips, is not an impact under CEQA, and, therefore, there are no significant impacts related to automobile delay that require mitigation under CEQA.

Comment No. 9-34

D. The DEIR Improperly Relies Upon Project Design Features Without Disclosing Impacts.

Throughout, the DEIR improperly relies upon so-called project design features (PDFs) and claims that conditions will be placed on the Project in an attempt to reduce many of the

Project's impact without the required analysis of the impacts or the measures relied upon to mitigate them. The majority of these PDFs appear to be mitigation measures that the Project applicant and City have failed to incorporate into the Project's Mitigation Monitoring and Reporting Program (MMRP). When a Project incorporates mitigation measures, CEQA requires that those mitigation measures be "fully enforceable through permit conditions, agreements, or other measures." (Pub. Resources Code § 21081.6(b).)

As mere PDFs that will not necessarily be incorporated into Project approvals, conditions, and the MMRP, the PDFs are not properly enforceable by the City or third parties and cannot be relied upon for any reductions in Project impacts. CEQA's mitigation requirements exist for a reason. "The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." (*Federation of Hillside & Canyon v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261; *Katzeff v. California Dept. of Forestry and Fire Protection* (2010) 181 Cal.App.4th 601, 612; *Lincoln Place Tenants Assn v. City of Los Angeles* (2005) 130 Cal.App.4th 1491.)

The heavy reliance on Project PDFs and the future imposition of conditions also improperly compresses the DEIR's disclosure and analysis functions. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 655–656.) A "mitigation measure cannot be used as a device to avoid disclosing project impacts." (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 663–664.) Here, the DEIR claims that the PDFs are part of the Project itself and fail to assess the impacts of the Project without these PDFs. But, a **mitigation measure is not part of the project**. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656 & fn. 8.) An EIR cannot incorporate "the proposed mitigation measures into its description of the project and then conclude [] that any potential impacts from the project will be less than significant." (*Id.* at 655–657.) The DEIR's shortcut is "not merely a harmless procedural failing...[it] subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation." (*Id.* at 658.)

Response to Comment No. 9-34

This comment incorrectly states that the Draft EIR disguises mitigation measures as PDFs, and suggests they are unenforceable. The proposed PDFs are not intended to be mitigation and do not "mitigate" any significant impacts but are integral features of the Project (i.e., they are part of the Project that is analyzed in the Draft EIR). By definition, mitigation measures are not part of a project's design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are necessary to reduce environmental impacts.

Furthermore, as is the case with every EIR published by the City, the proposed PDFs would be included in the Project's Mitigation Monitoring Program (see Section IV of this Final EIR), along with details about the enforcement and monitoring agencies, timing, and action indicating compliance. Implementation of the Mitigation Monitoring Program would be required as part of the Conditions of Approval for the Project. All of the necessary and required impact analysis is contained in the Draft EIR. Accordingly, the PDFs are fully described, and their effectiveness in reducing or avoiding potential impacts are analyzed in the Draft EIR, consistent with CEQA and *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 (per *Lotus*, concluding that an impact is less than significant without describing how avoidance and minimization measures of the project design prevent or minimize the impact, is not legally adequate).

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project potential environmental impacts under CEQA.

Comment No. 9-35

E. The Project Will Worsen Existing Inadequate Emergency Response Times.

The Fire Department has disclosed that emergency response times for the Project site are already inadequate, specifically stating that "fire protection would be considered inadequate" due to excess distance to the nearest fire station. (DEIR App. K, p. 3, emphasis in original.) As set forth above, the Project would result in worsening LOS on streets surrounding the Project site. This will worsen the already inadequate fire protection for the Project site and surrounding residences and business. The DEIR must disclose this significant emergency response impact.

Response to Comment No. 9-35

The phrase from LAFD's August 6, 2021 letter included as Appendix K of the Draft EIR that is cited by the commenter is not directed at emergency response times. Rather, it is directed at LAMC criteria regarding distance from a fire station. As discussed on page IV.J.1-12 of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, LAMC Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. LAMC Section 57.512.2 and Table 57.507.3.3 further provide that where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems. As discussed on page IV.J.1-23, based on this LAMC criteria regarding response distance, the Project Site would be located outside of the 1.0-mile response distance from a fire station with an engine company but would be located within the 1.5-mile response distance from a fire station with a truck company. Therefore, per LAMC Sections 57.507.3.3 and 57.512.2, rather than relying upon potential

exemptions, the Project would be required to include automatic fire sprinkler systems in all structures, in addition to the fire protection features listed in LAFD's inter-departmental correspondence regarding the Project (see Appendix K of the Draft EIR). While the LAFD letter states that the Project would exceed the LAFD-required response distance for a fire station with an engine company, LAFD's letter concludes on page 6 that "[t]he inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level." Therefore, as concluded in the Draft EIR, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As such, Project impacts related to fire protection were determined to be less than significant in the Draft EIR. Refer to Appendix FEIR-12 of this Final EIR, which confirms the Draft EIR's less than-significant conclusion.

With regard to response times, as discussed on page IV.J-16 through IV.J-18 of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response. The response times for January 2021 to December 2021 are shown in Table IV.J.1-4 on page IV.J.1-17 of the Draft EIR. According to LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is only one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and LAFD's judgment for needs in a specific area. If the number of incidents in a given area increases, it is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. As stated on page IV.J.1-5 of the Draft EIR, "[i]n *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have 'a constitutional obligation to provide adequate fire protection services.'" In conformance with the California Constitution Article XIII, Section 35(a)(2), the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services. Thus, the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project to mitigate. Also refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for further discussion of traffic congestion as it relates to emergency access, including emergency response times. As described therein, as part of the non-CEQA transportation analysis, Section 5B of the Transportation Assessment (Appendix M.1 of the Draft EIR) details the LOS operations at the 31 study intersections selected for operational evaluation. As shown in Table 18 of the

Transportation Assessment, upon anticipated Project completion in 2026, several intersections on arterial streets would operate at LOS E or F before and after the addition of Project trips. The Project would not cause any location to change from LOS D or better to LOS E or F during either peak hour.

As shown in Figure IV.J.1-1 in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, the two closest fire stations to the Project Site are Fire Station Nos. 61 and 41. Typically, the emergency vehicle response times are most influenced by severe congestion at the key signalized intersections along a response route. Figure II-3 within Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion above illustrates the locations of the LOS E or F intersections along the key corridors for emergency access: Fairfax Avenue and 3rd Street. As shown in Figure II-5, the intersection of Beverly Boulevard and Fairfax Avenue is the only intersection south of Melrose Avenue that would operate at LOS E for Fire Station No. 41 emergency vehicles. Use of the alternate route for Fire Station No. 41 vehicles would avoid this intersection. In addition, emergency vehicles approaching the Project Site from Fire Station No. 61 would experience a LOS E or F at the intersection of 3rd Street and Fairfax Avenue, although this location could be avoided by using the alternate route northbound on The Grove Drive.

Comment No. 9-36

III. Feasible Less Impactful Alternatives Should Be Adopted Instead of the Proposed Project.

CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would “avoid or substantially lessen” the project’s significant effects. (Pub. Resources Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 350.) An alternative need only avoid or substantially lessen any one of a project’s significant impacts to be considered environmentally superior. (CEQA Guidelines § 15021, subd. (a)(2).) The finding that “[t]here is no feasible way to lessen or avoid the significant effect...” of a project must be supported by substantial evidence. (Guidelines §§ 15043, 15093, subd. (b).) An alternative must be “truly infeasible” for its rejection to be legally valid under CEQA. (*City of Marina, supra*, 39 Cal.4th 341, 369.) CEQA defines feasible as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.” (Pub. Resources Code § 21061.1.)

We urge the City to comply with CEQA’s requirements by adopting feasible, less impactful alternatives instead of the Proposed Project. Alternative 2 would allow for modernization and renovation of the existing facilities without overhauling the Project site’s land use designations and creating an unnecessary Sign District. It would also provide greater

specificity of the Project itself by providing a concrete project proposal and eliminating ill-defined conceptual development scenarios. Thus, we support adoption of Alternative 2.

Response to Comment No. 9-36

Refer to Response to Comment No. 9-8. Alternative 2 does not avoid or substantially lessen any of the Project's significant and unavoidable impacts. It should also be noted that there were no significant impacts associated with the Project's Sign District. Refer also to Topical Response No. 16, Project Alternatives Analysis, for a discussion of how the Draft EIR presented a reasonable range of alternatives to avoid or substantially lessen the significant impacts of the Project while focusing on attaining the Project objectives, and how each such alternative was deemed infeasible. Note that this comment does not properly interpret caselaw and the CEQA Guidelines. *City of Marina* stated that mitigation measures, rather than alternatives, must be "truly infeasible" to be rejected. Mitigation measures are not at issue here. Furthermore, CEQA Guidelines Section 15021(a)(2) states that "[a] public agency *should* [emphasis added] not approve a project as proposed if there are *feasible* [emphasis added] alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment." Thus, an alternative still needs to be *feasible*, and the Draft EIR reasonably determined that, of the reasonable range of alternatives presented, none were feasible.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5 and 9-12 regarding how the Project Description fully complies with CEQA.

Comment No. 9-37

IV. Conclusion

For all of the reasons set forth above, Save Beverly Fairfax finds the DEIR to be wholly inadequate. The DEIR simply cannot provide meaningful information that fulfills CEQA's purpose of informed decisionmaking until a draft Specific Plan is prepared, and the issues described in this letter are resolved. We thus urge the City to reject this DEIR. If this Project does move forward as proposed, which we urge the City not to allow, a revised DEIR must be recirculated to address the many failings described herein.

Response to Comment No. 9-37

This comment summarizes the commenter's concerns addressed above and expresses opposition to the Project. As demonstrated in Response to Comment Nos. 9-1 through 9-36, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding

recirculation. The comment is nevertheless noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 9-38

Additionally, we ask that you inform us of any future Project notices pursuant to Public Resources Code section 21092.2 and applicable Municipal Code requirements. We further request that you retain all Project related documents including correspondence and email communications as required by CEQA. (*Golden Door Properties, LLC v. Superior Court of San Diego County* (2020) 52 Cal.App.5th 837 [agency “must retain writings”].)

Response to Comment No. 9-38

The commenter has been added to the mailing list for the Project and will receive all future public notices regarding the Project prepared by the City. In addition, the City will continue to properly maintain the administrative record for the Project.

Comment No. 9-39

Thank you for your time and consideration in this matter.

Response to Comment No. 9-39

This concluding comment is noted for the administrative record.

Comment Letter No. 10

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Comment No. 10-1

On behalf of Save Beverly Fairfax, we provide the following additional comments on the draft environmental impact report (DEIR) for the Television City 2050 Specific Plan project (the “Project” or TVC 2050 Project”) regarding cut-through traffic impacts. As set forth in our August 25, 2022 letter, the DEIR improperly defers a full analysis of these cut-through traffic impacts to an ill-defined post-EIR process. These cut-through traffic impacts must be analyzed and mitigated prior to any Project approval.

Additionally, in order to prevent impacts to the neighborhood located north of the Project site, which includes the Beverly Fairfax National Register Historic District, the analysis of cut-through traffic in the North Neighborhood must be thorough. To do so, the cut-through analysis must address all potential impacted streets, including: Orange Grove Avenue, Ogden Drive, Genesee Avenue, Spaulding Avenue, Stanley Avenue, Curson Avenue, Sierra Bonita Avenue, Gardner Street. The DEIR Appendix M identifies the potential for increased cut-through traffic on all of these streets. (DEIR App. M, pp. 170–171.) Once the DEIR is revised to include trip distribution assumptions supported by substantial evidence, as set forth in Save Beverly Fairfax’s previous comments, a more complete analysis of cut-through trips can be assessed and mitigated.

Thank you for your time and consideration in this matter.

Response to Comment No. 10-1

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR), the Project’s NTMP, the timing and preparation of the NTMP, the boundaries of the NTMP areas, and why the preparation of an NTMP does not represent deferred mitigation and no mitigation is required. As stated therein, a project’s effect on automobile delay, including cut-through trips, is not an impact under CEQA, and,

therefore, there are no significant impacts related to automobile delay that require mitigation under CEQA.

The cut-through analysis included the streets that have the potential to experience a level of cut-through traffic that rises to the City's non-CEQA thresholds for requiring an NTMP. This included five of the streets noted in the comment. Additional streets farther to the east, including Curson Avenue, Sierra Bonita Avenue, and Gardner Street, may sporadically carry a small number of additional trips as a result of the Project, but none would approach the City's minimum threshold of 120 cut-through trips per day (which is over 1 percent of the Project's net increase of approximately 9,733 daily trips as shown in Table 13 of the Transportation Assessment [included in Appendix M.1 of the Draft EIR]).

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant impact on the historic integrity of the Beverly Fairfax Historic District.

Comment Letter No. 11

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Comment No. 11-1

These comments are submitted on behalf of the Beverly Wilshire Homes Association in connection with the draft environmental impact report (DEIR) prepared for the TVC 2050 Specific Plan ("Project"). The Beverly Wilshire Homes Association is a non-profit, incorporated organization of property owners, residents and businesses within the area bounded by La Brea to La Cienega and Rosewood to the north side of Wilshire Blvd. From 1956 to the present, the Association has been the voice of the community. The Association's mission is to improve the quality of life for its members and the community.

Response to Comment No. 11-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 11-2

If approved, the TVC 2050 Specific Plan would permit up to 1,626,180 square feet of new development at the existing 25-acre Television Studio site on top of the retention of up to 247,820 square feet of existing uses, for a total of nearly 1.9 million square feet of development. While the proponent claims that the Project is critical to maintaining local television production, the 1.6 million square feet of additional development is not limited to television production. Instead, these allowable uses include retail, parking, and general office uses, as well as the sound stages, production support, and production offices television production requires. Critical to the community, the Project would establish a Sign District to expand allowable signage and amend the General Plan to designate the site as a Regional Center, allowing vast increases in development.

Response to Comment No. 11-2

As stated on page II-10 in Section II, Project Description, of the Draft EIR, the purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site. An operationally feasible balance of studio and studio-related uses is required for a successful modern studio. Refer to Topical Response No. 4, Appropriateness of Economic Objective, for additional information. The proposed development program (Table II-2 of the Draft EIR) includes an operationally feasible balance of studio uses to meet modern production needs. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the permitted studio uses. As demonstrated therein, the uses that would be permitted under the Preliminary Draft Specific Plan are consistent with the studio-related objectives of the Project.

The commenter mischaracterizes the proposed Regional Commercial designation as allowing increases in development. Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial land use designation and its relation to the size of the Project.

The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 11-3

The Project's scale, which would more than double the current development on the site, exceeds the appropriate scale for the site and the neighborhood. Project heights could reach 225 feet. It would be twice the size of the Beverly Center and twice as tall.

Response to Comment No. 11-3

Regarding the scale of the Project, the Project's proposed FAR of 1.75:1 is an approximately 17-percent increase from the 1.5:1 FAR currently permitted by existing zoning. Further, a 1.75:1 FAR is compatible with the surrounding neighborhood and is much smaller than the FAR permitted for surrounding properties. The permitted FAR for The Grove and The Original Farmers Market is 3:1 to 6:1 for individual parcels (1.5:1 FAR sitewide). The Broadcast Center Apartments has an FAR of approximately 2:1. Further, residential areas farther to the north and west of the Project Site are permitted an FAR of 3:1. The Beverly Center, which is mentioned in this comment, has an FAR of 2.99:1 and is approximately 122 feet in height.¹⁰⁴ The commenter's assertion that the Project would be

¹⁰⁴ Information about existing floor area from Case Nos. ZA-2018-3008-PAB and ZA-1994-0656-PAB-PA. Please note that the original approval for the Beverly Center is not available online.

twice the size, when comparing FAR, of the Beverly Center and twice as tall is incorrect. In addition, the Project would impose height, frontage, and stepback requirements that are not currently required under the existing zoning code. Moreover, there are several high- and mid-rise buildings located less than 1 mile from the Project Site, as set forth in Table II-23 on page II-315 of this Final EIR.

Refer to the analysis provided on pages IV.H-39 through IV.H-57 of Section IV.H, Land Use and Planning, of the Draft EIR, and Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, which show that the Project would not conflict with applicable land use plans and policies, including those that specifically address compatibility with surrounding land uses.

Regarding Project height, refer to Response to Comment No. 9-16. As part of the proposed Specific Plan, height zones with specified height limits would be established to regulate building heights throughout the Project Site. Refer to Figure II-5 and pages II-17 through II-20 in Section II, Project Description, of the Draft EIR. As shown therein, Height Zone A, which extends 430 feet along Beverly Boulevard in the central/northern portion of the Project Site, would be limited to a 58-foot height limit, and much of the Project Site would be subject to a base height limit of 88 feet as measured from Project Grade, consistent with the height of the existing HCM onsite. The base height limit would be augmented with maximum height limits in limited portions of certain height zones. Height Zone B, located within the southeastern portion of the Project Site adjacent to the existing eight-level parking structure at The Grove, would have a maximum height limit of 130 feet. Height Zone C, located in the western, northwestern, and northeastern portions of the Project Site, would have a base limit of 88 feet with a maximum height of up to 160 feet within up to 40 percent of the height zone area. Height Zone D, located within the more central area of the Project Site, would have a base height limit of 88 feet with a maximum height limit of 225 feet within up to 40 percent of the height zone area. In addition, Height Zone E is a rooftop zone along the northern façades of the Primary Studio Complex that limits any rooftop addition to a height limit of 84 feet. Height Zone F prohibits the construction of any new occupiable building to protect the Primary Studio Complex. Internal setback requirements are also included for new development adjacent to the Service Building. Overall, these height zones protect the HCM, open up views of the HCM from Beverly Boulevard, and concentrate building mass and height toward the center of the Project Site. Also note that the Specific Plan would establish frontage area requirements that function as buffers and transitional space around the Project Site perimeter. Among others, a 30-foot-wide frontage area would be provided along the Project Site's edge adjacent to the Broadcast Center Apartments and along a portion of the southern property line as shown in Figure II-5, Height Zone Map, within Section II, Project Description, of the Draft EIR. Additional figures have also been added as part of this Final EIR. Refer to Figures II-4(a) and II-4(b) within Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for aerial renderings depicting the Conceptual Site Plan. In addition,

**Table II-23
Height of Buildings in Vicinity of Project Site**

Site	Building Height	Distance from Project Site (Approx.)
Park La Brea 6200 W. 3rd Street	147 feet, 13 stories	0.36 mile
One Museum Square 640 S. Curson Avenue	245 feet, 21 stories ^a	0.66 mile
SBE Building 5900 Wilshire Boulevard	435 feet, 31 stories ^b	0.75 mile
6100 Wilshire Boulevard	201.5 feet, 16 stories ^c	0.76 mile
^a CPC-2013-193-ZC-CU-ZV-BL-CDO. ^b Building Permit No. 1969LA80993. ^c Building Permit No. 1984LA90564. Source: Eyestone Environmental, 2023.		

building stepbacks would apply to those portions of buildings in Height Zones C and D that are greater than 88 feet in height. Also note that the height zones do not represent the actual development footprint of the Project buildings. Rather, new buildings would occupy only a portion of the development envelope permitted in each height zone. Overall, as shown in the additional conceptual renderings provided in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the height zones, frontages, stepbacks, and setback requirements related to construction next to the HCM protect the HCM open up views of the HCM from Beverly Boulevard, and concentrate building mass and height toward the center of the Project Site. Furthermore, proposed building heights would be compatible with existing building heights in the Project vicinity that include a range of low- to high-rise buildings. Also note that the proposed height zones establish building height maximums that do not currently exist within the Project Site.

Comment No. 11-4

The Project contains no enforceable standards to prevent increasing neighborhood traffic and parking scarcity.

Response to Comment No. 11-4

As discussed in Topical Response No. 9, Neighborhood Traffic Management Plan, the Project would implement an NTMP that includes measures to minimize potential cut-through trips.

As discussed in Topical Response No. 13, Parking, the proposed parking supply would be sufficient to accommodate the peak parking demands of the Project and would prevent spillover parking. Please note that neither cut-through trips nor adequacy of parking supply are environmental impacts under CEQA. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 11-5

The Project would excavate 772,000 cubic yards of dirt, resulting in unanalyzed air quality impacts and requiring dewatering that the DEIR assumes, without analysis, will not cause adverse impacts. Unfortunately, however, the Project's size is not its greatest problem.

Response to Comment No. 11-5

The air quality analysis within Section IV.A, Air Quality, of the Draft EIR fully accounts for the 772,000 cubic yards of export anticipated as part of construction of the Project. Refer to page IV.A-60 of Section IV.A, Air Quality, of the Draft EIR and the supporting calculations included in Appendix B of the Draft EIR.

With regard to dewatering, as discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering.

The Draft EIR evaluated potential impacts associated with temporary construction dewatering. As discussed on page IV.G-9 of Section IV.G, Hydrology and Water Quality, of the Draft EIR, the discharge of groundwater as a result of dewatering would be required per regulatory requirements to consider various wastewater disposal methods and provide a flow diagram of the influent to the discharge point.¹⁰⁵ As described below, the actual composition of the dewatered groundwater (i.e., the dissolved chemical composition and sediment load) produced during the temporary construction dewatering are fundamental data elements of the feasibility study for evaluation of alternative disposal methods that will be determined during future groundwater dewatering pumping tests conducted during the City's regulatory building permit process. As per LADBS (Information Bulletin Number P/BC 2020-131), when temporary dewatering is required as part of construction, industrial wastewater discharge permits are required by the City of Los Angeles Bureau of Sanitation for discharge of the pumped water into the public sewer system. If the water is to be discharged into the public sewer system, the City of Los Angeles Bureau of Sanitation is

¹⁰⁵ Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2013.

concerned with (1) the quality of the discharge; and (2) the capacity and hydraulics of the public sewer system to accept the discharge. If temporary dewatering pumps are to discharge into the storm drain system (which eventually discharge directly into surface waters such as streams or oceans), National Pollutant Discharge Elimination System (NPDES) permits are required from the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Draft EIR evaluated surface water quality construction impacts on pages IV.G-28 to IV.G-30 in Section IV.G, Hydrology and Water Quality, of the Draft EIR. With regard to dewatering during construction, as stated therein, discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of permit requirements. During construction, temporary dewatering pumps and filtration would be utilized in compliance with the discharge permit. These temporary systems would comply with all applicable permit requirements related to construction and discharges from dewatering operations, as well as the LARWQCB Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. With the implementation of site-specific BMPs included as part of the SWPPP and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. As such, with compliance with discharge permit requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant.

The Draft EIR also evaluated groundwater quality construction impacts on pages IV.G-30 to IV.G-32 of the Draft EIR. With regard to dewatering, as stated therein, any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements, and, therefore, groundwater quality would not be negatively affected by potential dewatering activities.

Temporary construction dewatering impacts are also analyzed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As stated on page IV.F-44 of the Draft EIR, during construction-phase dewatering, any discharge of groundwater would comply with the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such regulatory requirements, the extracted groundwater would be chemically analyzed to determine whether the groundwater is contaminated and the appropriate treatment and/or disposal methods. Thus, with compliance with applicable regulations and requirements, Project construction activities would not create or exacerbate a significant

hazard to the public or the environment involving the handling and disposal of extracted groundwater.

In addition, temporary construction dewatering impacts are analyzed in Section IV.D, Geology and Soils, of the Draft EIR. As stated on page IV.D-24 of the Draft EIR, although dewatering operations are expected during construction, such activities would be limited and temporary. Therefore, impacts related to subsidence would be less than significant. In addition, in response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure was conducted by Geosyntec Consultants and is provided in Appendix FEIR-13 of this Final EIR (Dewatering Report) for informational purposes. As discussed in the Dewatering Report, the total amount of groundwater that would be dewatered during the temporary dewatering is approximately 26.4 million gallons (40,600 gallons per day [gpd]). In comparison, the maximum projected operational water demand for the Project is approximately 269,123 gpd (see Table IV.M.1-6 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR). The Dewatering Report confirms the conclusion in the Draft EIR that impacts associated with temporary dewatering activities during construction would be less than significant. Also refer to the Subsidence Technical Memorandum prepared by Geotechnologies included as Appendix D of the Dewatering Report, which confirms the Draft EIR's conclusion that subsidence impacts associated with temporary dewatering would be less than significant.

Comment No. 11-6

Although termed a “*Specific Plan*” by the proponent and the City, the TVC 2050 Specific Plan is vague. Instead of being clearly defined, Project uses are interchangeable to the point that it is unclear what exactly the proponent plans to build. The result is essentially a 20-year blank check for 1.6 million new square feet of pre-approved development, that can be up to 225 feet tall, in one of the City's densest corridors. From a legal perspective, the Project description is inadequate and results in the DEIR's failure to adequately disclose, analyze, and mitigate the potentially significant and adverse environmental impacts of the Specific Plan. The City cannot describe, discuss, and mitigate what it does not yet know. CEQA provides that an EIR be a document of accountability, full of useful information and providing full disclosure about a Project's consequences. The EIR is woefully uninformative.

If the City wishes to proceed with this Project, the TVC 2050 Specific Plan must be defined in a CEQA-compliant fashion, and an EIR that discloses, analyzes, and mitigates the potential impacts of that well-defined project must be prepared and circulated. However, in the interest of preserving its legal rights if the City chooses to certify this inadequate EIR,

the Association provides the following CEQA comments. The Association also joins in the comments of Save Beverly Fairfax, submitted to the City on August 25, 2022.

Response to Comment No. 11-6

Refer to Response to Comment Nos. 5-3 and 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how Section II, Project Description, of the Draft EIR was completed in full compliance with CEQA, how all of the physical parameters of the proposed Specific Plan are fully consistent with physical parameters in Section II, Project Description, of the Draft EIR, how the environmental impacts of the Project are fully accounted for, the distinct set of studio-related uses proposed by the Project, and the limited Land Use Exchange Program proposed as part of the Project to respond to future demands of the entertainment industry. Also refer to Response to Comment Nos. 9-16 and 11-3 regarding the proposed height zones that establish a range of maximum building heights across the Project Site that are compatible with surrounding uses.

As discussed in Topical Response No. 1, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 and specifically Table II-2, Proposed Development Program, on page II-13). Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Contrary to this comment, the Draft EIR is comprehensive and was completed in full compliance with CEQA. Refer to Letter No. 9 for responses to the comments referenced in this comment.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-7

I. The DEIR Fails to Adequately Disclose, Analyze, and Mitigate the TVC 2050 Specific Plan’s Adverse Environmental Impacts as Required by CEQA.

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project’s significant environmental effects so that decision-makers and the

public are informed of these consequences before the project is approved to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the “heart of CEQA” and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) In part because the DEIR fails to adequately describe the Project, the DEIR fails to adequately disclose, analyze, and mitigate the Project’s significant adverse environmental impacts.

Although an EIR need not be perfect, the City “must use its best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines § 15144.) If important information cannot be obtained, the EIR must explain why. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519–522.) That the EIR has failed to define a Project is not a sufficient reason to omit the required environmental disclosures.

Throughout the administrative process, members of the public, businesses, and citizen groups have documented their concerns about the vagueness of the Project. While the Association appreciates the City’s efforts to incorporate the goals of a broad stakeholder community, the resulting Specific Plan is unclear about what exactly can or will be built. Consequently, the Draft EIR prepared for this Specific Plan fails to adequately define a “project” as needed for CEQA review. The failure to define the Project cascades into the DEIR’s failure to provide sufficient information about the Project’s likely environmental impacts. Without adequate disclosure, the DEIR further fails to adequately analyze and mitigate the Project’s impacts. In short, the Project, as described, is not ripe for environmental review.

Response to Comment No. 11-7

The City is fully committed to carrying out the EIR process as required by CEQA, while making the best effort to disclose all Project information, analysis, and potential environmental impacts therein. As explained in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, Section II, Project Description, of the Draft EIR fully complies with CEQA’s requirements related to preparation of a project description and the Draft EIR fully discloses, analyzes, and mitigates the Project’s significant adverse environmental impacts as required by CEQA.

This comment provides no substantial evidence to demonstrate that the Draft EIR omits “the required environmental disclosures.”

Contrary to this comment, Section II, Project Description, of the Draft EIR is not vague. Rather, as explained in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project Description is accurate, stable, and finite and

provides sufficient details to fully evaluate the environmental impacts of the Project. Also refer to Response to Comment Nos. 5-3 and 9-13 and Topical Response No. 1 regarding how all the physical parameters of the proposed Specific Plan are fully consistent with physical parameters in Section II, Project Description, of the Draft EIR. The statement in this comment that the Project is not “ripe” for environmental review is incorrect (refer to Topical Response No. 1) but is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 11-8

A. The City’s Enforcement of a Deadline for Public Comment That Predates the Preparation of the Specific Plan Violates the Spirit of CEQA’s Public Comment Provisions.

The EIR was prepared to analyze the TVC 2050 Specific Plan. The review of a specific plan under CEQA requires availability of that plan to the City and to the public. Using the Specific Plan as a guide, the City and members of the public review the DEIR to confirm that components of the Specific Plan that may have adverse environmental impacts are disclosed, analyzed, and, if necessary, mitigated in the concurrently available DEIR. However, the Department of City Planning has told us that the Specific Plan has not yet been drafted and is, therefore, not available for public review. Thus, in a seemingly unprecedented move, the City is requiring public review and comment regarding whether the environmental review is adequate for a Specific Plan *that is not yet available for public review*.

The City’s process turns on its head one of the basic tenets of CEQA, that of public participation. As the Court explained in *Lincoln Place Tenants Assn. v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 443–444, “The fundamental goals of environmental review under CEQA are information, participation, mitigation, and accountability.” (Citations omitted.) Other courts have confirmed that environmental review derives its vitality from public participation. (See, *Ocean View Estates Homeowners Ass’n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.) The City’s failure to provide—or to prepare—the Specific Plan prior to circulation of the DEIR for public comment “precludes ‘informed decisionmaking and informed public participation’” because the public cannot provide meaningful comment when the project has not been identified. (*Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17 Cal.App.5th 277, 290 [citations omitted]; *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17–19.)

For this reason, and for the reasons detailed below, the City must release the draft Specific Plan and recirculate the DEIR for comment to enable meaningful public comment. The City’s failure to do so thus far violates CEQA.

Response to Comment No. 11-8

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the fact that a draft Specific Plan was not required to be included as part of the Draft EIR and how all of the physical aspects of the proposed Specific Plan are consistent with those set forth in Section II, Project Description, of the Draft EIR. As such, potential impacts associated with the physical aspects of the proposed Specific Plan are fully addressed in the Draft EIR and there is no substantial evidence to support the comments that “informed decisionmaking and informed public participation” has been precluded and the case law cited in this comment is not applicable to the Draft EIR. Rather, the Draft EIR is comprehensive and has been completed in full compliance with CEQA. Refer to Topical Response No. 1 for a detailed discussion of how the Project differs from the project description at issue in *Millennium*.

Also refer to Response to Comment No. 32-3 regarding how public noticing was completed in full compliance with CEQA.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-9

B. Since There is Not Yet a Specific Plan, the DEIR Does Not Adequately Define the Project.

As discussed above, the DEIR attempts to review a project that does not yet exist. Adequate CEQA review requires a complete and accurate project description. It has long been established that “[a]n accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192–193.) To the contrary, a “curtailed or distorted project description may stultify the objectives of the reporting process” and does not allow “outsiders and public decision-makers [to] balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative) and weigh other alternatives in the balance.” (*Ibid.*)

Since the Specific Plan is not yet fully formed, the City cannot ensure that the DEIR’s project description matches the Project, or that the EIR analyzes all aspects of that Project. The EIR’s “bona fide subject” must be “[t]he defined project and not some different project.” (*Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Assn.* (1986) 42 Cal.3d 929, 938.)

CEQA also prohibits a project description that fails to describe key elements of a Project. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35.) Providing the Specific Plan to the public at a later time is insufficient, as, “CEQA’s informational purpose ‘is not satisfied by simply stating information will be provided in the future.’” (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th at 440-41).

Response to Comment No. 11-9

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the fact that a draft Specific Plan was not required to be included as part of the Draft EIR, how Section II, Project Description, of the Draft EIR includes the physical components of the proposed Specific Plan, how Section II, Project Description, of the Draft EIR fully complies with CEQA, including CEQA’s requirement for an accurate, stable, and finite project description, and does not delay the delivery of information relevant to the CEQA analysis.

Comment No. 11-10

The DEIR attempts to rely on a vague and unstable project description that fails to clarify the type and timing of development proposed. The DEIR provides standards and guidelines it claims will be in the draft Specific Plan, but, without a Specific Plan available for review, these claims cannot be confirmed. (DEIR pp. I-9 to I-10, stating the unwritten [“primary development regulations set forth in the Specific Plan would address land use, design, historic preservation, childcare, alcohol sales, and parking, as well as associated implementation procedures.”].) Beyond the limit of total development square footage, there are few limits on the amount of each type of development allowed, or even the types of development allowed beyond “all [] uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.” (DEIR pp. II-15.) Given that the Specific Plan has not yet been drafted, the Project appears to permit any allowable use in the C2 zone. The DEIR contains this exhaustive list of allowable uses:

[M]otion picture, television, and broadcast studios and related incidental uses, including, but not limited to: production activities; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, eSports, and media production; recording and broadcasting; sound labs; film editing; film video and audio processing; sets and props production; computer design; computer graphics; animation; and ancillary facilities related to those activities. The following types of related uses and facilities would also be permitted, as detailed in the Specific Plan: basecamps, communication facilities, conference facilities, modular offices and trailers, studio support facilities, parking, various ancillary commercial and retail uses to serve the on-site

employees and visitors, catering facilities, special events, audience and entertainment shows, museum exhibits and theaters, childcare and educational facilities, fitness facilities, emergency medical facilities to serve the on-site employees and visitors, fueling stations and vehicle repair related to on-site uses and activities, infrastructure, maintenance and storage facilities, mills/manufacturing, sleeping quarters for certain on-site personnel, recreational facilities, restaurants and special event areas including the sale of alcoholic beverages, security facilities, signs, storage and warehouses, helipad, ***and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.***

(DEIR, II-15, emphasis added.) Notably, the public cannot know which C2 uses are prohibited because there is not yet a Specific Plan. The DEIR lists possible amounts of studio and production-related development but confirms that the “ultimately constructed” mix “will depend upon market demands.” (DEIR, p. II-13.) The DEIR also expressly provides for exchanges of square footage between land uses, further blurring the lines between land use types and amounts. (DEIR, p. II-16.) There are no limits provided for production support floor area. The Project could conceivably build largely retail or all office, if later desired. Thus, despite being sold to the City and to the public as a necessary means of ensuring continued television production in Los Angeles, the Project contains no commitments to building the production space promised.

Response to Comment No. 11-10

These comments are similar to those raised in Comment Nos. 5-3, 5-6, 9-13, and 9-14. As explained in Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, a draft Specific Plan was not required to be part of the Draft or Final EIR, and the physical aspects of the proposed Specific Plan were fully accounted for in Section II, Project Description, of the Draft EIR, as demonstrated in Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. In addition, as explained in Response to Comment No. 5-6 and Topical Response No. 3, Permitted On-Site Uses, the permitted uses on-site will only include the five studio uses discussed throughout the Draft EIR (i.e., sound stage, production support, production office, general office, and retail) and associated ancillary uses, and these uses have all been addressed in the EIR. The C2 zone uses (which are currently permitted) have been removed from the list of permitted uses within Section II, Project Description, of the Draft EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Please note that retail would be limited to 20,000 square feet (less than 2 percent of the total permitted floor area), and production office and general office would be limited to a maximum of 700,000 square feet each, contrary to this commenter’s assertion. As discussed on pages II-10 to II-11 in Section II, Project Description, of the Draft EIR, the Project objectives include optimizing the currently

underutilized studio and maximizing studio production capabilities by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities, production office, and general office. The Project, as described in Section II, Project Description, of the Draft EIR, includes an operationally feasible balance of studio uses to meet modern production needs.

Also refer to Response to Comment Nos. 9-13 and 9-14 regarding the clear limitations on floor area for each of the permitted uses, the requirement that production support uses cannot exceed 450,000 square feet, and how the limited land use exchanges have been fully accounted for in the impact analyses throughout the Draft EIR. As discussed therein, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project, including a proposal that involves a land use exchange, or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 11-11

Nor does the Project actually commit to renovating the sound stages allegedly at the center of the Project. The DEIR claims the four existing sound stages “would be renovated and modernized to the extent feasible, subject to industry market demand.” (DEIR, p. II-17.) The qualifications of “to the extent feasible” and “subject to industry market demand” provide no assurance that these promised renovations will ever actually occur.

Response to Comment No. 11-11

Refer to Response to Comment No. 9-15 regarding the proposed renovation of the sound stages.

Comment No. 11-12

A land use plan is provided, but, again, it is conceptual and merely “illustrates one possible development scenario that could be developed.” (DEIR pp. II-13, II-14.) The DEIR also discusses design, parking, and height standards, but it is unknown what these standards will be applied to, or whether they are actually contained in the as-yet completed Specific Plan. The DEIR also undercuts its proposed height limits (already a massive increase at

up to 225 feet), stating, “height zones do not represent the actual development footprint of Project buildings.” (DEIR, II-15, 16, 18.)

Response to Comment No. 11-12

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description was completed in full compliance with CEQA; Response to Comment No. 9-17 regarding design and architecture; Response to Comment No. 9-20 regarding parking; and Response to Comment No. 9-16 regarding building heights.

Comment No. 11-13

It is unclear whether the development will occur over the 32-month construction schedule proposed or the 20 years of the Development Agreement sought. (DEIR p. II-33.)

Response to Comment No. 11-13

Refer to Response to Comment No. 9-24 regarding the Project timeframe.

Comment No. 11-14

The only thing that is clear is that the Project would provide proponents with entitlements to build nearly 1.9 million square feet of development, nearly 2½ times what is currently located onsite, of a type to be determined later, at the proponent’s discretion.

Response to Comment No. 11-14

Refer to Response to Comment No. 9-14 regarding how the Draft EIR evaluated potential impacts associated with the Project and the maximum impact scenarios under the limited Land Use Exchange Program.

Comment No. 11-15

As to actual activities and what will happen when, little information is included. An EIR’s purpose is to eliminate this confusion:

The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it. The EIR is intended to

furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they-and the environment-will have to give up in order to take that journey.

(*NRDC v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.) The TVC 2050 Specific Plan EIR contains no such road map. Under any definition, the DEIR fails to contain a stable or finite project description. Without a clear Project to serve as the basis of environmental analysis, the DEIR cannot possibly provide the adequate disclosure, analysis, and mitigation of the Project's likely impacts required by CEQA. In effect, the DEIR provides only a "blurred view of the project," a deficiency that required rescission of the EIR and project entitlements in another Los Angeles development in the recent decision, *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 12–13 ("*Millennium*").

Response to Comment No. 11-15

This comment related to the purpose of CEQA is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 11-16

Like with the Millennium Hollywood Project, for which the Court found the EIR contained little "actual information" and no concrete development project, the TVC 2050 Specific Plan DEIR analyzes a conceptual building envelope and conceptual development possibilities (height zones, parking standards, and various aesthetic standards), but no concrete development project. (*Millennium, supra*, 39 Cal.App.5th 1, 18.) The Millennium Court characterized the design standards—standards that would conceivably be applied to some defined project in the future—as "a range of construction choices," not the required, defined project. (*Ibid.*) The Court concluded, "These concepts and development scenarios—none of which may ultimately be constructed—do not meet the requirement of a stable or finite proposed project." (*Id.* at 17–18.)

The City's approach seems to assume that this is sufficient for environmental review if proposed development is "within the envelope of impacts identified in this Draft EIR." (DEIR, II-16.) However, the Millennium Court roundly rejected the claim that, "so long as the worse-case-scenario environmental effects have been assumed, analyzed, and mitigated, and so long as no development takes place that exceeds those mitigation measures, CEQA's purpose has been fully satisfied." (*Id.* at 18.) Processing of the Project should cease until a stable and finite project description is provided, in the form of a

complete and publicly available Specific Plan, and that project description is incorporated into a recirculated DEIR.

The project description fails to provide adequate information regarding the activities allowed under the Specific Plan to allow for useful environmental review. The Project is essentially unripe. The Association understands the importance of flexibility in land use planning, but the document proposed here is a *Specific Plan*. It is not an imaginary plan. Importantly, the DEIR never discloses that the Specific Plan does not yet exist. The City must draft a Specific Plan that provides clear direction about the types of uses that will be permitted in order to provide at least a modicum of certainty in future planning. The DEIR should be revised as necessary and then recirculated for informed public comment.

Response to Comment No. 11-16

As demonstrated in Response to Comment Nos. 9-12, 9-14, 9-16, 9-20, and 9-24 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project is distinguishable from the project description at issue in *Millennium*. Also refer to Response to Comment No. 5-3 and Topical Response No. 1 regarding the fact that a draft Specific Plan was not required to be included as part of the Draft or Final EIR and how Section II, Project Description, of the Draft EIR describes the physical aspects of the proposed Specific Plan that are necessary to fully evaluate the potential impacts of the Project as required by CEQA, and environmental review is not premature.

With regard to recirculation, this comment letter does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-17

C. The DEIR Fails to Adequately Disclose, Analyze, and Mitigate Traffic Impacts.

The DEIR’s failure to provide a concrete and definite Project Description results in the DEIR’s inability to accurately or adequately predict, disclose, and mitigate the Project’s impacts with regard to traffic and circulation, emergency access, and general safety. The Project’s uses broadly include all uses allowed in the C2 zone, the locations of these undefined uses are unknown, and uses are interchangeable and may be transferred. While a thorough criticism of the Project’s likely impacts on traffic is premature at this point, the Association comments on what it can below.

Response to Comment No. 11-17

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how Section II, Project Description, of the Draft EIR was completed in full compliance with CEQA and includes sufficient information and details to analyze the environmental impacts of the Project. Also, refer to Topical Response No. 3, Permitted On-Site Uses, regarding the refined list of permitted uses within the Project Site. As described therein, the Specific Plan would not allow all uses in the C2 zone (even though these uses are currently permitted); rather, the Specific Plan would limit the permitted land uses to sound stages, production support, production office, general office, and retail. This has been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. In addition, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project includes a limited Land Use Exchange Program that would allow for limited increases in the amount of sound stage or production support floor area in exchange for equivalent decreases in the floor area of other permitted land uses. The Draft EIR's environmental analysis accounts for the maximum potential environmental impacts associated with buildout of the Project. For each environmental topic, in addition to analyzing the impacts of the proposed development program, the Draft EIR also analyzed the maximum impact scenario (i.e., the development scenario under the Land Use Exchange Program that would generate the greatest environmental impact). The Draft EIR evaluated the Project's transportation impacts in accordance with CEQA and the TAG and concluded that impacts would be less than significant. Refer to Section IV.K, Transportation, and Appendix M.1 of the Draft EIR. Also refer to Topical Response Nos. 8, Vehicle Miles Traveled, and 12, Safety and Congestion.

Comment No. 11-18

The Association, its members, and the larger neighborhood are deeply concerned that the Project will exacerbate traffic congestion on Fairfax, Beverly, La Brea Avenue, and 3rd Street. The DEIR claims that studio expansion is expected to generate an additional 787 vehicle trips during morning rush hour and an additional 855 trips during afternoon rush hour, but the variability in future uses makes this prediction speculative, at best. The DEIR also claims that the Project will include up to 5,300 parking spaces, but it fails to commit to any actual number of spaces, arrangement of spaces, or to even commit to providing these spaces onsite. As these areas already experience significant traffic congestion, without concrete and enforceable mitigation, the Project will worsen conditions, hurting residents and local businesses when Angelenos avoid the area due to traffic congestion and endangering anyone who must rely on slower emergency response times for police, fire, and ambulance services.

Response to Comment No. 11-18

Refer to Topical Response No. 12, Safety and Congestion, regarding vehicle congestion.

As discussed in Topical Response No. 9, Neighborhood Traffic Management Plan, a project's effect on automobile delay (including neighborhood traffic) is not an environmental impact under CEQA, and, therefore, there is no significant impact under CEQA and accordingly no mitigation is required. Nonetheless, a non-CEQA analysis of potential effects on neighborhood traffic is included in Section 5C of the Transportation Assessment, included as Appendix M.1 of the Draft EIR. As discussed therein, to minimize the Project's potential effects on cut-through trips, an NTMP would be implemented.

Refer to Topical Response No. 10, Trip Generation, regarding the trips the Project would generate.

With regard to parking, refer to Topical Response No. 13, Parking, and Response to Comment No. 9-28. As discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces based on the proposed parking ratios set forth in the proposed Specific Plan. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is no longer proposed, as it is not needed to accommodate the Project's peak parking demand; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and to Response to Comment Nos. 9-35, 26-147, and 35-134 regarding emergency response times.

Regarding the proposed uses, as discussed in Topical Response No. 3, Permitted On-Site Uses, the Specific Plan would permit five land uses—sound stage, production support, production office, general office, and retail—as well as ancillary and supportive sitewide uses. Thus, the assertion regarding variability in future uses is incorrect.

Comment No. 11-19

Outside of CEQA, the Project's traffic, traffic hazards, safety, and emergency response impacts must be analyzed for compliance with the Community Plan and applicable provisions of the Los Angeles Municipal Code.

Response to Comment No. 11-19

The Draft EIR appropriately focuses on the analysis of environmental impacts of the Project as required by CEQA. As part of the CEQA process, an analysis of the Project's consistency with the Wilshire Community Plan has been conducted, and the Project has been determined to be consistent with the Wilshire Community Plan, including the goals and policies related to traffic, safety, and emergency response. Refer to Table IV.K-2 beginning on page IV.K-58 of Section IV.K, Transportation, of the Draft EIR for an analysis of the Project's consistency with the applicable Wilshire Community Plan goals, policies and objectives regarding traffic, safety and emergency response. As shown therein, the Project does not conflict with the applicable Wilshire Community Plan goals, policies, and objectives regarding traffic, safety and emergency response. Also refer to pages IV.K-67 through IV.K-71 of Section IV.K, Transportation, of the Draft EIR for an analysis of the Project's consistency with the LAMC as it relates to transportation. As shown therein, the Project would meet applicable LAMC requirements.

Refer to Response to Comment No. 9-29 regarding traffic hazards.

Comment No. 11-20**1. Traffic Hazards are Not Analyzed.**

The DEIR fails to analyze traffic hazards. For example, the City has identified the intersection of Beverly Boulevard and Fairfax Avenue as a "high injury" intersection. The Project would worsen the Level of Service to level E, "poor" performance. Yet the DEIR fails to analyze whether the Project's diminution of Level of Service at this intersection significantly affects the level of hazard presented at this high-injury intersection. As discussed in the comments submitted by Save Beverly Fairfax, the DEIR also fails to analyze the potential traffic and safety/hazard impacts of queuing on surrounding streets while increased numbers of visitors to the expanded site wait for safety check point verification.

Response to Comment No. 11-20

Refer to Response to Comment No. 9-29 regarding the analysis of traffic hazards, the High Injury Network, LOS, and the adequacy of the queuing capacity at Project driveways.

Comment No. 11-21**2. Assumptions Made in the DEIR's Vehicle Miles Traveled Analysis Lack Support.**

The DEIR's traffic section and conclusions about the Projects impacts on traffic are based on an analysis of the Project's Vehicle Miles Traveled (VMT). Unfortunately, as discussed further in the comments submitted by Save Beverly Fairfax, the VMT analysis makes unsubstantiated assumptions about trip lengths, trip distribution, and VMT per employee. These assumptions must be substantiated, or the analysis must be repeated with supportable numbers, and the traffic analysis recirculated.

Response to Comment No. 11-21

Refer to Response to Comment No. 9-30 relative to the assumptions in the VMT analysis and trip lengths, Response to Comment No. 9-31 relative to trip distribution, and Response to Comment No. 9-32 relative to VMT per employee.

Also refer to Topical Response No. 8, Vehicle Miles Traveled, for a detailed discussion of the appropriateness of using the VMT Calculator and the trip length assumptions built into that tool (note: trip distribution is captured in the trip length assumptions), which were similarly used to develop thresholds of significance in compliance with the OPR Technical Advisory. The resultant work VMT per employee was calculated accurately and consistent with the methodology recommended in the OPR Technical Advisory and CEQA.

Comment No. 11-22**3. Analysis of Cut-Through Traffic Impacts is Improperly Deferred.**

The Association also joins Save Beverly Fairfax's concern about the DEIR's deferral of analysis of cut-through impacts. Although the DEIR seems to assume that the degradation of Project-area intersections to Levels of Service E and F will prompt motorists to take less-congested routes through the neighborhood, the DEIR never discloses this analysis to the public or to decisionmakers. The Association is particularly concerned about impacts to Hayworth, Edinburgh, and Laurel. That the Project will worsen traffic to the point that neighborhood streets will require mitigation is something that must be disclosed and discussed publicly before the Project may be approved. This goes to the safety of the neighborhood and its residents and to the general livability. It violates CEQA to assume later mitigation without first disclosing and analyzing the potential impact.

Response to Comment No. 11-22

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR), the Project's NTMP, the timing and preparation of the NTMP, the boundaries of the NTMP areas, and why the preparation of an NTMP does not represent deferred mitigation and no mitigation is required. As stated therein, a project's effect on automobile delay, including cut-through trips, is not an impact under CEQA, and, therefore, there are no significant impacts related to automobile delay that require mitigation under CEQA.

This comment incorrectly states that the Draft EIR does not disclose the potential impacts of cut-through traffic on local streets. The potential cut-through effects were evaluated in the Transportation Assessment (included in Appendix M.1 of the Draft EIR) in Section 5C as part of the non-CEQA analysis.

Regarding LOS and vehicle delay, refer to Response to Comment No. 9-29 and Topical Response No. 12, Safety and Congestion.

Hayworth, Laurel, and Edinburgh were included in the analysis of cut-through effects and the results are included in Table 22 on page 178 of the Transportation Assessment. Additionally, the three streets mentioned in the comment are included in the neighborhood area to the west of the Project Site which would be addressed as part of the NTMP. See Figure 26 on page 176 of the Transportation Assessment for the boundaries of the NTMP areas to be studied.

Comment No. 11-23**4. Haul and Construction Traffic Impacts are Not Disclosed, Analyzed, or Mitigated.**

The project requires export of 772,000 cubic yards of material (DEIR p. II-1) but the DEIR fails to disclose the number of truck trips that will be required for and associated with this level of movement. Based on the average size of trucks used for this purpose (10- to 13-ton capacity), the dirt export will require 60,000 to 100,000 trips by heavy construction vehicles. This level of construction traffic would need to proceed up Venice and Fairfax. Based on the location given in the DEIR, construction vehicles would be staged in and around Loyola High School, the Normandie Recreation Center, and St. Thomas the Apostle School on and near Venice Boulevard and near Kaiser Permanente Hospital. (DEIR p. II-35 [“In addition, the Project includes two potential off-site truck staging areas located within the City on the north side of Venice Boulevard, west of Guthrie Avenue and on the north side of Venice Boulevard, east of Normandie Avenue.”].)

The human health impacts, especially to school children, of construction vehicle traffic and staging must be analyzed, but were not. Diesel particulate matter is a known human carcinogen, as “[d]iesel exhaust also contains more than 40 cancer-causing substances.” (See, California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>.) In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 518 (“*Friant Ranch*”), the California Supreme Court agreed with the Court of Appeal that an EIR for a development “was inadequate under CEQA because its analysis failed to correlate the increase in emissions that the Project would generate to the adverse impacts on human health.” The Court continued, “a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact.” (*Id.* at 519.) This is absent here. The DEIR utterly fails to perform a *Friant Ranch*-type analysis correlating project activities with potential human health impacts for the area located near the Project site, or for the school-adjacent staging area several miles southeast. In fact, the EIR fails to provide **any** analysis of human health impacts. The City must perform the required analysis, revise the DEIR, and recirculate it for public review and comment.

Response to Comment No. 11-23

Contrary to this comment, the Draft EIR provides the number of truck trips that will be required for and associated with the export of 772,000 cubic yards of export. As shown on pdf page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, there would be approximately 640 daily truck trips over 185 working days during the excavation/foundation construction phase. Refer to Topical Response No. 14, Construction Vehicle Impacts. All haul truck staging would occur on-site per LADOT’s approval letter dated June 30, 2022 (see the LADOT Haul Route Approval Letter included in Appendix M.5 of the Draft EIR). The two off-site staging locations described and evaluated in the Draft EIR are no longer proposed. As such, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. The removal of the off-site haul truck staging locations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment No. 11-26 regarding *Sierra Club v. County of Fresno* (Friant Ranch).

Comment No. 11-24

D. The DEIR Fails to Provide Sufficient Information to Assess the Project’s Impacts on Parking.

The Project area already experiences heavy traffic, a substantial amount of which is caused by people looking for scarce parking. Heavy traffic reduces emergency response

times and diminishes neighborhood safety, which requires analysis under CEQA. There is not enough parking in the area to accommodate existing uses. The existing parking shortfall will likely increase as new developments take advantage of Metro D-line subway proximity and reduced parking requirements for transit-oriented development near the Wilshire/Fairfax Station. As it is, CBS has been known to rent parking spaces from the Grove.

Despite the fact that parking is a known, hot-button issue in the community, the DEIR fails to provide enough information for the community—and the decisionmakers—to evaluate whether Project parking will be sufficient. This is curious, given that providing adequate parking is an explicit Project Objective. (DEIR p. II-11.) The DEIR states that it would provide approximately 5,300 parking spaces, but it never actually commits to this number. (DEIR p. II-30.) The DEIR does not explain where the spaces would be, noting spaces “**may** be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully automated parking operations.” (*Ibid.*) Nor does the DEIR even commit to providing the spaces at any particular time, as “parking may be provided on-site incrementally to meet the needs of individual buildings and uses the spaces would serve, as appropriate and feasible.” (*Ibid.*) Finally, the DEIR does not even commit to providing the parking spaces **onsite**. Instead, “parking may be located anywhere within the Project Site **or off-site** upon the submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning. Furthermore, temporary off-site parking due to displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed.” (*Ibid.*)

Just as the DEIR fails to describe the uses planned for the site, it fails to explain how it will ensure that parking will be adequate. Members of the public and the City’s decisionmakers are expected to trust that the proponent will provide enough parking, that the parking will be useable and effective, and that the proponent will not decide to rely on offsite parking and shuttle services later. The DEIR also apparently assumes that if the Project provides shuttles to the subway, people will decide not to drive themselves. But 72% of Los Angeles-area commuters drive to work alone, regardless of the availability of transit. (See, <https://centerforjobs.org/ca/special-reports/california-commuters-continue-to-choose-single-occupant-vehicles>.) If the proponent chooses to rely on nearby offsite parking, as the Specific Plan seems to allow, the Project will actually **reduce** parking in the neighborhood and worsen the existing parking deficit and related traffic. The DEIR does not disclose or discuss this possibility, let alone provide mitigation.

That the Specific Plan will allegedly set forth a process for implementing a parking plan is no panacea, as the DEIR contains no details about this plan, what it will achieve, or how it will achieve those undisclosed goals. (DEIR p. II-30.) Even if this parking plan could

substitute for adequate disclosure and analysis, it would amount to impermissible deferred mitigation under CEQA.

Failure to provide sufficient parking will affect not only traffic and emergency response times but also land use if the Project does not comply with City of Los Angeles codes governing parking. The DEIR must be revised and recirculated to confirm that it will comply with all applicable regulations.

Response to Comment No. 11-24

Refer to Topical Response No. 13, Parking, for a discussion of the parking proposed for the Project which would be fully accommodated on-site, the adequacy of the proposed on-site parking supply, and that the Project no longer proposes any off-site parking. This has been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Nonetheless, the adequacy of a new development's parking supply is not a CEQA consideration. (Pub. Res. Code § 21099, subd. (b)(3) ["the adequacy of parking for a project shall not support a finding of significance pursuant to this section."].) Thus, the comments that the Draft EIR provides insufficient parking information and defers mitigation, and that the Project would reduce parking supply in the neighborhoods and worsen the existing parking deficit, are incorrect and do not raise valid CEQA concerns. There are no spaces at The Grove parking structure available to existing TVC employees. The Project would include sufficient parking to include the audience parking demand on site.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 26-122 regarding the five permitted uses that were disclosed and analyzed in the Draft EIR.

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35, 26-147, and 35-134 regarding emergency response times and how the Project would provide adequate emergency access.

Refer to pages IV.K-67 to IV.K-71 of Section IV.K, Transportation, of the Draft EIR for an analysis of the Project's consistency with the LAMC as it relates to transportation. As discussed therein, the Project would meet the applicable LAMC regulations.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

The statement at the end of the first paragraph in the comment may have been true at some time over the previous decades, but the current operation of Television City does not rent or lease parking spaces from The Grove or from The Original Farmers Market.

The third paragraph contains the statement that "72% of Los Angeles-area commuters drive to work alone, regardless of the availability of transit." While that statistic may be true on a regional basis, it is certainly not true for those employment areas in Los Angeles with convenient connections to rail transit. Downtown Los Angeles, for example, has fewer than 50 percent single-occupant vehicles commuting to work according to U.S. Census data from the American Community Survey (summarized at <https://map.mynighborhooddata.org/>). The Draft EIR conservatively assumes that only 15 percent of the employees to the Project Site will use transit, bike and walk modes to get to the Project Site. The provision of direct shuttles to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction could put the Project in a position to exceed that transit estimate.

Comment No. 11-25

E. The DEIR Fails to Analyze and Mitigate Impacts to Neighboring Properties Caused by Dewatering Required for Construction.

The DEIR further fails to disclose, analyze, and mitigate the impacts of the Project's massive excavations. "Construction would require an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill and up to 772,000 cubic yards of export." (DEIR p. II-1.) The DEIR provides, "Project excavations for below-grade parking would extend to a maximum depth of approximately 45 feet. As discussed in the Geotechnical Investigation, the historic high groundwater level on the Project Site is approximately eight feet bgs [below ground surface], which was conservatively assumed for analytical purposes." Thus, the Project will excavate 37 feet below the historic water level. Although the DEIR claims the opposite, excavation for developable subterranean space will require

large amounts of dewatering, amounts of dewatering sufficient to lower the water table beyond the borders of the Project site. (DEIR pp. I-19, IV.D-19, IV.D-24)

It is well established that the drying of previously wet soils can lead to the destabilization of buildings constructed on those soils. (See, e.g., <https://ctexaminer.com/2022/07/21/dewatering-undermining-the-lofts-apartments-has-a-long-history-in-stamford/>, <https://allamericanenviro.com/process-dewatering-construction-sites/>.) A Miami condominium project was recently halted when dewatering caused soil to sink at the property next door. (<https://www.local10.com/news/local/2021/11/17/city-plans-to-temporarily-pause-construction-of-miamis-deepest-underground-parking-garage/>.) Several experts also believe that the Surfside condominium tower collapse was caused, in part, by dewatering required to construct the neighboring condominium building. (<https://www.bizjournals.com/southflorida/news/2022/03/08/eighty-seven-park-stantec-sued-due-to-surfside.html> [“The complaint also alleged that the process of dewatering, removing groundwater and stormwater, during construction at Eighty Seven Park impacted the water table beneath Champlain Towers South, damaging its foundation.”])

However, since the DEIR assumes that only minimal and temporary dewatering will be required, the DEIR contains neither analysis nor mitigation, or even monitoring, of the potential impacts of years of dewatering. The DEIR fails to disclose, analyze, and mitigate these very real and concerning offsite geotechnical impacts, in violation of CEQA. The DEIR must be revised and recirculated to protect the safety of those working and residing near the Project site.

Response to Comment No. 11-25

As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment No. 11-5 regarding the Draft EIR’s comprehensive analysis of potential dewatering impacts and the Dewatering Report, which confirms the Draft EIR’s conclusion that impacts associated with dewatering would be less than significant.

Due to the depth of excavation below the water table, and as described in the Draft EIR, the Project would include excavation up to 45 feet below grade, and temporary dewatering during construction will be required. There are many temporary dewatering methodologies available, each of which is suited toward the individual capacities and experiences of the respective specialty contractors. Prior to construction commencement, a suitable specialty contractor is selected to perform a final evaluation of dewatering conditions. This study is far more detailed than the dewatering evaluation conducted for CEQA purposes and allows the selected specialty contractor to prepare a detailed dewatering method specific to the conditions of a particular building site. The specific method of dewatering is chosen after a project is approved during the regulatory building

permit process, considering the following variables, among others, depth of intrusion that is required for each building foundation, the hydraulic properties of the soils in which the excavations occur, the potential to mobilize any existing groundwater contaminants, the potential for ground subsidence and/or liquefaction to occur, proximity to any existing production wells, and the volume of water to be dewatered on a daily basis. After evaluating each of these factors individually and collectively, a dewatering strategy will be developed and implemented in a manner that will minimize any impacts to neighboring properties (i.e., settlement) and regional water resource needs. All dewatering methods will be designed and submitted to the Local jurisdiction, which includes the Los Angeles Department of Building and Safety (LADBS) Grading Division, LARWQCB and/or LASAN for review and approval, and will be performed, inspected, and monitored in compliance with all applicable regulatory requirements. Accordingly, temporary construction dewatering will be performed in a manner that will ensure less-than-significant impacts to neighboring properties and regional water resource needs. Refer to the Dewatering Report included as Appendix FEIR-13 of this Final EIR, which was prepared in response to comments for informational purposes and confirms the conclusion in the Draft EIR that impacts related to construction dewatering would be less than significant. The analysis also confirms that impacts related to subsidence from dewatering would be less than significant and would not damage neighboring properties; refer to Appendix D of the Dewatering Report.

Figures 8A and 8B of the Dewatering Report included in Appendix FEIR-13 of this Final EIR show the estimated dimensions of the cone of depression of lowered groundwater levels during the dewatering program for the Area 2 excavation. At the end of the simulated 21-month dewatering period, the analysis estimated drawdown¹⁰⁶ of approximately 10 feet, extending up to approximately 125 feet away from the Area 2 excavation perimeter and approximately 4 feet of drawdown at a distance of up to approximately 300 feet from the Area 2 excavation perimeter. As discussed in the Dewatering Report and for context, groundwater levels fluctuate naturally, and up to 6.5 feet of groundwater level fluctuation has been historically reported in the area. Also, the Dewatering Report analyzed the drawdown estimates and concludes the drawdown will be less than significant with respect to off-site soil stability.

As the dewatering will be limited to temporary dewatering during construction, and the proposed construction will eliminate the need for permanent dewatering, there will be no long-term impact on the water table in the vicinity of the Project due to dewatering. The

¹⁰⁶ In hydrologic terms, drawdown refers to the lowering of the surface elevation of a body of water, the water surface of a well, the water table, or the piezometric surface adjacent to the well, resulting from the withdrawal of water therefrom. Source: National Oceanic and Atmospheric Administration, National Weather Service Glossary, <https://w1.weather.gov/glossary/index.php?word=drawdown>, accessed November 7, 2023.

Project Site is situated within the Hollywood Subbasin and is designated for the following beneficial uses by the California Department of Water Resources and Los Angeles Regional Water Quality Control Board:¹⁰⁷ municipal, industrial, process, and agricultural. According to the Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (UWMP), the sub-basin is unadjudicated and is a low-priority basin not requiring a groundwater sustainability plan. The subbasin is reported to have a storage capacity of 200,000 acre-feet.¹⁰⁸ For the Area 2 excavation area, approximately 7.5 million gallons (23 acre-feet) of groundwater would be removed over the estimated 21-month temporary dewatering period, which is less than 0.05 percent of the basin capacity. The overall dewatering estimate of approximately 81 acre-feet is also less than 0.05 percent of the basin capacity. Following review of the State of California Groundwater Ambient Monitoring and Assessment Program (GAMA) groundwater well database, there are currently no supply (i.e., pumping) wells within 1 mile of the Project Site and thus the dewatering will not interfere with other active pumping.¹⁰⁹

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 for a detailed discussion regarding recirculation.

Comment No. 11-26

F. The DEIR Failed to Analyze Risks to Human Health, as Required by the Supreme Court in the *Friant Ranch* Decision.

The DEIR must also be revised and recirculated after the City completes a Friant Ranch-type analysis that connects identified Project emissions levels with human health impacts. This type of analysis is required by Supreme Court precedent, has been done in the past, and can be done here.

The most important analysis would study the impact of the Project's NOx emissions on ozone formation in the South Coast Air Basin, and the resulting cumulative impact of these air emissions on human health. In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, at 519-522 (“*Friant Ranch*”), the Supreme Court held that CEQA requires such an analysis

¹⁰⁷ LARWQCB, Water Quality Control Plan, Los Angeles Region, 1994.

¹⁰⁸ DWR, California's Groundwater Bulletin 118, Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin 4-11.02, 2003, updated 2004.

¹⁰⁹ California Water Boards, GAMA, Groundwater Information System, <https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/>, accessed October 10, 2023.

correlating increased project air emissions to the probable resulting human health effects. Specifically, the Court determined:

The EIR's discussion of health impacts of the named pollutants provides only a general description of symptoms that are associated with exposure to the ozone, particulate matter (PM), carbon monoxide (CO), and nitrogen dioxide (NO_x), and the discussion of health impacts regarding each type of pollutant is at most a few sentences of general information. The disclosures of the health effects related to PM, CO, and sulfur dioxide fail to indicate the concentrations at which such pollutants would trigger the identified symptoms. As in Bakersfield, "[a]fter reading the EIRs, the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin." (Bakersfield, supra, 124 Cal.App.4th at p. 1220, 22 Cal.Rptr.3d 203.) And as mentioned above, a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact. (See Cleveland National Forest, supra, 3 Cal.5th at pp. 514–515, 220 Cal.Rptr.3d 294, 397 P.3d 989.)

(*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519.)

No such analysis appears in the DEIR. A number of public agencies have performed a Friant Ranch-type analysis, demonstrating both that it is technically feasible and that it can produce useful information. A prime example of this application is the Sacramento Metropolitan Air Quality Management District (SMAQMD), which, in 2020, produced Guidance to Address The *Friant Ranch* Ruling For CEQA Projects in The Sac Metro Air District (SMAQMD Guidance), available at <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDFriantRanchFinalOct2020.pdf>; last visited 3/23/21. The SMAQMD Guidance states that, inter alia, it:

Provides insight on the health effects that may result from a project emitting at the maximum thresholds of significance (TOS) levels in the Five-Air-District Region for oxides of nitrogen (NO_x), volatile organic compounds (VOCs), and PM, in addition to levels of CO and oxides of sulfur (SO_x) calculated proportional to NO_x (as described in Section 4.1). This information can be used in environmental documents to provide a conservative estimate of the health effects of criteria pollutant emissions at the significance thresholds or below.

(SMAQMD Guidance, p. 2.)

SMAQMD performed photochemical grid modeling, looking at over 40 locations in its jurisdiction where new projects could be sited (based on General Plan classification and zoning, among other factors), estimated generic emissions from such new projects, and then calculated the amount by which ambient air concentrations of pollutants would change when those emissions were added to the mix.

The District then was able to run a health impacts model using those ambient concentrations predictions as inputs (SMAQMD used the Benefits Mapping and Analysis Program [BenMAP] used by U.S. EPA [SMAQMD Guidance, pp. 4–5]), enabling it to predict what health hazards could result, e.g., predicting rates of increases in asthma attacks based on increased ozone concentrations when a new project's NO_x or VOC emissions were added to the District's inventory, or increased incidences of myocardial infarctions when PM_{2.5} emissions rose. (SMAQMD Guidance, pp. 6–7.) Generic modeling was set up for new sources emitting at SMAQMD's significance threshold levels, and at higher levels. SMAQMD has made this modeling system available to the public, enabling a developer to choose a relevant location, input the emissions data for its own proposed project, and run the model, thereby getting reasonable estimates of health impacts for its particular project. (SMAQMD Guidance, Appendix F).

The City and the Project proponent could also arrange to run a comparable air quality and health effects modeling effort as California State University at Dominguez Hills (CSUDH) did for the EIR it performed on its recent Long Range Development Plan. We note that CSUDH is also located in Los Angeles County, like the Project. There is no reason CSUDH could do the appropriate analysis, but the present Project proponent cannot. The CSUDH EIR described its modeling in this way:

An analysis of the potential health effects of the project's criteria pollutant emissions was prepared by Ramboll US Corporation. (See EIR Appendix B.4, which contains detailed information regarding the methodology, input parameters, limitations and uncertainties associated with this analysis.) The analysis focuses on health effects attributable to ozone and particulate matter, as those are the criteria pollutants considered by the USEPA in its Benefits Mapping and Analysis Program (BenMAP), the analytical model it relies on and publicly distributes for use in estimating the health effects of air pollution. A photochemical grid model (CAMx) was used to estimate the incremental increase in ambient air quality concentrations as a result of project-related emissions.

(California State University Dominguez Hills Campus Master Plan EIR, p. 3.2-2, available at <https://www.csudh.edu/Assets/csudh-sites/fpcm/docs/campus-master-plan/2019-09-11-FEIR.pdf>; last visited 3/23/21.)

Comparison to the CSUDH EIR is appropriate because of its geographic proximity in the South Coast Air Basin and recent preparation. In preparing the Final EIR for its campus master plan, CSUDH was prompted by a comment letter that complained of the lack of an analysis responding to the *Friant Ranch* opinion to hire an additional air quality consultant (Ramboll) to perform computerized modeling of the master plan's expected air pollutant emissions over the entire South Coast Air Basin, and to identify health impacts that might be caused by these emissions.

To create a worst-case analysis, the VOC emissions from the year of project construction with the highest VOC use (principally from architectural coatings) were added to the full build-out operational emissions of all other criteria pollutants from both stationary and mobile (vehicle) sources. (CSUDH FEIR, Appendix B4, p. 4.) Annual emissions were distributed in a grid model used by the SCAQMD to represent the South Coast Air Basin, appropriately allocated over time, and the model estimated the change in concentrations of ozone and PM_{2.5} that would result from the addition of the master plan's emissions. (*Id.*) Those results were then evaluated using BenMAP, a health-effects prediction model used by USEPA in its evaluation of the health impacts of potential air pollution control strategies. The Final EIR reported the results of the modeling for ozone and PM_{2.5}, because those are the pollutants for which USEPA generally uses BenMAP, and because those pollutants have the most serious health impacts. (*Id.*, p. 2.)¹

The CSUDH's Final EIR reported the results of the analysis at FEIR, p. RTC-31:

Based on the Ramboll analysis, PM_{2.5}-related health effects attributed to the project include asthma-related emergency room visits (4.38 incidences per year), asthma-related hospital admissions (0.38 incidences per year), cardiovascular-related hospital admissions (excepting myocardial infarctions) (1.05 incidences per year), respiratory-related hospital admissions (2.44 incidences per year), mortality (10.31 incidences per year), and nonacute myocardial infarctions (less than 0.53 incidences per year). Ozone-related health effects attributed to the project include respiratory-related hospital admissions (0.67 incidences per year), mortality (0.28 incidences per year), and asthma-related emergency room visits (lower than 3.38 incidences per year.)

The CSUDH FEIR characterized these results as conservatively estimated, but acknowledged "regulatory agencies, including the USEPA, have judged that, even so, the results supply sufficient information to the public to allow them to understand the health effects of increases or decreases in air pollution." (*Id.*)

As described above, multiple examples demonstrate that a *Friant Ranch* analysis can be done. It is both appropriate and necessary to do such an analysis here.

¹ This process is very similar to the use of CAMx and BenMAP by SMAQMD. See also 2020 Mineta San Jose International Airport Master Plan Amendment Integrated EIR, Supplemental Air Quality Analysis, at Introduction, p. 2, available at <https://www.sanjoseca.gov/Home/ShowDocument?id=61650>; last visited 3/23/21.

Response to Comment No. 11-26

This comment cites two examples of a quantitative assessment of regional pollutant emissions and human health. The first example refers to guidance prepared by SMAQMD for use over a five-air-district region at 40 generic development sites, whereby a project could extrapolate results from this basin-wide modeling exercise using site specific emissions. The usefulness of this approach on a project-specific basis would likely not provide reliable information regarding a measurable increase in concentrations sufficient to accurately quantify potential health impacts. Any modeled increase in concentrations would not be useful for meaningful analysis, as the increase would be so comparatively small that it would be well within the error margins of such models. Regardless, the SMAQMD guidance is specific to the region analyzed (different meteorological data and background pollutant emissions and concentrations), and SCAQMD has not taken on such a program for individual projects. Notably, the SCAQMD in its comment letter did not make any such comment.

The second example cited in this comment is the California State University Dominguez Hills Campus Master Plan EIR in which a study was performed by a private consultant for a specific project and not at the direction or specific guidance from SCAQMD. That consultant used BenMAP, which is a model used for assessing impacts over large areas and populations and is not intended to be used for individual projects, as it would not provide meaningful or reliable results at the smaller scale.¹¹⁰ Again, that consultant then used CAMx which is designed to model emissions on a regional, statewide, and national scale and is, therefore, unsuitable for a project-level analysis. In addition, these models require inputs, such as regional sources of pollutants and global meteorological data, which are generally not accessible for individual project level analyses. In addition to the unsuitability of regional models in providing reliable results for local-level plans or individual projects, other general limitations of the models include limitations on the ability of certain tools to model concentrations or the dispersion of pollutants for all types of sources, addressing a partial and incomplete range of pollutants and secondary pollutants, and limitations on being able to correlate identified concentrations to related health effects.

Pages IV.A-80 to IV.A-82 in Section IV.A, Air Quality, of the Draft EIR provide a discussion of the connection between significant regional pollutant emissions and human

¹¹⁰ City of Los Angeles, Department of City Planning, Air Quality and Health Effects, October 2019, p. 13.

health effects. As discussed therein, the City has provided guidance documenting the public health consequences resulting from exposure to pollutants. The guidance document also explains that direct correlation of an individual project's emissions and health effects is not feasible, as no expert agency has approved a quantitative method to identify health effects for the scale of projects typically analyzed in City EIRs.¹¹¹

In the case of the Project, the regional construction emissions would exceed SCAQMD's recommended daily significance thresholds for NO_x.¹¹² However, this does not mean that a concentration of O₃ would be created at or near the Project Site on a particular day or month of the year or that any specific human health impacts may occur from such an exceedance. As discussed in the City's guidance document, meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentrations and locations of O₃. In addition, it would not be feasible to model with any degree of reliability or certainty the impact on attainment of the ambient air quality standards that these Project emissions which exceed regional thresholds may have. The currently available tools are equipped to model the impact of all emission sources in an air basin in attainment but lack the resolution to reliably model O₃ concentrations from smaller sources of O₃ precursors, such as individual projects. Therefore, O₃ modeling for individual projects would not be feasible or provide meaningful data to assess health impacts.

From a scientific standpoint, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O₃ levels over an entire region. SCAQMD's 2012 AQMP showed that reducing baseline year 2008 NO_x by 432 tons per day and reducing VOC by 187 tons per day would only reduce O₃ levels at SCAQMD's monitoring site with the highest levels by only 9 parts per billion (ppb). This is a relatively immaterial change in local O₃ concentrations for a large decrease in regional O₃ precursors (NO_x and VOCs).¹¹³ SCAQMD also conducted pollutant modeling for proposed Rule 1315 in which the CEQA analysis accounted for essentially all of the increases in emissions due to new or modified sources in the SCAQMD between 2010 and 2030, or approximately 6,620 pounds per day of NO_x and 89,947 pounds per day of VOC. The results of the analysis showed that this increase of regional pollutant emissions would contribute to a small increase in the Air Basin-wide O₃ concentrations in 2030 by 2.6 ppb and less than one ppb of NO₂. Again, this is a relatively immaterial increase in O₃ concentrations despite the expected very large increase in regional O₃ precursors.

¹¹¹ City of Los Angeles, Department of City Planning, Air Quality and Health Effects, October 2019.

¹¹² Under a long-term buildout scenario, concurrent construction and operational emissions would exceed SCAQMD's recommended daily significance thresholds for NO_x and VOC.

¹¹³ SCAQMD, Final 2012 AQMP, February 2013, Appendix V: Modelling & Attainment Demonstrations, pp. v-4-2, v-7-4, v-7-24.

Based on information provided in the City's guidance document, the Project would fall within the scope of a "typical City project" since the estimated maximum daily construction regional NO_x emissions of 105 pounds per day over SCAQMD's significance threshold represent approximately 1.5 percent of the emissions analyzed by SCAQMD related to Rule 1315.¹¹⁴ Running the regional-scale photochemical grid model used for predicting O₃ attainment with the emissions from the Project (which equates to approximately 0.4 of 1 percent of the VOC and NO_x in the air basin) would not yield reliable information regarding a measurable increase in O₃ concentrations sufficient to accurately quantify the Project's O₃-related health impacts. Any modeled increase in O₃ concentrations would not be useful for meaningful analysis as the increase would be so comparatively small that it would be well within the error margins of such models. Based on this information, a general description of the adverse health impacts resulting from the pollutants at issue is all that can be feasibly provided at this time. Please see Appendix B of the City's guidance document for a discussion of general adverse health impacts resulting from NO_x.

In response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 11-27

G. Project Design Features Must Be Incorporated Into the Mitigation Monitoring and Reporting Plan.

The DEIR contains project design features (PDFs) that are used to justify the DEIR's claims that the Project will not have significant and adverse environmental impacts. While the DEIR claims that these PDFs are part of the Project itself, "A mitigation measure is not part of the project." (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 433.) An EIR cannot incorporate "the proposed mitigation measures into its description of the project and then conclude [] that any potential impacts from the project will be less than significant." (*Lotus*, 223 Cal.App.4th 645, 655-657.)

Instead, these PDFs appear to be no more than mitigation measures by another name. Mitigation measures must be "fully enforceable through permit conditions, agreements, or

¹¹⁴ Under a long-term buildout scenario, concurrent construction (mitigated) and operational regional emissions (approximately 63 pounds of NO_x and approximately 16 pounds of VOC per day) over SCAQMD's significance threshold would represent approximately 0.9 percent of NO_x emissions and approximately 0.02 percent of VOC emissions analyzed by SCAQMD related to Rule 1315.

other measures.” (Pub. Resources Code § 21081.6(b).) “The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.” (*Federation of Hillside & Canyon v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261; *Katzeff v. California Dept. of Forestry and Fire Protection* (2010) 181 Cal.App.4th 601, 612; *Lincoln Place Tenants Assn v. City of Los Angeles* (2005) 130 Cal.App.4th 1491.)

In addition, the DEIR’s reliance on the PDFs as part of the project appears to be an attempt to skirt CEQA’s requirement to disclose a Project’s potential impacts before mitigating them. Agencies cannot use project design features to avoid publicly evaluating alternatives and mitigation measures during the CEQA process. Doing so “precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences.” (*Lotus, supra*, 223 Cal.App. 4th 645.) This analytical shortcut is “not merely a harmless procedural failing...[it] subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation.” (*Id.* at 658.)

The DEIR must incorporate these PDFs, as proper mitigation measures, into the Mitigation Monitoring and Reporting Plan (MMRP). The DEIR must then analyze the impacts of both including, and of not including, these measures in the Project. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 [EIR must evaluate efficacy of proposed mitigation measures]; CEQA Guidelines § 15126.4 [EIR must evaluate any significant impacts caused by proposed mitigation measures].) Recirculation must occur.

Response to Comment No. 11-27

Refer to Response to Comment No. 9-34. As discussed therein, the proposed PDFs are not mitigation measures, and the proposed PDFs are included in Section IV, Mitigation Monitoring Program, of this Final EIR, along with details about the enforcement and monitoring agencies, timing, and action indicating compliance. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-28

Finally, as discussed above, the DEIR fails to include a defined project description sufficient to enable useful environmental review or the formulation of mitigation measures. The DEIR must be recirculated after the development of a project ripe for review, along with concrete and useful mitigation measures that address the potentially significant environmental impacts of implementing that ripe project.

Response to Comment No. 11-28

As demonstrated in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, Section II, Project Description, of the Draft EIR has been completed in full compliance with CEQA. Furthermore, feasible mitigation measures have been included throughout the Draft EIR to reduce the potential impacts associated with the Project as required by CEQA.

With regard to recirculation, this comment letter does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-29

II. The Regional Center General Plan Designation is Inappropriate for the Site, and the City’s Proposed Amendment of the General Plan for this Project is Impermissible Spot-Zoning.

The Project includes a General Plan amendment that would change the site’s General Plan designation from Community Commercial, Limited Commercial, and Neighborhood Commercial to Regional Center Commercial. (DEIR p. II-36.) The Project would also designate unincorporated land as part of the Regional Center for annexation into the City. (*Ibid.*) The Project proponent claims in marketing materials that this designation matches the site’s existing use and function. (DEIR p. IV.H-44.) In reality, once the Project site becomes designated as a Regional Commercial Center, it will be treated not as the community and neighborhood commercial currently present, but as a regional draw along the lines of Century City. Given that proposed height maximums for the Project reach 225 feet, an eventual transition to a more Century City–like high-rise development is hardly far-fetched.

The City’s General Plan Framework Element designates Regional Centers at Figure 3-1. (See, <https://planning.lacity.org/cwd/framwk/chapters/03/F31MtoMp.pdf>.) The Framework Element defines Regional Centers as:

A focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Generally, different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional

Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.

(General Plan Framework, Long Range Land Use Diagram, Fig. 3-1.) Notably, the City provides that Regional Centers are “generally...6- to 20-stories (or higher)” with floor area ratios of up to 6.0:1. The Framework Element, which provides for future growth in the City based on the adequacy of supporting infrastructure, notably does not provide for a Regional Center along Beverly or Fairfax. (See, <https://planning.lacity.org/cwd/framwk/chapters/03/F31MtoMp.pdf>.)

This General Plan Amendment represents a major change to the identity of the area, and to its future growth potential, that should occur in the context of comprehensive planning, such as an update of the Wilshire Community Plan. The Wilshire Community Plan was last updated in 2001 and is due for a comprehensive update. A change of this magnitude must occur with the expertise of the planning department and proceed through the normal public process. It should not happen through spot-zoning for a single developer. Successful land use planning is comprehensive and cohesive. “Case-by-case reconsideration of regional land-use policies, in the context of a project-specific EIR, is the very antithesis of that goal.” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 572–573.)

Furthermore, once an area is designated as a Regional Center in the General Plan, impacts cascade into the surrounding area. Increased development intensities spread out from the designation, as has been seen at Century City and the Beverly Center. If the City chooses to stay this course and amend the entire General Plan for a single, undefined development, the DEIR must be updated to provide a full and accurate assessment of induced growth that is not currently present.

Response to Comment No. 11-29

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation. As set forth in Section II, Project Description, of the Draft EIR, and evaluated in Section IV.H, Land Use and Planning, of the Draft EIR, the Project is requesting a General Plan Amendment to change the various existing land use designations for the Project Site to a unified Regional Commercial designation and to assign a Regional Commercial designation to an approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County to be annexed to the City of Los Angeles. As identified in this comment, per the General Plan Framework Element, “Regional Commercial” land uses “contain a diversity of uses such as offices, retail [and] major entertainment facilities and supporting services,” which “typically provide a significant number of jobs” and are “intended to serve as the focal points of regional commerce, identity, and activity.” TVC’s function has been consistent with the Regional Commercial land use designation for over 70 years as the first purpose-built television studio and an

icon for the entertainment industry, as well as a major source of jobs and a major component of the Beverly-Fairfax community's identity. As such, the proposed Regional Commercial land use designation is appropriate for the continued operation of the Project Site as a studio. Furthermore, as discussed in Response to Comment No. 5-8, the Regional Commercial designation does not allow upzoning at the Project Site and would not, in and of itself, result in a major change in the identity of the community. As such, the total amount of floor area requested could be granted regardless of whether the land use designation is modified to "Regional Commercial" or the existing Community Commercial, Limited Commercial, or Neighborhood Commercial designations are retained.

Furthermore, the lack of a Regional Commercial designation by the Framework Element does not mean that the Project Site would not have adequate infrastructure to support the Project. Rather, as demonstrated in the analysis of utilities included in Section IV.M, Utilities and Service Systems, of the Draft EIR, adequate utilities infrastructure would be available to accommodate the Project, and impacts would be less than significant.

Although not related to any specific CEQA analysis performed in the Draft EIR, the comment also raises spot zoning and incorrectly asserts that the Project is impermissible spot zoning. The court, in *Foothill Communities Coalition v. County of Orange* (2014) 222 Cal.App.4th 1302, clarified the two-step analysis for purported "spot zoning." First, the court must determine if a "small parcel of land is subject to more or less restrictive zoning than surrounding properties." (Id. at 1311-12.) Courts recognize that "the essence of spot zoning is irrational discrimination" and that spot zoning usually "involves a small parcel of land." Therefore, "the larger the property the more difficult it is to sustain an allegation of spot zoning." (Id. at 1311.) Second, even if this Project was an example of spot zoning, courts must next determine if the zoning should be nonetheless upheld "where rational reason in the public benefit exists for such a classification." (Id. at 1311.) Spot zoning may be justified if a substantial public need exists "even if the private owner of the tract will also benefit." (Id. at 1314.)

To restate the above, spot zoning involves applying a zoning designation and/or other land use regulations to a single/small parcel of land that are substantially different from those applicable to other parcels in the vicinity. The Project Site is already designated as three separate General Plan land use designations, one of which, the Limited Commercial designation that is applicable to an approximately 5.7-acre portion of the Project Site, is shared with no other properties in the vicinity. Contrary to the commenter's allegations, the General Plan Amendment to the Regional Commercial designation would represent a consolidation of three land use designations and eliminate the current patchwork of designations applicable to the Project Site.

The Project and its associated land use approvals are proceeding through the City's standard review and approval processes and in accordance with public review

requirements required by the City and CEQA. As discussed in Topical Response No. 6, Wilshire Community Plan Update, statutory law contains no requirement that a general plan's land use element—which is the City's Wilshire Community Plan—be updated at any given interval or in connection with any given event (such as the approval of a new development project). Further, unlike certain General Plan elements, such as the Housing Element, State law does not require that local jurisdictions regularly update their land use element within certain time frames. With regard to induced growth, as discussed above, the total amount of floor area requested could be granted regardless of whether the land use designation is modified to "Regional Commercial." As such, the change in the land use designation to Regional Commercial would not, in and of itself, result in induced growth. Refer to pages VI-14 through VI-17 of Section VI, Other CEQA Considerations, of the Draft EIR for a discussion of growth inducement associated with the Project that concludes that direct and indirect growth inducing impacts of the Project would be less than significant.

Finally, the requested General Plan Amendment for the Project is not inconsistent with the court's holding in *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553. The plaintiff in *Goleta* sought to use the alternative analysis in the EIR to reconsider various regional land use plans. The court rejected that argument, stating that in an EIR alternatives analysis, no single project needs to reevaluate the comprehensive land use goals of the region. Instead, an individual development project may seek an amendment to a local land use plan so long as the lead agency evaluates the consistency of the proposed project with the applicable policies, objectives and goals in the existing land use plans. The Draft EIR provided that analysis. Refer to Section IV.H, Land Use and Planning, and Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR.

Comment No. 11-30

III. The Project Fails to Satisfy Sign District Requirements.

As discussed in the comment letter submitted by Save Beverly Fairfax on August 25, 2022, the Project fails to meet City requirements for a Sign District. Los Angeles Municipal Code section 13.11, subdivision (C) provides that the development regulations for signage within a Sign District must be determined at the time the Sign District is established. As a draft ordinance has not yet been proposed or provided to the public, any discussion of a Sign District is premature. Moreover, as the DEIR purports to analyze the impacts of this as-yet-undisclosed Sign District, the DEIR must be revised and recirculated once the Preliminary Draft Specific Plan ordinance becomes publicly available. The DEIR cannot adequately disclose, analyze, and mitigate the impacts of portions of the Project that remain unformed and undisclosed.

Response to Comment No. 11-30

Refer to Response to Comment Nos. 9-25 and 9-26 regarding how the Sign District application was submitted in accordance with LAMC requirements and the timing of the development regulations for a sign district. Also refer to Response to Comment No. 5-10 regarding how the components of the Preliminary Draft Specific Plan were adequately described in the Draft EIR and the availability of the Preliminary Draft Specific Plan for public review, which is not required by CEQA. LAMC Section 13.11 C states that “[t]he development regulations for each “SN” Sign District shall be determined at the time the district is established.” Contrary to the commenter’s incorrect assumption, the Sign District would not be established until after the Final EIR is completed; therefore, environmental review is not premature. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 11-31**Conclusion**

The TVC 2050 Specific Plan is not a defined “project” for purposes of CEQA. As currently written, the document hinders CEQA’s purposes of providing informed decision making and informed public review. Currently, neither the decision makers nor the public know what exactly the Specific Plan is meant to achieve or the environmental consequences of project approval. If the City’s goal is to ensure continued television production in Los Angeles, and not just the development of 1.6 million square feet of new retail, the Specific Plan’s land use restrictions should reflect that priority. Once the proponent has settled on an actual plan, the City must perform the studies and analysis needed to adequately disclose, analyze, and mitigate the Project’s likely environmental impacts in a revised DEIR. This DEIR must be recirculated for meaningful public comment which has, up to this point, been denied. The City’s failure to take these important steps would result in an EIR vulnerable to legal challenge.

The Association looks forward to revision of the DEIR and the Specific Plan and to continued participation in the City’s process regarding this important Project.

Response to Comment No. 11-31

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the fact that a draft Specific Plan

was not required to be included as part of the Draft EIR and how the physical aspects of the proposed Specific Plan are fully accounted for in Section II, Project Description, of the Draft EIR, and in the associated impact analyses throughout the Draft EIR. Refer to Response to Comment No. 11-10 regarding the maximum limit of retail floor area under the proposed Specific Plan.

This comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 12

Jessica Lall
President & CEO
Central City Association of Los Angeles
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Los Angeles, CA 90017-2938

Comment No. 12-1

Established in 1924, Central City Association (CCA) is committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase opportunity in the region. **We are pleased to support the Television City 2050 (TVC 2050) specific plan that will help retain and attract good-paying jobs in the creative industries that can bolster our citywide economic recovery.**

Hackman Capital Partners is committed to keeping creative industries in Los Angeles and meeting the high ongoing needs for state-of-the-art production stages. This is especially important as the city works to recover from the pandemic's deep economic impacts. With the necessary proposed updates, the media campus will deliver significant economic and community benefits to the city and region. The project will deliver more than \$2 billion in economic output during construction and \$2.4 billion in total annual economic output once operational.

Further, Hackman has demonstrated its ongoing commitment to the community by bringing on numerous community partners, helping local businesses and providing mentorship and job training opportunities in the media industry. The TVC 2050 plan also includes innovative community-serving features including improved landscaping and first/last mile infrastructure and other public realm improvements.

For all these reasons, we hope you will support this specific plan and thank you for your consideration.

Response to Comment No. 12-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 13

Tom Williams
President
Citizens Coalition for a Safe Community
4117 Barrett Rd.
Los Angeles, CA 90032-1712

Comment No. 13-1

The Specific Plan (SP) DEIR is totally inadequate and incomplete with regard to being a Project Specific EIR rather than a Programmatic EIR.

Response to Comment No. 13-1

Refer to Response to Comment No. 20-2 regarding a Project EIR versus a Program EIR. This comment provides no substantial evidence to support the statement that a Programmatic EIR is necessary but is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 13-2

The Historical, Cultural, Paleontological, and Hydrological Resources are totally excluded, although they are considered on site and potentially significant and without mitigation, they will be significantly environmental impacted.

Response to Comment No. 13-2

Historical and cultural resources are fully addressed in Section IV.B, Cultural Resources, of the Draft EIR. Hydrology is fully addressed in Section IV.G, Hydrology and Water Quality, of the Draft EIR. In addition, paleontological resources are fully addressed in Section IV.D, Geology and Soils, of the Draft EIR.

Comment No. 13-3

Mineral Resources section is excluded, although oil and gases are discussed under Hazards and Hazardous Materials.

Response to Comment No. 13-3

An analysis of potential impacts associated with mineral resources was included in the Initial Study prepared for the Project included as Appendix A to the Draft EIR. As

demonstrated therein, potential impacts associated with mineral resources were determined to be less than significant.

Comment No. 13-4

The Program site subsurface soils must be considered oil and gas contaminated and must be exposed, graded, excavated, and bored through according to a well-documented site investigation and strictly-enforced procedures for construction and long-term occupancy and ventilation/treatment facility/system which have not been provided in the current EIR.

Response to Comment No. 13-4

The nature and extent of both naturally occurring and anthropogenic petroleum hydrocarbons in soil and groundwater at the Project Site have been investigated and reported in the Site Summary Report (Appendix G.1 of the Draft EIR), and various monitoring reports for the former Texaco station located at the northeast corner of the Project Site. As discussed in the Site Summary Report (Appendix G.1 of the Draft EIR) and discussed further in the response below, residual petroleum hydrocarbons detected in soil samples are mostly below regulatory screening levels, and the limited, residual petroleum screening level exceedances in soil appear to be sporadic and confined to shallow soil. Residual petroleum hydrocarbons in soil associated with the former Texaco station remain at a limited area of the northeast corner of the Project Site, consistent with the approval of the remediation by the LARWQCB. Per Mitigation Measure HAZ-MM-1, the testing and proper disposal of all excavated soil for the Project Site, including any soils impacted by releases from the former Texaco station, will follow the procedures described in the Soil Management Plan (Appendix B of the Site Summary Report).

With respect to naturally occurring oil and tar, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project Site is located within the Salt Lake Oil Fields and the La Brea Oil Field, and the Project Site is located approximately 0.6 mile north of the La Brea Tar Pits (Draft EIR pages IV.F-22 and IV.F-30). As discussed on page 4 of the Site Summary Report and page IV.F-22 of the Draft EIR, historical research, such as topographic maps, aerial photographs and records from the State of California Geologic Energy Management Division (CalGEM) well finder database, confirm that no oil or gas production wells or oil derricks were located on the Project Site. Following extensive subsurface investigations and sampling, naturally-occurring tar was noted only in an isolated area near the southwest boundary of the Project Site where a tar collection system is located. (Draft EIR page IV.F-30; see also pages 35 to 36 of the Phase I ESA dated November 20, 2017, included in Appendix G of the Draft EIR). As stated on page IV.F-30 of the Draft EIR, surface fittings associated with a subsurface tar removal system were observed near the southwestern corner of the Project Site; see Figure IV.F-1 on page IV.F-26 of the Draft EIR (and revised Figure IV.F-1 in Section III, Revisions,

Clarifications, and Corrections to the Draft EIR). The tar collection system is serviced on a regular basis by Worldwide Recovery Systems, Inc., and the accumulated tar is collected in 55-gallon drums for proper off-site disposal or recycling. No evidence of related environmental concerns was identified in association with the tar collection system. According to the Phase I ESA, the tar collection system does not appear to represent a significant environmental concern so long as it continues to be maintained and operated in accordance with all applicable industry standards and/or regulatory requirements. Testing and proper disposal of any excavated soil impacted by naturally occurring oil and/or tar will follow the sampling, testing, and disposal procedures described in Section 5 of the Soil Management Plan (Appendix B of the Site Summary Report).

Limited residual petroleum hydrocarbons in soil associated with the former Texaco station located in the northeast portion of the Project Site would remain on-site, as discussed on page 12 of the Site Summary Report. The investigation and remediation of soils impacted by the release from the former Texaco station was approved by the LARWQCB; these efforts were discussed extensively in the documents referenced above. In addition, as discussed in the Site Summary Report, several other instances of petroleum use (second former gasoline station (the Anderson V L, a retail gasoline station) and removed diesel underground storage tanks [USTs]) were investigated and no residual petroleum contamination was identified with the historical uses. The testing and proper disposal of any excavated soil for the Project Site will follow the sampling, testing and disposal procedures described in the Soil Management Plan. As stated on page IV.F-57 of the Draft EIR, based on the analysis in the Site Summary Report, regulatory compliance and appropriate mitigation—specifically, the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1 (see pages IV.F-50 to IV.F-53 of the Draft EIR)—would address any residual constituents associated with the former Texaco station release that might be encountered during construction, and impacts would be reduced to a less-than-significant level. With appropriate protocols and management of impacted soil per Mitigation Measure HAZ-MM-1, as well as related Mitigation Measure HAZ-MM-2 (see pages IV.F-53 to IV.F-54 of the Draft EIR), designed to mitigate the effects of subsurface gases and impacted soil and groundwater on workers and the public, the Project would not create a significant hazard to the public or the environment or exacerbate existing environmental conditions.

Thus, with regard to potential soil contamination, any residual concentrations would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1. Specific areas with total petroleum hydrocarbon (TPH) impacts and one location with elevated arsenic also would require appropriate management during excavation and grading operations (refer to Figure 2 of the Site Summary Report). Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control.

While this comment focused on potential petroleum impacts to soil, it should be noted that any contaminated groundwater (due to petroleum impacts to soil) that is discharged during the temporary construction dewatering will follow the testing, on-site treatment (if necessary), and off-site discharge requirements contained in the approved discharge permit (either an NPDES permit or an industrial sewer discharge permit). Refer to Response to Comment No. 11-5 for additional information regarding compliance with discharge permits.

Comment No. 13-5

A total review/revision/recirculation of the current “Specific Plan” Draft Environmental Impact Report must be conducted, and recirculation must involve a “Programmatic Draft Environmental Impact Report” with suitable, enforceable Program scope/schedule/participation Program for periodic and project specific reviews consistent with the Specific Plan Program Mitigation, Monitoring, and REPORTING plan.

Response to Comment No. 13-5

Refer to Response to Comment No. 20-2. This comment provides no substantial evidence to support the statement that a Programmatic EIR is necessary but is noted for the record and will be forwarded to the decision-makers for review and consideration. It is unclear as to what the comment regarding “enforceable Program scope/schedule/participation Program for periodic and project specific reviews” is referring to. However, Section IV of this Final EIR includes a Mitigation Monitoring Program in compliance with City and CEQA requirements. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 13-6

Methane gases have been reported along the old Metro rail tunnel alignments on Wilshire and north along Fairfax. They were responsible for the Ross-Store, 3rd & Ogden explosion in 1985 and the later gas without explosion incursions north of 3rd Street, 1300ft [sic] south of Project. The Program site must be considered as gassy and a project-by-project schedule of surveys, monitoring, and remediation must be provided along with an overall Program remediation plan, which is currently absent. Review of historic documents, an overall drilling/sampling/monitoring/degassing program, and a project-by-project ventilation/protection program must be incorporated in a revised Program-DEIR.

As part of the Mineral Resources and Hazardous Materials review and revision, the preparers must identify all subsurface property/oil/mineral rights owners and any abandoned/idled near-surface wells which may endanger the surface owners and residents. As well documented for underground fuel tanks, owners of properties which

have had operators or lessees which contaminated soils/environment remain liable for damages and restoration of surface properties from operations of lessees.

Specific Plan CEQA requires a formal procedure and set of environmental sectors for environmental considerations in a mini-EIR for each project proposed during the duration of the Specific Plan and Programmatic EIR. As commonly required by the Department of City Planning, a formal hazardous materials review must be implemented for the SP Site and then made specific for each project (DCP commonly includes such reports prepared by EDRNet and using LightBox resources, including historic 1920–1940 aerial photos of the Fairfax areas, showing oil well derricks.

Historic resources have been found throughout the surface oil field and additional resources must be expected beneath the SP site, and appropriate survey and monitoring plans must be incorporated and implemented/enforced throughout the life of the SP Project.

Response to Comment No. 13-6

Phase I and Phase II investigations, which are included in Appendix G of the Draft EIR and documented in the Site Summary Report (Appendix G.1 of the Draft EIR), among others, have been performed to evaluate Project Site environmental conditions pertaining to the nature and extent of impacts to soil, soil vapor, and groundwater, including the potential presence of naturally-occurring methane.

As discussed in Response to Comment No. 13-4, despite the Project Site's location within the Salt Lake Oil Fields and La Brea Oil Field and the historic operation of oil wells in the surrounding area, no former oil or gas production wells or oil derricks have been identified within the Project Site. Former oil wells identified as "plugged" or "idle" were located in the developed area, ranging approximately 100 to 200 feet from the Project Site (California Department of Conservation CalGEM Well Finder [Well Star] website). Accordingly, the Draft EIR concluded that the Project would not exacerbate the risk of upset and accident conditions associated with oil wells, and impacts associated with oil wells would be less than significant (see page IV.F-46 of the Draft EIR).

As discussed on pages IV.F-33 to IV.F-34 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project Site is located within a designated methane zone mapped by the City of Los Angeles, and a subsurface investigation conducted in 2018 identified elevated methane concentrations in soil vapor at the Project Site (i.e., methane was detected in 5 out of 26 sampling locations with concentrations ranging from

0.2 percent volume to 90.7 percent volume). Sites nearby are also known to be impacted by naturally occurring methane, and a Limited Phase II Investigation revealed concentrations of naturally occurring methane in soils at the Project Site.¹¹⁵ Naturally occurring hydrogen sulfide was not detected in any of the 26 soil vapor samples. Existing operations on-site include a methane alarm, mitigation, and venting system. In addition, Global Realty Services (GRS) Group, who prepared the Phase I Environmental Site Assessment (Phase I ESA; included in Appendix G of the Draft EIR), observed several methane gas vent pipes associated with a methane gas mitigation system protruding from the ground at various exterior locations throughout the Project Site. According to the Phase I ESA, the methane gas mitigation system does not appear to represent a significant environmental concern so long as it continues to be maintained and operated in accordance with all applicable industry standards and/or regulatory requirements.

As stated above, soil vapor sampling across the Project Site identified the presence of methane and naturally-occurring hydrogen sulfide, which is associated with oil deposits in the vicinity. As described on page IV.F-43 of the Draft EIR, with the Project, methane mitigation systems would be designed in accordance with the latest regulatory control measures, including Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code (Methane Code), LAMC 91.7107 and the City of Los Angeles Methane Hazard Mitigation Standards, as required by LADBS. Based on the results of the investigations performed, and as described in the Site Summary Report and page IV.F-43 of the Draft EIR, and in compliance with the Methane Code, a Site Design Level V methane system will be proposed for any new construction at the Project Site. Furthermore, for existing buildings located within a methane zone, additions, alterations, repairs, changes of use, or changes of occupancy must comply with the methane mitigation requirements of LAMC Sections 91.7104.1 and 91.7104.2, when required by LAMC Chapter IX, Article 1, Divisions 81 or 82. Methane systems would be designed in accordance with the latest regulatory control measures, including the City of Los Angeles Methane Hazard Mitigation Standard Plans, as required by LADBS. Accordingly, the Project's methane controls would include an impervious membrane, ventilation systems capable of providing a complete change of air, an indoor methane detection and alarm system, and development and implementation throughout the life of the Project of an operations, monitoring and maintenance plan, as well as an emergency/contingency plan for the methane mitigation system. Installation of a methane mitigation system will have the added benefit of addressing potential vapor intrusion from residual fuel hydrocarbons from the former Texaco station, and naturally occurring hydrogen sulfide.

¹¹⁵ Geosyntec Consultants, Limited Phase II Site Investigation Report, 7800 West Beverly Boulevard, Los Angeles, CA, November 7, 2018; refer to the Site Summary Report (Appendix G.1 of the Draft EIR) for discussion.

Regarding methane explosions, as stated on page IV.F-33 of the Draft EIR, in high concentrations of between 50,000 and 150,000 parts per million (ppm) by volume in the presence of oxygen, methane can be an explosion hazard. During the Limited Phase II investigations of the Project Site, methane was detected at concentrations up to 90.7 percent of the lower explosion limit. As discussed on page IV.F-55 of the Draft EIR, Mitigation Measure HAZ-MM-2 (included on pages IV.F-53 to IV.F-54 of the Draft EIR) requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public, including potential explosion hazards. These measures would include monitoring devices for methane and benzene to alert workers of elevated gas concentrations, contingency procedures if elevated gas concentrations are detected, and worker training to identify exposure symptoms and implement alarm response actions. Furthermore, fencing would be erected to limit public access and allow for gas dilution. Lastly, a Health and Safety Plan (HASP) would be prepared to describe the proposed construction activities and hazards associated with each activity. As such, implementation of Mitigation Measure HAZ-MM-2 would ensure potential impacts related to methane would be less than significant.

As discussed in the Site Summary Report, residual petroleum hydrocarbons in soil associated with the former Texaco station remain at a limited area of the northeast corner of the Project Site, consistent with the approval of the remediation by the LARWQCB. Per Mitigation Measure HAZ-MM-1, the testing and proper disposal of all excavated soil for the Project Site, including any soils impacted by releases from the former Texaco station, will follow the procedures described in the Soil Management Plan (Appendix B of the Site Summary Report).

As discussed on page IV.F-44 of the Draft EIR, any discharge of groundwater from the temporary construction dewatering will be treated (if necessary) and discharged in accordance with the applicable regulatory requirements under an NPDES permit issued by LARWQCB or an industrial sewer discharge permit issued by the LASAN.

The investigations of the Project Site, as described in the Site Summary Report and pages IV.F-31 to IV.F-32 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, identified several former USTs on-site, all of which were removed and remediated with approval from the appropriate regulatory agency. Specifically, as discussed on page IV.F-44 of the Draft EIR, the Project Site is listed on several UST and LUST (leaking UST) databases related to the former USTs associated with past studio operations, including one 1,000-gallon diesel UST, a 500-gallon diesel UST, and two 8,000-gallon diesel USTs. These four tanks were removed, remediation conducted, and an UST case closure letter was issued by the Los Angeles Fire Department (LAFD) as a Certified Unified Program Agency (CUPA) in 1998, with no further monitoring required. Former USTs on adjacent properties have also been identified; these tanks were also

removed and remediated, as necessary, with approval from the appropriate regulatory agency.

In addition, as discussed on pages IV.F-44 to IV.F-45 of the Draft EIR, the Project Site is listed on several databases associated with the two gas stations formerly located on-site, specifically the Anderson V L station at 7870 Beverly Boulevard and the Texaco station at 7718 Beverly Boulevard. The status of any former USTs at the former Anderson V L gas station is unknown; however, geophysical surveys have confirmed no tanks remain in the location of this former gas station. The former Texaco station contained one 10,000-gallon and three 12,000-gallon USTs, which, along with dispensers, associated piping and pump islands, were removed during station demolition in 1991. LARWQCB issued a No Further Action letter for the former Texaco station on November 29, 2012. Geosyntec performed environmental investigations to confirm the extent of the constituents known to remain on-site, and elevated concentrations of fuel-related constituents were detected in soil and groundwater downgradient of the former Texaco station. No other records were found that indicate the presence of USTs within the Project Site. Notwithstanding, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if USTs are encountered, prior to removal, applicable permits would be obtained from LAFD. As such, with compliance with applicable regulations and requirements, Project construction activities would not exacerbate the risk of upset and accident conditions associated with USTs. Therefore, impacts related to the potential discovery or removal of USTs during construction would be less than significant.

This comment mentions mineral resources. However, as discussed on pages 64 to 65 of the Initial Study for the Project (included as Appendix A.1 of the Draft EIR), the Project would have no impacts on mineral resources.

The comment regarding liability for damages does not concern the environmental analysis in the Draft EIR; therefore, no further response is required.

This comment incorrectly states that a revised program EIR is required. The Draft EIR is a "Project EIR," as defined by Section 15161 of the CEQA Guidelines. This comment does not provide any evidence that a program EIR is required under CEQA. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 13-7

Cultural resources have been encountered in the Rancho LaBrea [sic] tar pit and surrounding and must be expected beneath the SP site, and they must be protected by standard consistently implemented/enforced throughout the life of the SP Program. In fact, consistent with the general proposed projects, exhibitions of historic, cultural, and

paleontological resources could be preserved and displayed for community education as to the site and area.

Paleontological resources—a new potential Rancho LaBrea [sic] tar pits have been encountered in the Rancho LaBrea [sic] tar pit and surroundings and must be expected beneath the SP site, and they must be protected by standard [sic] consistently implemented/enforced throughout the life of the SP Program. In fact, consistent with the general proposed projects, exhibitions of historic, cultural, and paleontological resources could be preserved and displayed for community education as to the site and area.

Response to Comment No. 13-7

Regarding cultural resources, Section IV.B, Cultural Resources, of the Draft EIR and the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR both address the type of archaeological materials that have been found in proximity and could occur within the Project Site. As described on page IV.B-57 of Section IV.B, Cultural Resources, of the Draft EIR, and page 28 of the Tribal Cultural Resources Report, the archaeological discoveries recorded during development of The Grove at Farmers Market Project were composed entirely of historic-period (nineteenth and twentieth century) archaeological resources, designated as Site CALAN-3045H.¹¹⁶ Most of the significant archaeological components recorded in CA-LAN-3045H are associated with historical land uses that are specific to their respective locations and are not strictly equivalent to the setting of the Project Site or the La Brea Tar Pits. The past use by the Native Americans of the La Brea Tar Pits, an important source of asphaltum (tar) and an archaeological site designated as CA-LAN-159, is described on pages 18 and 33 of the Tribal Cultural Resources Report. As discussed on page IV.B-57 of Section IV.B, Cultural Resources, of the Draft EIR, despite the proximity of CA-LAN-159 to the Project Site, no prehistoric archaeological resources were identified within the Project Site or within 0.5 mile of the Project Site. However, the proximity of CA-LAN-3045H to the Project Site is noted on page IV.B-58 of Section IV.B, Cultural Resources, of the Draft EIR, which recognizes that there is some potential for unknown historic-period materials in the Project Site. Thus, the Draft EIR adequately considers the type of archaeological resource most likely to be encountered, and provides a reasonable means of mitigating potentially significant impacts if such a resource is identified. The Archaeological and Tribal Cultural Resources Supplemental Memorandum (Supplemental Cultural Memo) in response to public comment included in Appendix FEIR-14 of this Final EIR adds further detail to these archaeological resources that further reinforces the findings presented in the Draft EIR.

¹¹⁶ The Draft EIR refers to this site as P-19-003045/CA-LAN-003045H, which combines both the primary and trinomial resources identifiers from the California Historical Resources Information System (CHRIS) database. For ease of reading and consistency, this site is referred throughout the public comments section as CA-LAN-3045H.

Mitigation Measure CUL-MM-1, which is included on pages IV.B-58 and IV.B-59 of the Draft EIR, includes provisions to ensure that any significant archaeological resource that may be identified during the Project are given adequate protection. Mitigation Measure CUL-MM-1 also incorporates professional best practices for archaeology by requiring that the principal archaeologist meet the Secretary of the Interior (SOI) Professional Qualification Standards (PQS)¹¹⁷ and that the Cultural Resource Monitoring and Treatment Plan (CRMTP) be prepared in accordance with the SOI's *Standards for Archeological Documentation Guidelines (SOI Documentation Standards)*.¹¹⁸ The *SOI Documentation Standards* provides generalized guidance on how field recording, analysis, reporting, and curation are fulfilled. Therefore, this mitigation measure complies with applicable regulations and meets industry standards. Refer to pages 5 and 6 of the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, for an expanded discussion of the standard professional practices and regulatory compliance as they relate to the formulation and implementation of Mitigation Measure CUL-MM-1. Mitigation Measure CUL-MM-1 has also been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

Regarding paleontological resources, as stated on pages IV.D-15 and IV.D-16 in Section IV.D, Geology and Soils, of the Draft EIR, although no previously encountered vertebrate fossil localities were identified within the Project Site, it was conservatively assumed that paleontological resources could be discovered at the Project Site because such resources have been found at seven properties within approximately 4,000 feet of the Project Site in older Quaternary age sedimentary deposits known as Pleistocene age deposits. The Pleistocene age alluvial deposits have been documented at the Project Site underneath the artificial fill on page 5 of the Preliminary Geotechnical Engineering Investigation (see Appendix E.1 of the Draft EIR), the report states that "older alluvium" was found below the artificial fill. The boring logs in the report describe in detail the nature of the soil below the artificial fill, which is also described as Quaternary clay, silt, sand, and gravel in the Preliminary Geotechnical Engineering Investigation included as Appendix E.1 of the Draft EIR at page 3. Published geological mapping defines the older surficial sediments mapped below the Project Site as "late Pleistocene age."¹¹⁹

¹¹⁷ National Park Service, Professional Qualifications Standards, www.nps.gov/articles/sec-standards-prof-quals.htm, accessed November 7, 2023.

¹¹⁸ National Park Service, Archeological Documentation Guidelines, www.nps.gov/articles/sec-standards-archeo-doc-guidelines.htm, accessed November 7, 2023.

¹¹⁹ Dibblee, T.W. and H.E. Ehrenspeck, Geologic map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California, Dibblee Geological Foundation, Dibblee Foundation Map DF-30, 1:24,000, 1991.

Therefore, as stated on pages IV.D-16 and IV.D-26 to IV.D-28 of Section IV.D, Geology and Soils, of the Draft EIR, there is a potential to disturb paleontological resources at depths within previously undisturbed sedimentary deposits of Pleistocene age, and impacts would be potentially significant. To address potential impacts to paleontological resources, a Paleontological Resources Mitigation and Treatment Plan shall be developed and paleontological monitoring would be required during excavation within Pleistocene age deposits. The monitoring program would follow the guidelines outlined by the Society of Vertebrate Paleontology (SVP 2010) and include sediment sampling protocols for microfossil recovery. No monitoring would be required during excavation within artificial fill, as these deposits do not contain paleontological resources in their original stratigraphic context and thus have a low sensitivity. With the implementation of Mitigation Measure GEO-MM-1, Project-level impacts to unique paleontological resources would be reduced to a less-than-significant level. Refer to Response to Comment No. 35-91 regarding revisions to Mitigation Measure GEO-MM-1 and Section III, Revisions, Clarifications and Corrections for the specific text revisions. With implementation of the revised mitigation measure and through consistency with the 2010 SVP Guidelines, any paleontological resources could be preserved and displayed for community education, which is a decision to be made by the museum which may take the donated paleontological resources collection.

Comment No. 13-8

Hydrologic resources are also not considered (= [sic] totally inadequate/incomplete) although the groundwater is generally quite shallow, expected at less than 30ft [sic] below surface and is easily recognized at the ponds over the tar pits, 3900ft [sic] to south. The Specific Plan must incorporate and enforce the Low Impact Development (LID) requirements of the City and eliminate the significant impacts of even a 3/4in [sic] rain in 24-hours from such a large area without adequate collection, storage and reuse systems in place (e.g., 3/4in [sic] on 1000sf [sic] roof = 400+gal [sic] in 24hr, [sic] one acre = $43.56 \times 400 = >17,500$ gal/acre). As no irrigation space will be available for recycling, and collected rain runoff must be convey to other areas, Pan Pacific Park across Grove, or discharge for replenishment of the underlying groundwater table, after a thorough study of the groundwater table so as to not impacted by such replenishment.

Response to Comment No. 13-8

Contrary to the assertion in this comment, the Draft EIR included a comprehensive analysis of hydrologic resources in Section IV.G, Hydrology and Water Quality, of the Draft EIR. As discussed in Response to Comment No. 3-4, the Project has considered the hydrogeology of the Project Site, and stormwater management during operation was specifically addressed on page IV.G-30 of Section IV.G, Hydrology and Water Quality, of the Draft EIR.

As discussed in the Draft EIR and Response to Comment No. 3-4, the Project would comply with the City's LID Ordinance. As discussed on page IV.G-30 of Section IV.G, Hydrology and Water Quality, of the Draft EIR, the LID Ordinance requires the capture and management of the greater of an 85th percentile rain event or the first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs through one or more of the City's preferred LID improvements in priority order: onsite infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible. The City's LID Ordinance provides a number of alternatives for stormwater management. As discussed on page IV.G-30 of the Draft EIR, based on the Preliminary Geotechnical Engineering Investigation prepared for the Project (included as Appendix E.1 of the Draft EIR), infiltration is not feasible. As discussed in Section 6.2.1 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project Site is currently approximately 90 percent impervious, and is expected to remain approximately 90 percent impervious post-construction. Since infiltration has been determined to be infeasible by the Preliminary Geotechnical Engineering Investigation, the next tier of treatment is a stormwater capture and use system. As described in Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project would include the installation of a capture and reuse system to be used for irrigation. If that approach is later determined to be infeasible, high efficiency biofiltration/bioretenion systems, consistent with the LID requirements, would be installed. In either case, BMP systems will be designed within the Project Site to capture the typical urban contaminants found in stormwater. The stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards. As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Further, the current stormwater is discharged without any such controls, and the BMPs installed as part of the Project would be an improvement over the current conditions. Therefore, as stated on page IV.G-30 of the Draft EIR, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements and impacts to surface water quality during operation of the Project would be less than significant.

As discussed in Response to Comment Nos. 3-7 and 11-25, dewatering would be limited to temporary dewatering during construction, and there will be no long-term impact on the water table in the vicinity of the Project. Refer to the Dewatering Report included as Appendix FEIR-13 of this Final EIR.

Comment No. 13-9

Land Use resources have not adequately or completely assessed the specific requirements for FAR, floor area ratios, and building heights (feet/stories). All covered floored areas must be considered as part of the floor area and storage/holding/processing conducted on covered/floored surfaces must be included in calculating the floor area ratios.

Response to Comment No. 13-9

Section II, Project Description, of the Draft EIR includes a description of the Project's floor area, FAR, and building height limits. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, regarding the Project's definition of floor area and how all of the Project uses, areas and activities have been fully accounted for in the impact analyses throughout the EIR. Refer to Section IV.H, Land Use and Planning, of the Draft EIR for a comprehensive analysis of the Project's land use impacts in accordance with CEQA. As concluded therein, impacts would be less than significant. Refer to Response to Comment Nos. 9-16 and 11-3 regarding the height and size of the Project.

Comment No. 13-10

Similarly, considerations must be provided regarding growth inducement forces which influence the opposing sides of major arterials. If high rise is allowed along one side of Fairfax and Beverly, the assessment and mitigation must consider the opposing street frontage will eventually be developed similarly. The Specific Plan must be considered to induce similar developments along the northside of Beverly and west side of Fairfax and beyond. Mitigation beyond the Program site limits must be assessed and funded by the Program.

VI-14/3 Other CEQA Considerations—Growth The [sic] DEIR considers growth inducing aspects but does not provide any current growth projects (LADCP or SCAG—Southern Calif. Assoc. Govts.) for the “Transportation Analysis Zones” including the Program site. Based on general review, the proposed general Program would far exceed current population, households, and jobs projections by DCP using the current Community Plan or by SCAG projections for TAZs including the Project. Therefore, land use and demographic impacts must be considered as significant for the Program overall and must be revised consistently with SCAG/DCP projects of TAZs involving the Program site.

Response to Comment No. 13-10

The comment includes the commenter's claim that the Project's height zones would affect adjacent properties. The height zones identified in Section II, Project Description, of the Draft EIR and in the proposed Specific Plan are only applicable to the Project Site. Thus, the Project would not induce or increase building heights outside of the Project Site.

Also refer to pages VI-15 through VI-16 of Section VI, Other CEQA Considerations, of the Draft EIR for details regarding the Project's consistency with SCAG's growth projections, which are the projections that the City uses in its analysis for determining consistency of a project with future growth. The City of Los Angeles VMT Calculator assumes growth in all traffic analysis zones (TAZs) in the City based on the City's General Plan which, in turn, is based on the growth assumed in each TAZ in the SCAG regional land use and transportation model. So, it is incorrect to say that the Draft EIR technical analyses do not reflect long-range land use growth projections by the regional agency.

Comment Letter No. 14

Oscar Arslanian
Publisher
Discover Hollywood Magazine
5419 Hollywood Blvd., Ste. C717
Hollywood, CA 90027-3480

Comment No. 14-1

I'm writing to express my support for the new investment in Television City located at Beverly Blvd. and Fairfax Avenue.

I am the publisher of Discover Hollywood Magazine, a publication with a 35 year mission that extols the unique culture and lore of Hollywood, board member of the Hollywood Arts Council and past Chairman of the Board of the Hollywood Chamber of Commerce, [sic] I value our entertainment industry and the economic and cultural benefits it brings to the City. We need to support local production growth and responsible development that will bring new studio space to Los Angeles.

This plan will ensure the future of Television City, one of Los Angeles' most iconic studios, by modernizing the complex and adding new sound stages and production facilities. The project will deliver new, technology-rich studio" space that content creators demand and provide the ability to adapt to an ever-changing entertainment industry, while keeping production and jobs in Los Angeles.

Also, I'm delighted to learn through the Draft EIR that the project will not result in any significant impacts during studio operations. This is good news for the community. I appreciate the studio's commitment to invest in the City and look forward to the many benefits this project will provide.

Response to Comment No. 14-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 15

Jacqueline Canter
Fairfax Business Association
419 N. Fairfax Ave.
Los Angeles, CA 90036-1716

Comment No. 15-1

My name is Jacqueline Canter. My family owns Canter's. I am the founder and President of the Fairfax Business Association.

I am in full support of TVC 2050. It will bring jobs to the community. If you have any questions, feel free to call me.

Response to Comment No. 15-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 16

Laura Lake
Fix the City
laura.lake@gmail.com

Comment No. 16-1**FIX THE CITY REQUESTS A SUPPLEMENTAL EIR FOR TVC: SHOW US THE SPECIFIC PLAN AND DEVELOPMENT AGREEMENT, THEN DO YOUR ANALYSIS**

CEQA is a disclosure law that mandates mitigation where feasible. ***This EIR fails to provide disclosure.*** It claims to analyze the impacts of an invisible Specific Plan and an invisible Development Agreement and ignores the impacts of the project on the Housing Element. *As a result, the entire analysis is speculative and prohibited by CEQA.*

A specific plan lays out exactly what use is permitted in each part of the property. This does not. A “conceptual plan” is not the legal or functional equivalent of a draft specific plan.

The project description is not stable. It is intentionally vague: it could take 32 months or 20 years... it is bigger-than-a-bread-box-and-smaller-than-a-house. The public is entitled to a transparent review process. ***CEQA requires that the curtain be pulled back*** and a good-faith, objective analysis of the proposal be presented. While DCP always insists its analysis is objective, it has an institutional conflict of interest: its budget relies on developer fees.

Response to Comment No. 16-1

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the fact that a draft Specific Plan was not required to be included as part of the Draft or Final EIR and how the physical aspects of the proposed Specific Plan are fully accounted for in Section II, Project Description, of the Draft EIR and in the associated impact analyses throughout the Draft EIR. Also refer to Response to Comment Nos. 5-5 and 9-12 regarding the conceptual plans, and Response to Comment No. 9-15 regarding the degree of specificity in a specific plan EIR and how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and fully complies with CEQA. These topics are also comprehensively addressed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Thus, contrary to this comment, a supplemental EIR is not required.

With regard to the Project’s timeframe, refer to Response to Comment No. 9-24.

Regarding the proposed Development Agreement, the component of the Development Agreement that is relevant to the environmental analysis is the 20-year term, which could extend buildout of the Project to approximately 2043. Also note that the Development Agreement would only allow for development consistent with the Project described in the certified EIR. Other provisions of the Development Agreement would be contractual matters between the City of Los Angeles and the Applicant and do not constitute environmental impacts under CEQA. Accordingly, CEQA does not require a Development Agreement to be included as part of the Draft EIR. A draft Development Agreement will be made publicly available on the Department of City Planning's website prior to public hearings on the Project.

Comment No. 16-2

The project is inconsistent with the Housing Element. It proposes eliminating thousands of residential units [sic] from this property that are included in the Housing Element. Impacts on housing are on the CEQA checklist, and yet they were not addressed. This omission must be addressed in a supplemental EIR as well. The same holds true for the removal of the designation of Mixed-Use Boulevards for both Fairfax and Beverly Blvds. This project flagrantly ignores the city's goal of a jobs-housing balance.

SB 375 justifies streamlining as an incentive to encourage residential or mixed -use [sic] residential projects which help achieve AB 32 goals to reduce GHG emissions. (D.IV-H Land Use and Planning, p. 2). This site is designated for thousands of housing units in the Housing Element of the General Plan. But the project does not provide housing or the mixed-use development presently designated for both Fairfax and Beverly Blvds. Therefore, it is ***not entitled to streamlined processing*** under CEQA. What is the substantial evidence to support streamlining for this project?

The General Plan Framework designated this property to serve the adjacent community and provide neighborhood commercial in Mixed Use projects (Attachment A). ***Instead, this project turns its back on the community.***

- This project does not need a Regional Center designation to rebuild.
- There is nothing preventing the owner from rebuilding the studio.
- There is nothing preventing the owner from building only commercial office buildings.
- But there is a prohibition against increasing density if emergency services are inadequate or if infrastructure is inadequate. This will be addressed in detail below.

- The FAR calculation for TVC does not comply with LAMC per EIR Footnote 1:

“The proposed approximately 1.874 million square feet of floor area per the Specific Plan definition is equivalent to approximately 1.984 million square feet based on the LAMC definition and approximately 2.103 million gross square feet.”

- The DEIR also mentions **converting garages** (which do not count toward FAR) to other uses. This would add even more FAR. How much more FAR would be added? How is a garage converted to other uses?

Response to Comment No. 16-2

The commenter alleges that the Project is inconsistent with the Housing Element of the General Plan, which is incorrect. The Project does not involve a change in the number of residential dwelling units permissible under the Project Site’s zone classification. The Project involves a Vesting Zone Change request from the C1.5 and C2 Zones to a proposed TVC Zone and assigns the TVC Zone to an approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County to be annexed to the City of Los Angeles. Fundamentally, the TVC Zone is a mixed-use zone consistent with the existing C1.5 and C2 zoning designations. The purpose of the creation and application of the TVC Zone is to implement and effectuate the proposed Specific Plan, which is a studio specific plan. The proposed Specific Plan would not expressly prohibit the development of residential dwelling units on-site, as such development would be regulated by the zoning existing at the time of Project application filing. Any future residential development would require a subsequent discretionary approval and CEQA compliance review.¹²⁰ The Project also involves a General Plan Amendment to change the various land use designations of the Project Site to a consistent Regional Commercial designation and assign the Regional Commercial designation to the portion of the Project Site to be annexed to the City. Typically, this change of land use designation would alter the allowable residential density pursuant to Section 12.22 A.18 of the LAMC. However, in the case of the Project, no changes to the permissible residential density will be provided by the General Plan Amendment per the regulations of the Preliminary Draft Specific Plan. Refer to Response to Comment Nos. 5-8 and 11-29 for further elaboration on the General Plan Amendment to the Regional Commercial designation.

¹²⁰ In accordance with California Government Code Section 66300(b)(1), the Preliminary Draft Specific Plan provides that the Project Site may also be developed with residential uses allowed in accordance with density and all other development standards of the C2-1-O, C1.5-2D-O, and the C-MJ Zones, as in effect on May 13, 2021 and subject to all applicable municipal and State laws. Any future residential project would be required to comply with the development review procedures identified in the Specific Plan.

It should also be noted that nowhere in the scope of the Project's General Plan Amendment is there a request to alter or delete the Mixed Use Boulevard designation applicable to Fairfax Avenue or Beverly Boulevard, as identified by the General Plan Framework Element in Figure 3-1 and included as Attachment A to this Comment Letter. As discussed above, the Project includes a request for a General Plan Amendment from various land use designations of the Project Site to a consistent Regional Commercial designation and assigns the Regional Commercial designation to the portion of the Project Site to be annexed to the City. As stated in Figure 3-1 of the Framework Element, adoption of the Framework Element neither overrides nor mandates changes to the Community Plans but provides general recommendations to assist in determining the individual needs and opportunities of each Community Plan Area. Therefore, the commenter's allegation that a Mixed Use Boulevard designation will be removed is inaccurate, and the Project's proposed General Plan Amendment and adjacency to a Mixed Use Boulevard is not incongruous.

The Project is not requesting "streamlined processing" under SB 375. As discussed in Section II, Project Description, of the Draft EIR, the Project is the continuation of an existing studio use and the modernization and expansion of media production facilities within the Project Site and is, therefore, not a residential or a mixed-use residential project. Regardless, the Project complies with the Sustainable Communities Strategy established by SCAG pursuant to SB 375. The commenter has provided no new significant information to question or refute the conclusions of the analysis within the Draft EIR related to the Project's compliance with SB 375 air quality and emissions targets.

Further, the Project has complied with all standard processes and procedures related to the preparation, circulation, and publication of an EIR and has not proposed or received "streamlined processing" to expedite or eliminate required milestones. Consistent with Section 15082 of the CEQA Guidelines, the City of Los Angeles prepared a Notice of Preparation to provide the public, nearby residents, property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The associated public comment period began on July 2, 2021 and ended on August 2, 2021, during which a Scoping Meeting was held by the City of Los Angeles on July 20, 2021. Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and the Los Angeles County Clerk and was circulated for public review and comment for a 60-day period, exceeding the CEQA-required 45-day review period. This original 45-day comment period began on July 14, 2022, and was to end on August 29, 2022. In response to a request from Councilmember Paul Koretz's office, on August 19, 2022, the City of Los Angeles extended the comment period by an additional 15 days to September 13, 2022. In sum, the Project is consistent with applicable requirements of SB 375 and has not requested or been granted streamlined processing.

As identified in Table II-2 of Section II, Project Description, of the Draft EIR, a maximum of 700,000 square feet of general office would be permitted by the proposed Specific Plan. Buildout of the general office uses has been analyzed in full in the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Topical Response No. 3, Permitted On-Site Uses, regarding the five proposed studio uses. The Project does not include only office uses because such a proposal would not meet the Project objectives set forth in Section II, Project Description, of the Draft EIR.

Further, the Project does not involve “rebuilding” the studio as the Project proposes to rehabilitate and preserve the integrity of HCM No. 1167 (CHC-2018-476-HCM) located on-site, a scope of work which has been analyzed in Section IV.B, Cultural Resources, of the Draft EIR.

The commenter also conflates various definitions of floor area, including floor area as defined by Section 12.03 of the LAMC, floor area as defined by the proposed Specific Plan, and building area as defined by the California Building Code. The associated FAR calculation for the Project is consistent in the discussion and analysis presented throughout the Draft EIR, and the commenter has provided no evidence to question or refute the conclusions of the Draft EIR with regard to floor area and building area. See Topical Response No. 2, Definition of Floor Area is Appropriate, for further elaboration on the definition of floor area.

The commenter questions potential future conversions or changes of use to areas not initially tabulated in the Project’s FAR to areas that would meet the definition of floor area for the purposes of calculating the Project’s FAR. As detailed in Table II-2 of Section II, Project Description, of the Draft EIR, the proposed Specific Plan allows maximum amounts of floor area for each type of allowable use on-site, with a Land Use Exchange Program (described on pages II-16 to II-17 of the Draft EIR) allowing limited exchanges in the amount of floor area between certain permitted studio land uses. Conversion of area not currently tabulated as floor area would count towards the maximum amounts of floor area for each type of allowable use, and has therefore been considered in the analysis of the Draft EIR. As mentioned throughout the Draft EIR, the proposed Specific Plan would limit the total floor area to a maximum of 1,874,000 square feet, which was analyzed in the Draft EIR. Refer to Response to Comment Nos. 5-7 and 9-14 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Land Use Exchange Program.

With regard to jobs/housing balance, as discussed on page IV.K-68 of the Draft EIR, the Project supports initiatives to create transit-oriented developments by expanding employment opportunities near housing and promoting the jobs/housing balance in a dense urban area served by multiple forms of transit.

With regard to density increases and emergency services, refer to Response to Comment No. 16-5.

With regard to the preparation of a supplemental EIR, this comment does not provide substantial evidence to demonstrate that a supplemental EIR is required per Public Resources Code Section 21166 or CEQA Guidelines Section 15163. Accordingly, a supplemental EIR is not required.

Comment No. 16-3

The detailed comments that follow focus on the lack of adequate emergency services (police, fire) that are required by the General Plan Framework to be adequate before any discretionary increase in density is approved, or a new Regional Commercial Center approved.

Response to Comment No. 16-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 16-4 through 16-78.

Comment No. 16-4

Regional Commercial Centers typically have a Height District 2 designation that allows 6:1 FAR, and are immediately adjacent to rail transit. This application appears to be a trojan horse for the 6:1 FAR on 25 acres of prime real estate that is about a mile from mass transit.

This project is inconsistent with the General Plan Framework (GPF). The General Plan Framework targets areas for high density in Commercial Regional Centers. GPF Figure 3-1, The Long-Range Land Use Diagram (Attachment A) does not show this site as a Regional Commercial Center. Approving a Regional Commercial Center is therefore inconsistent with the Long-Range Land Use plan for this area. It is ***spot-zoning on a massive scale.***

The applicant says it will increase entertainment jobs—but it could all be commercial offices. ***This project is a blank check for commercial office development.*** The Paramount update used only 1.2:1 FAR on a 60-acre lot. This is far more intense.

Response to Comment No. 16-4

The commenter incorrectly alleges that the Project's proposed General Plan Amendment to change the land use designation of the Project Site from various designations to a unified Regional Commercial is a method for achieving a greater permissible FAR. Refer to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial designation, which does not allow for increased density or constitute spot zoning, contrary to this comment. In addition to the proposed General Plan Amendment, the Project is requesting a Vesting Zone Change from the C1.5 and C2 Zones to the TVC Zone and to assign the TVC Zone to an approximately 0.63-acre portion of the Project Site in an unincorporated area of the County to be annexed to the City. The purpose of the TVC Zone is to implement and effectuate the proposed Specific Plan. The Project Site's FAR will be governed by the regulations of the Specific Plan. As such, the commenter's elaboration on Height District designations and FAR limitations is not applicable to the Project since allowable FAR for the Project Site will be governed by the Specific Plan.

Contrary to the commenter's assertion, multiple parcels in the City of Los Angeles that are designated Regional Commercial are subject to FAR limitations of approximately 1.5 to 2. For example, the recently adopted, but not yet in effect, Hollywood Community Plan classifies central Hollywood as Regional Commercial with large swaths of parcels located in Height District 2 but carrying "D" Development Limitations enacted by City Council land use ordinance containing a range of FAR restrictions from 1.5 to 4. In the valley geography of the City of Los Angeles, the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan classifies the approximately 1.7 square-mile Warner Center neighborhood as Regional Commercial with corresponding FAR limitations between 1 and 2, and the Chatsworth–Porter Ranch Community Plan classifies an approximately 109-acre area surrounding the intersection of Tampa Avenue and Nordhoff Street as Regional Commercial with a corresponding FAR of 1.5 per the underlying zone. In South Los Angeles, the West Adams–Baldwin Hills–Leimert Community Plan classifies an approximately 62-acre area surrounding the intersection of Crenshaw Boulevard and Martin Luther King Jr. Boulevard as Regional Commercial with a corresponding FAR of 1.5 per the underlying "D" Limitations. Furthermore, there are numerous larger sites like Television City, including Universal Studios and the ICON at Panorama development located at 14665 Roscoe Boulevard, that have a Regional Commercial designation with zoning that permits a 1.5:1 FAR.¹²¹

Additionally, Chapter 3 of the Framework Element of the General Plan identifies that land designated as Regional Commercial is characterized by development that is built to a

¹²¹ See Case No. CPC-2016-2118-VZC-MCUP-CU-SPR-CDO-DD dated May 17, 2018.

FAR between 1.5 to 6.0. As the Specific Plan will allow a FAR of 1.75, the Project is consistent with the development that the Framework Element of the General Plan envisions for the Regional Commercial designation. Refer to Response to Comment No. 5-8 for further information regarding the proposed Regional Commercial land use designation. The commenter also provides contradictory statements regarding the existing General Plan Framework Element's Long Range Land Use Diagram and spot zoning. The Project is requesting a General Plan Amendment to change the Project Site's various land use designations to a unified Regional Commercial designation and to assign a Regional Commercial designation to an approximately 0.63-acre portion of the Project Site located within an unincorporated area of the County to be annexed to the City.

Spot zoning involves applying a zoning designation and/or other land use regulations to a single/small parcel of land that are substantially different from those applicable to other parcels in the vicinity. Refer to Response to Comment No. 11-29 regarding spot zoning.

The Project's potential land use impacts are analyzed on pages IV.H-39 to IV.H-57 in Section IV.H, Land Use and Planning, and Appendix I of the Draft EIR, which include an analysis of the General Plan Framework Element (including the Land Use Chapter, Open Space and Conservation Chapter, Economic Development Chapter, Transportation Chapter, and Infrastructure and Public Services Chapter), General Plan Conservation Element, the Mobility Plan, Wilshire Community Plan, LAMC, Citywide Design Guidelines, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, and the South Coast Air Quality Management District Air Quality Management Plan. As analyzed therein, the Project would not conflict with the goals, policies, and objectives in any of these local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the Draft EIR concluded that impacts related to land use and planning would be less than significant.

This comment incorrectly states that the Project is a commercial office project. As stated throughout the Draft EIR, the Project is a studio project and will include sound stage, production support, production office, general office, and retail uses. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Topical Response No. 3, Permitted On-Site Uses.

Refer to Response to Comment No. 11-3 regarding the size of the Project.

Comment No. 16-5

Under the GPF, if an area not targeted for high density development is upzoned, this would have a significant adverse impact on police and fire service (Chapters 2.10 Fire, and 2.11 Police, FEIR ([Attachment B](#).) Also attached are the GPF ([Attachment C](#)),

the General Plan Framework FEIR ([Attachment D](#)); the GPF Statement of Overriding Considerations ([Attachment E](#)), and the Certification of the GPF by Council, including the NOD which indicates that mitigations are **mandatory** ([Attachment F](#)). In addition, please analyze the LAFD Dispatch Center Map showing a majority of stations without capacity to respond to alarms ([Attachment G](#)).

Response to Comment No. 16-5

This comment does not provide information that is specific to the Project. The analysis of the Project's potential impacts associated with both fire protection and police protection has been completed in consultation with LAFD and LAPD, respectively, using the criteria determined appropriate by each department. With regard to fire protection services, as discussed on page IV.J.1-20 of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, the analysis of fire protection and the need for new or expanded facilities is based on:

[The] project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or storage of hazardous materials. Further evaluation of impacts considers whether or not development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with LAFD is conducted to determine the project's effect on fire protection and emergency medical services.

In its August 6, 2021 letter (refer to Appendix K of the Draft EIR), LAFD considers each of these criteria and concludes that "inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level." Accordingly, as concluded in the Draft EIR, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As such, Project impacts were determined to be less than significant in the Draft EIR, and no mitigation measures are required. Refer to the Confirmatory Fire Analysis included in Appendix FEIR-12 of this Final EIR which confirms that the Project's impacts on fire protection services would be less than significant.

With regard to police protection services, as discussed on page IV.J.2-11 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, LAPD focuses on the residential population within a given service area to evaluate service capacity as well as existing police services provided by the police station serving the Project Site and the availability of police personnel to serve the estimated Project population. As discussed on pages IV.J.2-11 and IV.J.2-12 of the Draft EIR, the Project would not introduce a new residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the Wilshire Division. Therefore, as concluded in the Draft EIR, the Project's impact on police services would be less than significant. Additionally, as provided in Project Design Features POL-PDF-2 through POL-PDF-7 (see pages IV.J.2-12 to IV.J.2-13 of the Draft EIR), the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police services. These include a comprehensive security plan that includes security fencing, secured points of entry, 24-hour security cameras, private on-site security staff, and staff security training protocols. Overall, as stated by LAPD (see Appendix L of the Draft EIR), "the Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities." The Project also would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Thus, Project impacts to police protection services would be less than significant.

The attachments referenced by the commenter, including the dispatch map, are associated with the General Plan Framework EIR that was prepared for the City's Citywide General Plan Framework in June 1996. The LAFD and LAPD data in these attachments from this Final EIR have been updated since 1996. Sections IV.J.1, Public Services—Fire Protection, and IV.J.2, Public Services—Police Protection, of the Draft EIR contain the updated data relevant to LAFD and LAPD services that are pertinent to the analysis of potential impacts associated with fire and police protection services.

The mitigation referenced by the commenter in the General Plan Framework Final EIR with regard to police and fire protection is in the form of Citywide goals, objectives, and policies located in the General Plan Framework itself. The Project's consistency with relevant goals, objectives, and policies from the General Plan Framework, including those related to fire protection and police protection, are discussed in detail on pages 5 and 6 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. Furthermore, in accordance with the fire and police protection-related goals, objectives, and policies set forth in the Framework Element, the City, including LAFD and LAPD, would continue to

monitor the overall demand for existing and projected fire and police facilities and coordinate the development of new fire and police facilities to be phased with growth.

Under CEQA, mitigation measures are only imposed to reduce significant environmental impacts. CEQA Guidelines Section 15126.4 states that “[a]n EIR shall describe feasible measures which could minimize significant adverse impacts,” and “[m]itigation measures are not required for effects which are not found to be significant.”¹²² As discussed above, the Project’s impacts related to fire and police services would be less than significant, and no mitigation measures are required.

Comment No. 16-6

DCP treats the review of land use consistency in EIRs as an exercise in finding policies which support a project, and ignoring those that would prohibit it. This **“cherry picking”** has been called out against the City regarding the Hollywood Community Plan Update by Judge Allan Goodman ([Attachment H](#)). It applies to this General Plan Amendment as well.

- Please identify and analyze the GPF mandatory mitigations that are inconsistent with this project.

For example, this project clearly violates GPF Policy 3.3.2. But there is no mention of Policy 3.3.2. When forced to address it in court, the City claims it is a discretionary policy. It clearly is not. It is “Mitigation Through Policy” with thresholds of significance for both police and fire. The NOD certifying the EIR for the GPF states that mitigations are a condition of approval (Attachment F). Therefore, compliance with Policy 3.3.2 must be addressed in the EIR. ***Otherwise, the city is guilty of failing to enforce CEQA mitigations.***

Response to Comment No. 16-6

This comment does not provide any information that is specific to the Project. With regard to mitigation measures of the General Plan Framework Final EIR, refer to Response to Comment No. 16-5. With regard to thresholds of significance related to the analysis of public services, as set forth on page IV.J.1-20 of Section IV.J.1, Public Services—Fire Protection, and on page IV.J.2-10 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the thresholds of significance were based on Appendix G of the CEQA Guidelines and supported by factors and considerations identified in the City’s 2006 L.A. CEQA Thresholds Guide, as appropriate.

¹²² CEQA Guidelines Section 15126.4(a)(1), (3).

With regard to General Plan Framework Policy 3.3.2, this policy is a Citywide policy regarding monitoring of services capacities Citywide with annual reports submitted to the City Council. This policy is not applicable to the Project. However, note that the related Objective 3.3 within the General Plan Framework regarding accommodating growth through adequate infrastructure and public services is addressed on pages 5 and 6 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. As demonstrated in the analyses therein, the Project would not conflict with this objective. Furthermore, LAFD and LAPD continue to monitor their respective service capacities with regular reports to the City Council.

A comprehensive analysis of the Project's consistency with all applicable plans, including the General Plan Framework Element, is included on pages IV.H-39 to IV.H-56 of the Draft EIR. To support that discussion, a detailed list of the goals, objectives, and policies of the General Plan Framework Element applicable to the Project is provided in Table 1 of Appendix I of the Draft EIR, along with an analysis of the Project's consistency with each particular goal, objective, or policy. The Draft EIR concluded that the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with or impede implementation of the General Plan or the environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-7

This project also violates the **Wilshire Community Plan** ([Attachment I](#)) in several respects. Yet, once again, these inconsistencies are not addressed in the EIR. Judge Goodman made it clear that cherry picking policies that comply while omitting policies, particularly mandatory policies, is not lawful.

- Please identify the Wilshire CP mandatory mitigations and policies, goals, and programs and if the project complies with those mandatory mitigations and findings.

To amend the General Plan by adopting a Specific Plan Regional Commercial Center that increases demand for city infrastructure and public services requires that infrastructure and city services are adequate for current demand and can accommodate additional demand (GPF Mandatory Mitigation Policy 3.3.2). These policies are embedded in the GPF FEIR

as mitigations and certified by the City Council as mandatory mitigations. Note that a **box is clearly checked** on the NOD stating that the **mitigations are a condition of approval**. They are not to be ignored or considered discretionary. The DCP does not have the authority to ignore CEQA mitigations that have been certified by the City Council. This is not a question of discretion to interpret a law or policy. This is a mandatory mitigation with specific thresholds of significance.

GPF FEIR Chapters 2.11 and 2.10 specify that the *thresholds of significance* are not the standard CEQA threshold of significance, i.e., whether new facilities will be constructed (DEIR, IV.J.1-18), but rather, *if service will be adequate*. The answer, according to LAFD is no, it may require new facilities, personnel and equipment, and new water delivery systems for hydrants (DEIR, Appendix K).

GPF FEIR Fire Chapter 2.10 (Attachment B) states the threshold of significance for fire service is NOT whether a new station must be built; it is whether services would be adversely impacted by added demand:

“2.10.2 Thresholds of Significance

Implementation of the City of Los Angeles General Plan Framework would result in a significant impact relative to fire/emergency medical services if it results in one or more of the following:

- If the Plan results in a substantial change in land use (equivalent to the introduction or designation of a Targeted Growth Area) in areas inadequately served currently by LAFD services based upon current General Plan planning standards;” [sic] (GPF, FEIR, p. 2.10-1).
- Please analyze the project’s compliance/noncompliance with this mandatory mitigation measure.

Consistency findings must be supported by substantial evidence, not “aspirational plans.” They must address the thresholds established by the GPF, not the CEQA boilerplate of limiting impacts for police or fire service to only if a new station must be constructed. For twenty years, DCP has abdicated its duty to insure adequate police and fire service. It does not have the authority to ignore the GPF’s mitigation policies.

- Constant updating and monitoring of city plans, the stock response to the adequacy question, is nonresponsive to the required finding of current and future adequacy. *It is the equivalent of the orchestra continuing to play while the Titanic sinks.*

- While CEQA permits statements of overriding considerations for impacts that cannot be mitigated, it does require that those impacts be identified and not ignored.
- CEQA does not permit elements of the General Plan to be inconsistent, and that is what will happen if the inconsistencies between this project and Elements of the General Plan (GPF, Housing Element) are left unaddressed.

Response to Comment No. 16-7

As discussed in Response to Comment No. 16-6, the analysis of potential impacts associated with public services is based on the threshold set forth in Appendix G of the CEQA Guidelines. This threshold specifically addresses whether the Project would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services.

As discussed above in Response to Comment No. 16-5, in using this threshold, the City has determined that the Project's potential impacts on fire protection and police protection would be less than significant. The threshold in the 1996 General Plan Framework EIR is not applicable to the Project. Please note that the commenter's statement that the proposed General Plan Amendment to change the Project Site's land use designation to Regional Commercial would increase demand for City infrastructure and public services is inaccurate.

In addition, a detailed analysis of the Project's consistency with relevant policies of the Wilshire Community Plan is included on pages 17 through 25 of Table 2 in Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. As discussed therein, the Project would not conflict with any of the applicable objectives or policies within the Wilshire Community Plan, including Objective 8-1, Policy 8.1-1, Policy 8.2-2, and Policy 8-2.3 related to police protection and Policy 9-1.1 related to fire protection.

The Project does not propose residential uses, and, therefore, the goals, objectives and policies in the General Plan Housing Element are not applicable to the Project.

Comment No. 16-8

- There is no analysis or assessment of impacts of homelessness on the consumption of emergency services. The traditional way of estimating demand for services is per capita of residents, day-time population (commercial). It is not

known how the city includes the demands of homeless individuals for emergency medical service or for police response. Please explain how both departments evaluate the demand for service and its capacity to meet that demand.

Response to Comment No. 16-8

The potential impact of homelessness on the consumption of emergency services is not an environmental topic under CEQA, and this comment does not discuss information specific to the Project. Notwithstanding, as discussed on page VI-29 of Section VI, Other CEQA Considerations, of the Draft EIR, as no housing currently exists on the Project Site, the Project would not cause the displacement of any persons or housing. Therefore, the Project would not contribute to the consumption of emergency services by people experiencing homelessness. In addition, as discussed in Response to Comment No. 16-5, LAFD and LAPD have been consulted on the Project and the City has determined that the Project's potential impacts on fire protection and police protection would be less than significant. As discussed in Response to Comment No. 16-5, these reviews were based upon a number of factors, including the current ability of the respective departments to respond to requests for service, which would include the consumption of emergency services by people experiencing homelessness.

Comment No. 16-9

Citywide, the deployment of LAFD personnel and equipment involves about 50 stations being dark on any given day. This means that just because there is a fire station near a project site, ***it is not reasonable to assume that it will be available to respond to an alarm***, and that help will come from further away stations and their response time will be hampered by traffic congestion.

- Please provide data on how often Wilshire Plan Area fire stations are dark on a monthly basis for the past two years.
- Please see the LAFD Dispatch Center Map (Attachment G). It shows very few stations are fully available in the City of Los Angeles. Please provide similar maps on an hourly basis for a week for the service area for the proposed project. How often are the six stations dark or not fully staffed?
- Please provide a map that shows all intersections between the first-in station and the project that are LOS E or F as required by City CEQA Threshold Guide (K.2-4). Note that the gridlock experienced around the project site precludes cars pulling to the right to allow emergency vehicles to move. With traffic signal overrides, there is no place to move if the lanes across the intersection are also at a standstill. For evidence of slower response times, each LAFD Annual Strategic Plan shows deteriorating response times.

- How will this project impact response times given the level of congestion at surrounding intersections, and the presence of 18-wheeler trucks attempting to turn corners?
- LAFD fails to report response times as recommended by the National Fire Protection Association 1710, as a percentile of responses within the benchmark time of 5 minutes for a medical emergency (the benchmark is 90% within 5 minutes), and for a fire the benchmark is 90% responses within 5 minutes 20 seconds. Instead, it averages response times. Compounding this situation is the reporting of response times for each fire station on FireStatLA.org only reports the closest station, known as the first-in station. But many times, the first-in station is out, or closed, and more distant stations respond. The response times for non-first-in stations do not show up in public reporting. Please provide these response times.

The data provided in the DEIR is insufficient/misleading for the public and decisionmakers to determine if service is adequate and can accommodate additional demand. Appendix K says it may not be able to meet added demand. More information is required to determine whether fire service is adequate:

- Please provide the response time for the six stations in the Wilshire Plan Area using the benchmark of NFPA 1710 rather than average response times.
- Please provide how many days a month the six stations are dark.
- Please provide what the current staffing is and whether this is considered adequate.
- Please provide a table of response times for the past 10 LAFD Annual Strategic Plans.
- Please address the failure of LAFD to adopt Standards of Cover. When will they be adopted? Is there a draft plan available to share with the public and decision-makers?

Response to Comment No. 16-9

As discussed in Response to Comment No. 16-5, LAFD and LAPD have been consulted on the Project and the City has determined that the Project's potential impacts on fire protection and police protection would be less than significant. These determinations were based on recent data and specific criteria used by LAFD and LAPD. The information requested in this comment varies from the criteria used by City Planning to evaluate impacts associated with fire protection services. Also refer to Response to Comment No. 16-5 regarding LAFD's Letter included in Appendix K of the Draft EIR that was used to analyze impacts associated with fire protection. With regard to LAFD emergency response

times, refer to Response to Comment No. 9-35. Also refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, regarding emergency response during construction.

Comment No. 16-10

The EIR relies on conclusory speculative statements. Therefore, Fix The City therefore submits to the Planning Department 26,000 pages (Attachment J) of substantial evidence of inadequate infrastructure and city services, including emergency services. This evidence is from the City's own websites. ***The evidence makes it abundantly clear that infrastructure and public services are not adequate.*** Several links to city documents are provided here: (http://bss.lacity.org/NeighborhoodCouncils/street_assessment_map/map.html)

- Parks assessment (http://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_085.pdf)
- Sidewalk status (<http://graphics.latimes.com/la-sidewalks-map/>)
- Water pipe status (<http://graphics.latimes.com/la-aging-water-infrastructure/>)

Response to Comment No. 16-10

The documents referenced by the commenter are not specific to the Project. Rather, they address the overall infrastructure status of parks, sidewalks, and water pipes citywide. As discussed in Response to Comment No. 16-5, LAFD and LAPD have been consulted on the Project and the City has determined that potential impacts to fire protection and police protection services would be less than significant. With regard to parks, refer to Response to Comment No. 35-135. With regard to sidewalks, refer to Section II, Project Description, of the Draft EIR regarding the enhanced streetscape improvements that would be implemented as part of the Project.

With regard to “water pipe status” and infrastructure related to fire protection, LADWP determined that the local infrastructure serving the Project Site related to fire flow would be adequate. As discussed on pages 19 and 20 of the Utility Report included as Appendix O of the Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by LAFD, the required fire water flow for the Project Site has been determined to be 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 pounds per square inch (psi), which corresponds to the Industrial and Commercial land use category. As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was

submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR (see Exhibit 2 of Appendix O of the Draft EIR), all six of the existing public fire hydrants (two on Beverly Boulevard, two on Fairfax Avenue, and two on The Grove Drive) flowing simultaneously can deliver combined flows of 9,000 gpm, which falls within the specified fire flow range for the Project. Therefore, based on the IFFAR, there is adequate fire flow available to serve the Project, and the Project would thus comply with its fire flow requirements. As such, as determined by LADWP, local water infrastructure serving the Project Site with regard to fire protection would be adequate.

Comment No. 16-11

Pedestrian Hazards and Queuing Capacity

- ***The multiple driveways create pedestrian hazards*** and need to be consolidated. Please provide mitigation of pedestrian hazards by consolidating driveways.
- ***Queuing distance for driveways appears to be inadequate.*** Please calculate the queuing demand for these driveways and the traffic impacts of inadequate queuing capacity.
- ***There is no internal circulation roadway*** which might mitigate congestion: please address
- There is no analysis of ***how large trucks will access*** the site and the required turning radius for such trucks (i.e., 18-wheelers). How would these large trucks impact the local circulation system, which is already at LOS F in most places?
- How will 18-wheelers seeking to access the site impact congestion and air quality?

Response to Comment No. 16-11

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, mitigation is not required, as incorrectly stated in this comment. Specifically, to address the five comments above:

1. Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding the proposed driveways and pedestrian safety. As discussed in detail therein, the number of driveways is proportional to the increase in the size of development and fewer driveways

would result in a greater mix of trucks and automobiles at each driveway, as well as longer queues, and consolidating driveways would create a number of safety and operational issues. Furthermore, the number of driveways is consistent with LADOT's Manual of Policies and Procedures Section 321. Lastly, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting and construction process, and safety issues like safe sight distance and pedestrian control across the signalized locations would be confirmed in the detailed driveway design approval process.

Refer to Response to Comment No. 9-29 regarding traffic hazards. The comment incorrectly states that the driveways create pedestrian hazards. Refer to Response to Comment Nos. 16-72 and 26-E.4-3 regarding pedestrian safety and the Project's pedestrian-oriented design.

2. Project driveway queueing distance is discussed in Section A, Queueing at Project Driveways, of Topical Response No. 12, Safety and Congestion. Queue lengths at the Project driveways were evaluated and summarized in Section 5B of the Transportation Assessment (included in Appendix M.1 of the Draft EIR) as part of the non-CEQA transportation analysis. As discussed therein, adequate queueing storage would be provided at each Project driveway to minimize the potential for vehicles to back out into the adjacent arterial streets. Thus, the commenter's assertion about inadequate queueing capacity is incorrect.
3. As discussed on pages II-25 to II-26 in Section II, Project Description, of the Draft EIR, the Project would include a multi-level internal circulation system that provides efficient and safe access and circulation for both automobiles and trucks throughout the Project Site. See Figure II-4 on page II-14 of the Draft EIR, which shows the Conceptual Site Plan, including the internal circulation system within the Project Site.
4. Truck turning radius tests have been completed for both existing and proposed driveways to ensure adequate access is provided and the design of each Project driveway would be reviewed and approved by LADOT prior to final construction as part of the regulatory building permit process. The truck trips are included in the Project trip generation, and, thus, the transportation analysis for the Project includes the effects of trucks at the Project driveways and at each of the 31 study intersections. The Project trip generation is shown in Table 6 on page 81 of the Transportation Assessment (Appendix M.1 of the Draft EIR), while Figure 21 (page 77) and Figure 22 (page 80) of the same document show the assignment of Project trips through the study intersections and the Project driveways, respectively. Table 18 of the Transportation Assessment (page 162) summarizes the Project's effects, including the movement of Project trucks, on the performance of the 31 study intersections.

The statement that the local circulation system “is already at LOS F in most places” is incorrect. Table 17 on page 160 of the Transportation Assessment shows that only one of the 60 peak hours tested at the study intersections currently operates at LOS F. With respect to congestion during construction, as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion is not a CEQA impact, and as discussed above, mitigation is not required. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

5. The truck movements in and out of the Project Site, including 18-wheelers, are also included in the air quality analysis in Section IV.A, Air Quality, of the Draft EIR (refer to pages IV.A-59 through IV.A-62 and IV.A-65 through IV.A-67). As discussed therein, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_x emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. As such, Project construction would result in a significant Project-level and cumulative impact related to regional NO_x emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.

Comment No. 16-12

The ***Air Quality analysis*** is so speculative that it is inadequate and must be redone based on a draft specific plan. Los Angeles is a non-attainment area under the Federal Clean Air Act. The GPF was adopted to comply with the Clean Air Act (see Certification, Attachment F).

- What is the status of air quality now and projected in the future?
- How many sensitive receptors will be impacted by increased air pollution due to the operation of the project and of the increased congestion produced by the project?

Response to Comment No. 16-12

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Draft EIR disclosed all elements of the proposed Specific Plan required by CEQA and provided a comprehensive analysis of the Project’s impacts in accordance with CEQA.

Please refer to Section 2.b. in Section IV.A, Air Quality, of the Draft EIR, which provides a discussion of federal attainment status and target years for achieving attainment and discusses the Air Quality Management Plan (AQMP) in effect at the time of the analysis.

Section 3.d in Section IV.A, Air Quality, of the Draft EIR analyzed localized operational air quality impacts resulting from Project emissions consistent with SCAQMD Localized Significance Threshold (LST) guidelines. As shown in Table IV.A-10 of the Draft EIR, Project localized operational emissions would not exceed SCAQMD significance thresholds, resulting in a less-than-significant impact. Thus, no sensitive receptors would be impacted by increased air emissions due to the operation of the Project.

Section 3.d in Section IV.A, Air Quality, of the Draft EIR also analyzed air quality impacts associated with Project vehicle trips. Consistent with the carbon monoxide (CO) methodology discussed on page IV.A-45 in Section IV.A, Air Quality, of the Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At Project buildout, the highest average number of daily trips at an intersection would be approximately 65,260 trips at La Brea Avenue and Beverly Boulevard, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP. Therefore, the Draft EIR correctly concluded that the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots, and impacts related to localized mobile source CO emissions would be less than significant. Thus, no sensitive receptors would be impacted by Project-related vehicular air emissions due to the operation of the Project.

Comment No. 16-13

There is no identification of off-site parking locations, the number of spaces, the hours of off-site parking, or analysis of neighborhood traffic intrusion, an adverse environmental impact.

- Will off-site parking be within the code-required distance from the project site? How can a traffic analysis be conducted if the parking and circulation patterns of off-site spaces are not identified.
- Leased facilities can be canceled easily. By contrast, covenanted spaces within proximity to the project site, are a more reliable basis for parking demand.

Response to Comment No. 16-13

The Project no longer proposes off-site parking. Refer to Section B, Off-Site Parking, of Topical Response No. 13, Parking, and Section III, Revisions, Clarifications,

and Corrections to the Draft EIR. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips. As discussed therein, the adequacy of a project's parking supply and cut-through effects are not environmental impacts under CEQA.

Comment No. 16-14

When repeatedly challenged by Fix The City to make of adequacy for infrastructure and public services, the DCP has relied on “aspirational” plans rather than substantial evidence of adequacy, and claimed it is monitoring and updating plans. That is nonresponsive to the question at hand: adequacy of infrastructure and public services, particularly Police and Fire, using the thresholds in the GPF FEIR. This EIR ignores the answer from the Fire Department that fire service may be inadequate. That is substantial evidence. ***But nowhere in the EIR is there an answer to whether police and fire service are adequate now, or if they could accommodate added demand.*** Please provide analysis that answers these questions.

Does the project area have enough sworn officers? The answer is no. Based on the General Plan Framework, as of 2001, ***an adequate number citywide was 17,673 sworn officers*** (Statement of Overriding Considerations, FEIR, p. 20, Attachment E). Today LA has around 9,300 sworn officers and a larger population. Please analyze the demand for service from the homeless population in addition to the residential and commercial populations.

The DEIR fails to address mandatory CEQA mitigations in both the General Plan Framework Element (GPF) and the WLA Community Plan (CP). *The required finding is not whether new police or fire facilities are required, but if police, fire, and infrastructure are ADEQUATE as defined in the GPF and the CP, and if the project is consistent with mandatory policies and mitigations.*

Response to Comment No. 16-14

With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-147, and 35-133.

With regard to the number of sworn officers, the analysis within Section IV.J.2, Public Services—Police Protection, of the Draft EIR accounts for sworn officers citywide and within the service area of the Project Site. As stated on page IV.J.2-7 of the Draft EIR,

according to LAPD's correspondence (see Appendix L of the Draft EIR), the departmental staffing resources include 9,506 sworn officers.

With regard to the homeless population, see Response to Comment No. 16-8.

With regard to public services objectives and policies within the General Plan Framework and Wilshire Community Plan, refer to Response to Comment Nos. 16-5 and 16-7, respectively.

Comment No. 16-15

Furthermore, in making required general plan and community plan findings, DCP cherry-picks General Plan Framework or Community Plan policies which support an approval and excludes policies that are blatantly violated by an approval, and fails to support its findings with substantial evidence.

Cherry-picking policies that a project supports while ignoring the policies and mitigations that are violated, without substantial evidence is unlawful, as stated clearly by LA Superior Court Judge Alan Goodman regarding Fix The City's lawsuit challenging the Hollywood Community Plan Update ([Attachment H](#)).

Response to Comment No. 16-15

The Project's lack of conflict with the General Plan is discussed on pages IV.H-39 through IV.H-44 of Section IV.H, Land Use and Planning, and on pages 1 through 25 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. The policies evaluated therein were not chosen at will but are the policies applicable to the Project that were adopted for the purpose of avoiding or mitigating an environmental effect, which is the threshold under Appendix G of the CEQA Guidelines.

As identified in Chapter 1 of the Framework Element, "State law recognizes that the diversity of the State's communities and their residents and, thus, requires them to implement the general plan law in ways to accommodate local conditions while meeting its minimum requirements" (Gov't Code § 65300.7). Further, State law recognizes that cities' and counties' capacity to respond to State planning law will vary due to the differences between them in size, characteristics, population, density, fiscal and administrative capabilities, land use and development issues and human needs (Gov't Code § 65300.9). As a result, State law has given a city with the diversity and size of Los Angeles latitude in formatting, adopting and implementing its general plan, as long as it adheres to the minimum requirements of State law. Further, Chapter 10 of the Framework Element acknowledges the latitude provided by State law for the purposes of implementing General Plan goals, objectives, and policies, by stating "not all plan policies can be achieved in any

given action, and in relation to any decision, some goals may be more compelling than others. On a decision-by-decision basis, taking into consideration factual circumstances, it is up to the decision makers to decide how to best implement the adopted policies of the general plan in any way which best serves the public health, safety and general welfare.” In conformance with these provisions of the Framework Element of the General Plan, consistency analyses related to the Project’s conformance with each element of the General Plan are provided in applicable sections of the Draft EIR. In particular, refer to Section IV.H, Land Use and Planning, and Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR.

Additionally, contrary to the commenter’s suggestion, the Department of City Planning has neither made any decision on the Project nor issued any determinations on any component of the Project. The findings for the proposed General Plan Amendment would be prepared subsequent to the publication of the Project’s Final EIR and would be provided to the decision-makers within the Staff Recommendation Report, prior to any decision being made on the Project.

Comment No. 16-16

The city has repeatedly claimed in litigation that Policy 3.3.2 is discretionary. Fix The City submits substantial evidence, the NOD certifying the adoption of the FEIR for the General Plan Framework (Attachment D) as evidence of the mandatory obligation to implement the mitigations of the GPF. *The NOD clearly states that the mitigation measures are mandatory.* **The city is failing to implement mandatory CEQA mitigation measures adopted by the City Council when it certified the General Plan Framework.** GPF Policy 3.3.2 is a policy included as “Mitigation Through Policy.”

The FEIR for the GPF states:

“2.11.2 Threshold of Significance

Significant impacts relative to police services would occur if the future population generated under the proposed plan necessitates an increase in the number of sworn officers (based on planning ratios) which cannot be provided for” (*FEIR, p. 2.11-1, emphasis added*).

In other words, with the increase in population since 2001, and the reduction in sworn officers, a significant adverse impact exists. While a statement of overriding consideration might (mistakenly) be considered a solution, it does not resolve the inconsistency with the General Plan. Furthermore, Figure 3-1 (Attachment D) of the GPF makes it clear that this site is not designated for a Regional Commercial Center.

Failure to provide **adequate** (as defined by the GPF) police service is a **significant adverse impact**. The City does not currently provide adequate police service and is therefore prohibited by Policy 3.3.2, a mandatory mitigation, from approving discretionary increases in density or intensity. The City certified the GPF FEIR, but has not complied with its very clear mandate to safeguard public safety.

The GPF FEIR Statement of Overriding Considerations (Attachment E) shows this policy is a mitigation for police service:

“J. POLICE

1. Impacts

The amount of population. Employment. And housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990).” (WCP, p. III-) [sic]

Based on the planning ratio standard used. To determine the adequacy of the supply of sworn officers, **a total of 17.673 officers would be needed to adequately accommodate the City’s 2010 average day/night population. This is in comparison to the 8,817 sworn officers that were on the force as of 1990.**

“These impacts are potentially significant.” (GPF, SOC, p. 19).

2. Mitigation Measures

*The Framework Element’s economic development policy targets an employment base that exceeds SCAG’s jobs forecast to maintain the City’s 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to **pay for added police protective services. Additionally. The Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services**” (SOC, p. 20, emphasis added).*

In Fix The City’s litigation over the GPF, the City argued that if it lacked the resources to maintain adequate police and fire, it would not approve discretionary increases in density or intensity.

The GPF FEIR Statement of Overriding Considerations makes this clear: “the Framework Element includes a policy that requires the City to correlate the type, amount, and location

of development with the provision of adequate supporting infrastructure and public services” (p. 19).

Response to Comment No. 16-16

With regard to mitigation measures of the General Plan Framework Final EIR, refer to Response to Comment No. 16-5. With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-147, and 35-133.

Comment No. 16-17

All mitigations, including policy mitigation measures, are mandatory, as explained in the Community Plan:

“The quality of life and stability of neighborhoods throughout the West Los Angeles Community critically depends on providing infrastructure resources (i.e., police, fire, water, sewerage, parks, traffic circulation, etc.) commensurate with the needs of its population. If population growth occurs faster than projected and without needed infrastructure improvements to keep pace with that growth, the consequences for livability within the Community could be problematic.

Accordingly, the proposed Plan has three fundamental premises. First, is limiting residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Second, is the monitoring of population growth and infrastructure improvements through the City’s Annual Report on Growth and Infrastructure with a report to the City Planning Commission every five years on the West Los Angeles Community following Plan adoption. Third, if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development. The Community Plan includes appropriate policies and implementation measures generated from the mitigation measures listed in the environmental clearance. In many instances these measures encompass the policies contained in the General Plan Framework Element.” (WLA Community Plan p. III-1, emphasis added).

The Wilshire Community Plan imposes restrictions on discretionary approvals **when critical resources are threatened, such as water supply**, as is the current situation in California and Los Angeles. It is common knowledge that California is in an historic drought. Our water supplies are indeed threatened. We have mandatory watering restrictions, the MWD and Colorado River Authority have recognized the drought and severe reductions in supply. The City is relying upon an outdated DWP water supply plan that fails to acknowledge and act accordingly with the drought, as mandated by the Community Plan.

For example, although the GPF calculated that 17,673 sworn officers were required to provide adequate police service in 2001 (SOC, p. 20), the city has only about 9300 sworn officers. **Therefore, the city is not providing the level of police service considered adequate in the GPF.**

Under GPF Policy 3.3.2 and the WCP, the City is obligated to deny discretionary increases in the intensity or density of projects if police or fire services are inadequate. Findings must be supported by substantial evidence, and not by referencing aspirational plans and monitoring of those plans. Public safety is the first responsibility of local government under the California Constitution. In the approval process for massive projects, it is ignored. One explanation for this willful violation of the GPF and the WCP is that the budget of the Planning Department is funded by planning fees from developers. Another is that new development raises the tax base. The City does not act as an objective evaluator. It has an institutionalized conflict of interest in which public safety is jeopardized in order to keep a bureaucracy funded.

This is a general plan issue, and not the city's CEQA workaround that ignores adequacy and instead focuses only on the CEQA threshold of significance if a new police or fire station is required to be constructed, and ignores the CEQA Checklist for conflicting with adopted plans, policies and regulations adopted to mitigate environmental impacts. That is also a CEQA checklist threshold, but it is ignored by this DEIR, and must be addressed in a Supplemental EIR that provides:

1. The Draft Specific Plan
2. The Draft Development Agreement
3. Analysis of Housing Element impacts removing thousands of units from residential development
4. Substantial evidence on the response times for police and fire in the project area, as well as the number of days the 6 stations in the Wilshire Community Plan are dark. Please utilize the LAFD Dispatch Center maps to identify the staffing and

operation of all six stations, their response times (not average response times) following NFP1710, and address the substantial evidence from LAFD that fire service will be inadequate. Under these circumstances, approval of an increase in density or intensity for the subject property would be in direct violation of the GPF SOC and the Wilshire Community Plan.

Response to Comment No. 16-17

The commenter is referring to text contained within the Land Use Plan Policies and Programs Section of the Wilshire Community Plan (Page III-1) that is specifically applicable to projects situated on parcels designated for residential uses by the Community Plan and/or projects containing residential dwelling units in their scope of work. Therefore, this narrative contained in the Community Plan is not applicable to the Project, as—consistent with the Project Description included in Section II of the Draft EIR—the Project does not contain any residential dwelling units or is located on land designated for residential uses by the Community Plan. In accordance with the CEQA Guidelines, City of Los Angeles CEQA Thresholds Guide, and Policy 8-1.1 of the Wilshire Community Plan, consultation with the LAPD regarding the review of development project and land use changes is required to determine law enforcement needs and requirements. This consultation has been completed, as shown in Appendix L of the Draft EIR. As identified on page 20 in the General Plan Framework Revised Findings and Statement of Overriding Considerations dated July 17, 2001, the City should seek to secure additional resources for funding the enhancement of the number of sworn officers needed. As shown in Section II-4 of the Draft EIR, one objective of the Project is to provide substantial economic opportunities for the City and its residents in the form of tax and property revenue. Approval and buildout of the Project would provide the City enhanced resources to allocate to public safety and other necessary City services.

With regard to the appropriate threshold to use for analyzing potential impacts to fire and police protection, refer to Response to Comment No. 16-6. With regard to the Project's consistency with the relevant objectives and policies of the Wilshire Community Plan, refer to Response to Comment No. 16-7. With regard to mitigation measures of the General Plan Framework Final EIR, refer to Response to Comment No. 16-5. With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-147, and 35-133. Also refer to Response to Comment No. 16-66 regarding the adequacy of water supplies to serve the Project and the consideration of drought conditions, and Response to Comment No. 26-175 regarding the Project's water demand and impact analysis.

Note that the comments regarding the Planning Department do not raise CEQA issues and are not specific to the Project, and no response is required. However, those comments are noted for the administrative record and have been incorporated into this

Final EIR for review and consideration by the decision-makers prior to any action on the Project.

This comment incorrectly asserts that the CEQA checklist item for conflicts with adopted plans, policies and regulations adopted to mitigate environmental impacts was ignored. The Project's impacts related to land use were analyzed in Section IV.H, Land Use and Planning, of the Draft EIR. In accordance with CEQA, the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including the LAMC and the Wilshire Community Plan, among others, as well as the compatibility of the proposed uses with surrounding land uses. CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, CEQA Guidelines Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Per Appendix G of the CEQA Guidelines, a project would have a significant impact related to land use if it would (a) physically divide an established community; or (b) cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As discussed on pages IV.H-38 to IV.H-39 of the Draft EIR, the Project would not physically divide an established community. As discussed on pages IV.H-39 to IV.H-57 and Appendix I of the Draft EIR, which included an analysis of the General Plan Framework Element (including the Land Use Chapter, Open Space and Conservation Chapter, Economic Development Chapter, Transportation Chapter/Mobility Plan 2035, and Infrastructure and Public Services Chapter), General Plan Conservation Element, Wilshire Community Plan, LAMC, Citywide Design Guidelines, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and South Coast Air Quality Management District Air Quality Management Plan, the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the Draft EIR correctly concluded that impacts related to land use would be less than significant.

The comment incorrectly states that a supplemental EIR is required. Under CEQA, a supplemental EIR is only required if one or more of the following events occurs:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.¹²³

However, none of these criteria apply to the Project.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. A draft Specific Plan and Development Agreement are not required to be published for evaluation of the Project. In addition, the Preliminary Draft Specific Plan incorporates the same physical elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR.

The comment regarding housing does not concern the Draft EIR's analysis of environmental impacts. Please note that, as discussed in Response to Comment No. 28-9, the Project would not result in a net downzoning or otherwise reduce housing capacity and population. The proposed Specific Plan would not lessen housing intensity or change other development standards in a way that would individually or cumulatively reduce the Project Site's housing capacity. Further, as the Project does not include a change in use, the Project Site's housing capacity would be the same as existing conditions.

Comment No. 16-18

Inconsistency with plans, policies and regulations adopted to mitigate environmental impacts is a CEQA impact. This project is inconsistent with both the GPF, its SOC, and its NOD indicating that the mitigations (e.g., "Mitigation Through Policy") are mandatory. See GPF FEIR, p. [sic]

For example, regarding transportation, the plan repeats the language of the GPF SOC:

***“Objective 16-2** Ensure that the location, intensity, and timing of development is consistent with the provision of adequate transportation infrastructure.*

¹²³ Public Resources Code Section 21166.

Policies

16-2.1 No increase in density shall be effected by zone change, plan amendment, subdivision, or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations:

The transportation infrastructure serving the project site and surrounding area, presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

Program: *Decision-makers shall adopt findings with regard to infrastructure adequacy as part of their action on discretionary approvals of projects which could result in increased density or intensity” (WCP, p. III-36–37).*

There is no available capacity at the nearby intersections. The finding cannot be made regarding adequate transportation capacity.

There is no analysis, evidence, or reference to the mandatory requirements for discretionary approvals included in the LOD, for the Community Plan or the General Plan Framework. The city’s workaround for a crumbling infrastructure and inadequate public service is to only reference (if at all) the policies which the LOD supports, and never addresses the mandatory findings of adequacy, or direct violation of the Community Plan.

This *cherry-picking* has been called-out by Judge Goodman (Attachment B). Indeed, the City CEQA Thresholds Guide asks “would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project... for the purpose of avoiding or mitigating an environmental effect?” (Thresholds Guide, p. H.1-1). By ignoring the answer(s) to this CEQA question, and cherry-picking, the city is ignoring mitigations is obligated to enforce.

Response to Comment No. 16-18

The Draft EIR addressed transportation in Section IV.K, Transportation, with supporting data in the form of a comprehensive Transportation Assessment approved by LADOT, provided in Appendix M.1 of the Draft EIR. As detailed in Section 2 of the TAG and summarized in Section 4A of the Transportation Assessment, the purpose of the City’s CEQA Threshold T-1—Conflicting with Plans, Programs, Ordinances, or Policies is to assess whether a project would conflict with an adopted transportation-related program, policy, plan, or ordinance that protects the environment. In general, transportation policies

or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Conversely, a project would not result in an impact merely based on whether it would implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City over time, and over a broad area, and it is the intention of Threshold T-1 to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies.

As stated in Section 2.1.4 of the TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be considered consistent. The detailed analysis provided under CEQA Threshold T-1 was completed in accordance with the methodology outlined in Section 2.1.4 and included a review of the documents and ordinances listed in Table 2.1-1 for City plans, policies, programs, ordinances and standards relevant to determining project consistency. Additionally, in accordance with the CEQA Threshold T-1 methodology, Attachment D: Plan Consistency Worksheet was completed for the Project and is provided in Appendix D of the Transportation Assessment.

As stated in Section 2.1.4 of the TAG, a 'yes' or 'no' answer to these questions outlined in the Attachment D: Plan Consistency Worksheet does not automatically determine a conflict. "Rather, as indicated in Attachment D, the Project Applicant must provide substantiating information to help determine whether the proposed project precludes the City's implementation of any adopted policy and/or program that was adopted to protect the environment. A mere conflict with adopted transportation related policies, or standards that requires administrative relief or legislative change does not in itself constitute an impact." Furthermore, as discussed on pages IV-K-65 and IV.K-66 of Section IV.K, Transportation, of the Draft EIR, the Project would not conflict with Objective 16-2 and related Policy 16-2.1 of the Wilshire Community Plan.

The Project would not preclude the City's implementation of any future improvements to the street system or infrastructure, and the Draft EIR provided substantiating information that adequately addresses the CEQA Threshold T-1 in accordance with the methodology outlined in the TAG.

Furthermore, the Transportation Assessment provided a detailed non-CEQA operational LOS analysis of the surrounding street system in accordance with the methodology and guidelines outlined in the TAG. As stated in LADOT's Assessment Letter provided in Appendix M.2 of the Draft EIR, LADOT has reviewed the non-CEQA operational evaluation and determined it adequately discloses operational effects.

As discussed in Response to Comment No. 26-22, the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations in accordance with

Appendix G of the CEQA Guidelines in Section IV.H, Land Use and Planning, of the Draft EIR. As discussed on pages IV.H-39 to IV.H-57 and Appendix I of the Draft EIR, the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the Draft EIR correctly concluded that impacts related to land use would be less than significant.

Comment No. 16-19

For example, Objective 8 of the Community Plan clearly states: “To provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands” (p. III-16).

Adequacy is not just for facilities, but for personnel. GPF FEIR provides standards for adequacy:

“The City’s law enforcement personnel need is based on standards established by the International Association of Chiefs of Police which are used by the LAPD to determine staffing needs. The standards are based on the amount of population needed to support these personnel. As indicated in Table P-2, the national standard is four sworn police officers per 1000 residents (4:1000) and the local standard for non-sworn support personnel is one per 1000 residents (1:1000)” (GPF FEIR, p. 2.11-1).

We have a population of about 4 million residents. According to the 2001 GPF, we should have a police force of about 17,673 sworn officers. We have fewer than 9,300 according to newspaper articles. Therefore, the amount of police personnel is inadequate. The city is failing to enforce the community plan’s requirement that if funding is not available within twelve months, ICOs and downzoning will be required. At a minimum, no discretionary increases would be permitted.

The GPF Statement of Overriding Considerations and Mitigations for Police state clearly on pp. 19-20 (Attachment E):

“J. POLICE

1. Impacts

The amount of population. employment. and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990). Based on the planning ratio standard used. to determine the

adequacy of the supply of sworn officers, a total of 17,673 officers would be needed to adequately accommodate the City's 2010 average day/night population. This is in comparison to the 8,817 sworn officers that were on the force as of 1990.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will [sic] provide additional revenue necessary to pay for added police protective services. Additionally, the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services. In addition to the Framework Plan, other mitigation measures include:

- *Planning Standards indicating the most appropriate number of sworn police officers for [sic] implementing police services shall be established.*
- *The existing number of sworn police officer shall be enhanced by meet the established planning standards."*

LAPD and LAFD are below the level of staffing required to adequately serve the project area, according to the Statement of Overriding Considerations for the GPF.

The DWP supply plan is contradicted by MWD and the Colorado River Authority's drought regulations. California has ordered water cutbacks. Under these circumstances, the WLA Community Plan states (as of 1999). The DCP has never provided the data to determine whether infrastructure and public services are adequate. Instead, it cites plans and says that they are constantly monitoring and updating those plans. But plans do not answer the question of whether infrastructure and public services, particularly police and fire, are adequate.

To determine adequacy requires a definition, a benchmark, a standard, whether adopted or not. Otherwise, statements by city departments that infrastructure and city services are adequate to serve current and added demand are speculative and not based on substantial evidence. In fact, the Fire Department has stated on the record, before the City Council

and the Fire Commission, that NFPA 1710 is used as the benchmark to determine adequacy.

And this is repeated in various third-party studies commissioned by the City, by the LA County Grand Jury, and by the LA City Controller (Attachment I). In the absence of this performance metric, any determination of adequacy would be arbitrary and capricious and not supported by substantial evidence.

a. City CEQA Thresholds Guide Cumulative Impacts (Police, K.1), p. K.1-3:

“Cumulative Impacts

Identify the related projects, which would be served by the same LAPD facilities as the proposed project. Consider the characteristics of the related projects in terms of size, location, and types of land uses. Determine the net population increase resulting from the related projects. Based on consultation with LAPD, evaluate the cumulative demand for police services anticipated at the time of project buildout compared to the expected level of service available.”

b. City CEQA Thresholds Guide (Fire), p.K.2):

“Are there any street intersections with a level of service (LOS) of E or F near the project site that would adversely impact response time?”

“A ‘yes’ response to any of the preceding questions indicates further study in an expanded initial study, negative declaration mitigated negative declaration, or EIR may be required. Refer to the Significance Threshold for Fire Protection and Emergency Medical Services, and review the associated Methodology to Determine Significance, as appropriate.”

“In a description of the environmental setting, include the following information:

- *Description including response distances) and map of LAFD facilities that serve the project (for assistance, see Exhibit K.2-1). Identify intersections at LOS E or F that provide access to the project.” (p. K.2-4).*
- *No map was provided with LOS between Station 92 and the project site.*

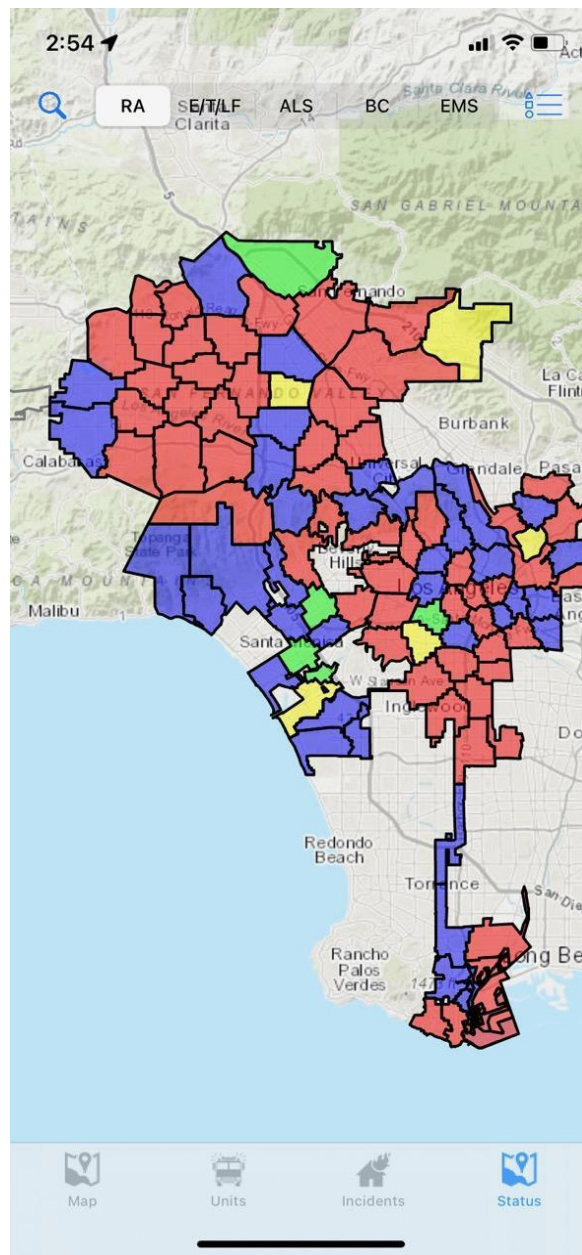
c. “Cumulative Impacts

“Based on consultation with LAFD’s Construction Services Unit, determine the cumulative effect on fire protection and emergency medical services.” (K.2-4)

It is imperative that any analysis factors in the routine closure of stations due to personnel shortages. At any time, about 50 stations are dark. On the next page is a dispatch map from LAFD. Most is red. The city, including the

project area, are not adequately served due to personnel shortages and sometimes, equipment shortages or failures. As shown on the map (next page), **Emergency Medical Services are not available in many parts of the city and are shown as red. This includes the project site.**

- Red: 0 Rescue Ambulance available
- Yellow: RAE Rescue EMT available only
- Blue: RAP Paramedic (higher level of care) available only
- Green: RAP + RAE or RAP < More than one available



Since about 85% of LAFD calls are for medical emergencies, ***this is not just inadequate, it is failure***, despite the heroic efforts of our first responders. *Over time, the response times have deteriorated* (e.g., the average response times reported in the annual LAFD Strategic Plan).

Response to Comment No. 16-19

This comment is substantially similar to the preceding comments made by the commenter. Regarding Objective 8 of the Wilshire Community Plan, refer to Response to Comment No. 16-7. With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-172, and 35-133. With regard to LAFD emergency response times and LOS, refer to Response to Comment No. 9-35 and Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion. The materials submitted by the commenter are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed above, many of these materials were prepared in the 1990s and do not reflect the latest criteria and data used by LAPD to determine impacts of a development project. Also note that the Department of City Planning uses Appendix G of the CEQA Guidelines as its thresholds of significance. The *2006 L.A. CEQA Thresholds Guide* is used, as appropriate, to assist in answering the Appendix G threshold questions. The analysis of fire and police protection includes a detailed discussion of Project and cumulative impacts in consultation with LAFD and LAPD.

Comment No. 16-20

The systemic failure is compounded by traffic congestion, which further slows responders. The Community Plan states as of 1999, "Severe traffic congestion along major transportation corridors and intersections with most streets functioning at full capacity." (p. I-4). Ignoring congestion, incremental increases in density, a failure to consider cumulative impacts of density bonus and TOC projects, have all combined to create gridlock. While the City's response has been that state law requires drivers to move to the right-hand lane, during gridlock, this is not an option. Changing signal lights to proceed through an intersection does not work if the traffic beyond the intersection is also at a standstill. It is for this reason that the City's CEQA Threshold Guide instructs environmental assessments to show LOS E or F on the access route to a project site (p. K.2-4).

This means that rescue EMTs and rescue Paramedics must come from further away and take more time. For cardiac cases, each minute of delay increases mortality rates. Each floor above the third floor also delays response time.

Fix The City incorporates by reference all testimony and documents submitted to the City for this case file.

Response to Comment No. 16-20

This comment discusses topics that are not specific to the Project. With regard to LAFD emergency response times and LOS, refer to Response to Comment No. 9-35 and Section B, Level of Service, and Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion.

With regard to cumulative traffic impacts and level of service, pursuant to SB 743, the City no longer evaluates transportation impacts using vehicle delay or LOS. Rather, the focus of traffic analysis is related to VMT. Refer to Section III, Environmental Setting, of the Draft EIR for the comprehensive list of related projects that was used to evaluate cumulative impacts of the Project.

Comment No. 16-21

CBS DEIR NOTES

This EIR claims to analyze the environmental impacts of an undisclosed, invisible specific plan. For the city to accept such an EIR is a grave violation of CEQA in the absence of the actual specific plan and development agreement. **The entire EIR is speculative and not based on substantial evidence.** For example, there is no evidence that any new studio space will be built or remodeled.

Requires a variance to measure height differently from LAMC 12.21.1. (see IV.H-19, IV.H-25)

Requires a variance to redefine Floor Area (IV.HY-21, Footnote 14).

Response to Comment No. 16-21

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the physical aspects of the proposed Specific Plan were fully described and evaluated in the Draft EIR and how the Draft EIR was completed in full compliance with CEQA. Neither CEQA nor City policy requires the Specific Plan or the Development Agreement to be included in the EIR. Nevertheless, in response to comments on the Draft EIR and for informational purposes, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website and a draft Development Agreement will be publicly available prior to the public hearings for the Project.

With regard to the underlying purpose of the Project to maintain the Project Site as a studio, refer to Response to Comment No. 5-15. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the proposed studio uses.

Section 12.27 of the LAMC allows projects subject to the regulations of the LAMC to seek relief from those LAMC regulations through the submission of an application for a Zone Variance. The Project would include the creation of a specific plan, which is a land use ordinance enacted by the City Council superseding standard LAMC regulations. Citywide, specific plans and other overlays are commonly used to prescribe height and floor area limitations differing from standard LAMC provisions. The proposed Specific Plan would regulate height and floor area. Thus, variances are not required.

Comment No. 16-22

Can the Development Agreement be extended beyond 20 years? (IV.H-22).

Response to Comment No. 16-22

Any extension of the Development Agreement beyond 20 years would require additional environmental review pursuant to CEQA. This comment does not concern the environmental impact analysis in the Draft EIR. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration prior to any action on the Project.

Comment No. 16-23

Show where off-site parking would be provided in order to analyze traffic impacts (see IV.H-29). Will they be within 700 feet of the project site? Requires the distance from site to be disclosed. Will it create neighborhood intrusion impacts? At what hours would the off-site lots be used? Would code-required parking be located off-site?

Response to Comment No. 16-23

Refer to Section B, Off-Site Parking, of Topical Response No. 13, Parking, and Response to Comment No. 16-13. As discussed therein, the Project no longer proposes off-site parking, and as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 16-24

Special Events are left undefined, no limitation on how many and how often and hours of events. The impacts of special events are too vague to measure and evaluate. (IV.H-23)

Response to Comment No. 16-24

Refer to Topical Response No. 3, Permitted On-Site Uses, regarding how special events would continue to be governed by the LAMC, consistent with existing conditions.

Comment No. 16-25

CUP for restaurants and sale of alcohol not defined. Is there an application (Ibid.) What is the reason to sell alcohol off-site?

Response to Comment No. 16-25

Alcohol sales are discussed on page IV.H-30 in Section IV.H, Land Use and Planning, of the Draft EIR. The alcohol regulations are included in the Preliminary Draft Specific Plan and are consistent with the City's existing regulatory requirements.

Comment No. 16-26

What is the total occupancy for the site and during what hours?

Response to Comment No. 16-26

The studio would continue to be operated on a 24-hour basis, seven days a week, consistent with existing operations. Occupancy for each of the on-site buildings will be determined by the LAMC in coordination with LAFD. As stated throughout the Draft EIR, it is expected that the Project would generate a net increase of approximately 5,702 employees on-site.

Comment No. 16-27

What is the basis for the sign district externally visible? Will it be for on-site tenants, digital, current productions, etc.?

Response to Comment No. 16-27

The Sign District will allow on-site signage, and off-site signage will be prohibited. The signage within the Sign District will be utilized by on-site tenants and by current productions. No digital signage will be allowed along the perimeter of the Project Site.

Comment No. 16-28

Stormwater: p. IV.H-42: what about discharge of ongoing groundwater pumping due to high water table? What is the quality of the groundwater? Is it potable? Does it have hydrocarbons?

Subsidence from operational groundwater pumping? Has this been analyzed (p. IV-H.42) No discussion of operational groundwater pumping. Is it suitable for irrigation? Need analysis of groundwater quality.

Response to Comment No. 16-28

As discussed in the Response to Comment No. 3-7, no operational groundwater pumping is proposed. The Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment Nos. 11-5 and 26-53 through 26-71 regarding dewatering. Refer to Response to Comment Nos. 11-25, 16-74, and 16-85 regarding subsidence.

The groundwater quality found at the Project Site has been sampled, tested, and reported in the Site Summary Report (Appendix G.1 of the Draft EIR) and various monitoring reports for the former Texaco station that was located within the Project Site boundary (see Geotracker database). In general, the groundwater quality at the Project Site is variable. For example, low concentrations of residual hydrocarbons from the former Texaco station were detected in the groundwater in the northeast corner of the Project Site. As discussed on page IV.F-24 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the former Texaco station contained one 10,000-gallon and three 12,000-gallon USTs which, along with dispensers, associated piping, and pump islands, were removed during station demolition in 1991. According to the LUST database, a gasoline release was discovered by Texaco in December 1990. Remedial activities were performed at the former station from 1996 to 2012 and included soil vapor extraction, dual phase extraction, air sparging, and groundwater monitoring. During the final sampling event at the former Texaco station in January 2012, maximum groundwater concentrations were 8,800 micrograms per liter (µg/L) for total petroleum hydrocarbons in the gasoline range (TPH GRO), 1,600 µg/L for benzene, 38 µg/L for methyl tert-butyl ether (MTBE), and 13 µg/L for tertiary butyl alcohol (TBA). A soil vapor investigation and health risk assessment were conducted to assess vapor intrusion from petroleum products in groundwater. Since the area of the former Texaco station was used for parking at the time of the investigation, Texaco's environmental consultant, Arcadis, concluded that adverse health effects were not expected. Based on this data, the LARWQCB issued a No Further Action letter on November 29, 2012. The LARWQCB Closure Package for the former Texaco station includes detailed information on soil, soil vapor, and groundwater investigations associated with remediation of TPH, benzene, MTBE, and other constituents that were known to

remain in the subsurface in the northeast portion of the Project Site. Because that area of the Project Site was used for commercial parking at the time, the Phase I concluded that the former Texaco station is a Controlled Recognized Environmental Condition (CREC).

Environmental investigations were recently performed by Geosyntec to confirm the extent of these remaining constituents, as detailed in the Site Summary Report and mapped in Figure 2 therein. Elevated concentrations of fuel-related constituents were detected in soil and groundwater downgradient of the former Texaco station. As stated on page 12 of the Site Summary Report, TPH detected in soil samples are mostly below regulatory screening levels. TPH diesel range organics (DRO) and TPH motor oil range organics (ORO) screening level (SL) exceedances in soil appear to be sporadic and confined to shallow soil. Specific areas with elevated TPH that will require appropriate management during excavation and grading operations are shown on Figure 3 and discussed in the Soil Management Plan (Appendix B of the Site Summary Report).

Thus, any residual concentrations would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1. Specific areas with elevated TPH and one location with elevated arsenic also would require appropriate management during excavation and grading operations. Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control. Per Mitigation Measure HAZ-MM-1, the Project's Soil Management Plan would require that special precautions be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above SLs. These areas include the former Texaco station and other select areas of the Project Site with elevated TPH and arsenic in shallow soil, as shown in the Site Summary Report. Soil in these areas of the Project Site with residual COCs above SLs shall either be excavated prior to commencing excavation and grading operations in these areas or segregated and stockpiled prior to off-site disposal.

As discussed in Response to Comment No. 13-6, the Project's installation of a methane mitigation system will address potential vapor intrusion from residual fuel hydrocarbons from the former Texaco station, and naturally occurring hydrogen sulfide.

Off-site discharge of groundwater from the temporary construction dewatering will be conducted in accordance with the discharge permit obtained and all applicable regulatory requirements. There are no plans to use the pumped groundwater for Project Site potable water uses, irrigation uses, or any other uses. Depending on the most appropriate discharge point, the permit will be an NPDES permit issued by the LARWQCB or an industrial sewer discharge permit issued by the City of Los Angeles.

Comment No. 16-29

Tract Map: check if findings can be made and if findings under Wilshire Plan can be made. **The term of the tract map is less than 20 years.** This makes no sense. See IV.H38.

Response to Comment No. 16-29

The Project includes a proposed Vesting Tentative Tract Map (VTTM), which was submitted concurrent with the other entitlements. Findings for approval will be required by the Advisory Agency, but such findings are not a CEQA issue to be analyzed in the EIR. The Project also includes a proposed Development Agreement for a term of 20 years, which, if approved by the City Council, would vest the tentative map approval for that duration.

Comment No. 16-30

Sidewalks are required to be 15-feet along the boulevards per MP 2035. Therefore Footnote 21's (IV.H-32) statement that because the roadway widens, the sidewalks will narrow disregards the required 15-feet can be met by dedicating 3 feet of the project side to provide required 15-foot sidewalks. Otherwise, the sidewalks do not comply with the MP 2035 required public sidewalk dimensions. This is particularly important to safeguard pedestrian safety due to crowding to enter the project site for special events or perhaps to purchase alcohol.

Response to Comment No. 16-30

Correspondence provided by BOE dated July 14, 2021 (refer to Appendix FEIR-23) identifies that the only element of the Beverly Boulevard right-of-way (other than standard repair and reconstruction language) that needs dedication is a 20-foot radius return at the property line at the intersection of Beverly Boulevard and Fairfax Avenue. Additionally, irrespective of this correspondence, Appendix F of the Mobility Plan identifies Beverly Boulevard (between La Cienega Boulevard and Western Avenue) to have a modified street designation. The language includes the following: "No widening in excess of the existing roadway (Wilshire Plan)." Additionally, the Wilshire Community Plan is consistent with this statement as Beverly Boulevard is listed under streets that were reclassified with alternate standards. The Wilshire Community Plan states, "No widening of roadway west of Western Avenue" (see page III-23). Beverly Boulevard varies in width between La Cienega Boulevard and Western Avenue, and the Modified Avenue I designation applies to that entire stretch of the street.

To clarify for the commenter, the Fairfax Avenue right-of-way will be modified because the right-of-way exceeds the standard required by the Mobility Plan. The sidewalk along Fairfax Avenue will be provided within the public right-of-way and via an easement

within the Project Site. The combined width of those areas will provide for a 15-foot sidewalk.

Refer to Response to Comment Nos. 16-72 and 16-76 regarding sidewalk widths and consistency with the Mobility Plan.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety and access.

Comment No. 16-31

Wilshire Plan: EIR claims **adequate police facilities, personnel, and protection** (p. IV.H-44). Where is the substantial evidence? GPF states that 17,673 sworn police officers are required to provide adequate service—and that was in 2000. Present personnel are around 9300. How is this adequate? Please define adequate.

Response to Comment No. 16-31

Refer to Response to Comment No. 16-5 regarding the adequacy of police protection services as determined by LAPD. Substantial evidence for LAPD's determination is provided in Section IV.J.2, Public Services—Police Protection, and Appendix L of the Draft EIR, which includes the LAPD response letter. On page 10, the letter concludes that the Project will not result in the need for new or altered police facilities.

Also refer to Response to Comment No. 16-7 regarding consistency of the Project with the objectives and policies set forth by the Wilshire Community Plan, including those related to police protection services.

In response to how the current citywide number of sworn police officers is adequate, as discussed on page IV.J.2-11 of the Draft EIR, the need for or deficiency in adequate police protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment resulting from that separate project, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. For the reasons given in the sources above and Response to Comment No. 16-5, the Project would not create a significant impact on police protection services. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-32

Multiple driveways will create congestion, inadequate queuing capacity and pedestrian hazards. (p. IV.H-44).

Response to Comment No. 16-32

Refer to Response to Comment No. 16-11 and Sections A, Queuing at Project Driveways; B, Level of Service; and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding queuing capacity, the number and location of the proposed driveways at the Project Site, pedestrian safety at those driveways and traffic hazards. As discussed therein, adequate queueing capacity is provided, and driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety.

Comment No. 16-33

Also, no other Regional Center has an FAR 1.5:1 or 1.75:1. Designation as a Regional Center is not supported by the GPF Figure 3-1, nor the Community Plan. The regional center designation appears to be a trojan horse to upzone subsequently, since Regional Center FARs are often a minimum of 6:1 FAR. There is no disclosure of why a Regional Center is required for this project.

Response to Comment No. 16-33

Chapter 3 of the Framework Element of the General Plan identifies that land designated as Regional Commercial is characterized by development that is built to an intensity of an FAR between 1.5 to 6.0. As the Specific Plan would allow a FAR of 1.75, the Project is consistent with the development that the Framework Element of the General Plan envisions for Regional Commercial. Refer to Response to Comment No. 5-8 for further information regarding the proposed Regional Commercial land use designation.

Comment No. 16-34

The project proposes to remove all potential residential development from this site and is [sic] therefore **is inconsistent with the Housing Element and violates LAMC 11.5.8.**

Response to Comment No. 16-34

Refer to Response to Comment No. 16-2 regarding how the Project would not conflict with the Housing Element. Because the Project does not involve a change in the number of residential dwelling units permissible under the Project Site's zone classification, it does not violate Section 11.5.8 of the LAMC.

Comment No. 16-35

“The City of Los Angeles has the responsibility to maintain and implement the City’s General Plan” (Wilshire Plan, p. II-5). Instead of implementing the plan, it amends it to exceed the carrying capacity of the city for traffic, air quality, public safety services, water supply, etc. CEQA allows the city to approve projects that have unmitigable impacts through statements of overriding considerations. But it is not permitted to violated [sic] the General Plan, Community Plan, and Specific Plans. This EIR once again ignores the guardrails adopted by prior city councils to maintain public safety and public health. Air quality deteriorates as evidenced by more inhalers seen at AYSO soccer games.

Response to Comment No. 16-35

Refer to Response to Comment Nos. 5-8 and 11-29 regarding how the proposed General Plan Amendment does not, in and of itself, increase density and, thereby, does not result in significant impacts. Also refer to pages IV.H-39 through IV.H-44 of Section IV.H, Land Use and Planning, of the Draft EIR, and pages 1 through 25 of Appendix I, Land Use Plans Consistency Analysis Tables, to the Draft EIR, for a discussion of the Project’s overall consistency with the goals and policies of the General Plan Framework Element, Wilshire Community Plan, and other applicable plans.

Regarding air quality, as stated on pages IV.A-59, IV.A-66, IV.A-73, and IV.A-75 through IV.A-77 of the Draft EIR, air quality impacts would be less than significant for all criteria pollutants after the application of mitigation, except for regional construction NOx emissions, and regional overlapping construction plus operational VOC and NOx emissions during the long-term buildout scenario. However, construction and operational localized air quality impacts would be less than SCAQMD’s significance criteria for all pollutants (see Tables IV.A-10 and IV.A-11 of the Draft EIR). Additionally, a quantitative HRA, which includes an analysis of carcinogenic and non-cancer risks (such as respiratory issues), was developed in response to SCAQMD comment on the Draft EIR and is included in Appendix FEIR-10 of this Final EIR. As discussed on pages IV.A-72 and IV.A-73 of the Draft EIR, and further confirmed by the results of the HRA, the Project would not generate substantial toxic air contaminant (TAC) emissions or result in significant contributions to human health hazards in the Project area.

Refer to Topical Response No. 10, Trip Generation, regarding the trips generated by the Project and Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the Project’s NTMP. Also refer to Response to Comment No. 16-66 regarding the Project’s less-than-significant impacts associated with water supply and Response to Comment No. 16-5 regarding the Project’s less-than-significant impacts associated with public safety.

Comment No. 16-36

While the State has adopted **VM**T to measure traffic impacts, the **Wilshire Community Plan requires measurement of congestion**, which creates additional pollution, and it defines adequate traffic capacity (. [sic] The Plan has specific thresholds to measure adequate traffic flow. For those of us who live here and attempt to drive, LOS tells you how slow traffic will be, and defines adequate capacity as better than LOS E or F. The intersections surrounding the project site are already failing. Unless or until they can be improved, the Wilshire Plan prohibits making it worse. Violation of the Wilshire Community plan cannot be lawfully ignored through a statement of overriding consideration.

GPF 3.3.2 and Wilshire Plan both state that if resources are not available to remedy infrastructure and emergency services to become adequate, then density and intensity cannot be increased, and in fact, may require downzoning. This city has reached the point where it cannot afford to fix its deteriorating services and resources and must therefore only allow by-right development.

Response to Comment No. 16-36

The Draft EIR analyzed the Project's potential transportation impacts in Section IV.K, Transportation, which was based on a comprehensive Transportation Assessment (Appendix M.1 of the Draft EIR) that was approved by LADOT. As discussed in Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, Section 5B of the Transportation Assessment provided a detailed non-CEQA operational LOS analysis of the surrounding street system in accordance with the methodology and guidelines outlined in the TAG, as well as vehicular queuing within the Study Area during the commuter peak hours under both the existing and future intersection conditions. As shown in Table 18 of the Transportation Assessment, in year 2026 upon anticipated Project completion, several intersections on arterial streets would operate at LOS E or F, before and after the addition of Project trips. The Project would not cause any location to change from LOS D or better to LOS E or F during either peak hour. Nonetheless, the Project would implement a comprehensive TDM Program that would encourage visitors and employees to reduce vehicular trips on the adjacent streets during the peak hours by promoting carpooling and non-auto travel. Although Project trips would be further reduced with implementation of the TDM Program, no additional trip reductions were assumed in the operational LOS evaluation. As stated in LADOT's Assessment Letter provided in Appendix M.2 of the Draft EIR, LADOT has reviewed the non-CEQA operational evaluation and determined it adequately discloses operational effects. Thus, the Draft EIR and Transportation Assessment fully evaluated and disclosed the operating conditions of the street system in accordance with the City's guidelines.

With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-147, and 35-133.

Comment No. 16-37

p. IV-4 claims that the GPF densities include reductions in VMT. This is not accurate. VMT is a recent measurement that reflects the city's failure to achieve congestion reduction and therefore to *ignore congestion entirely*. But the *GPF was based on reducing congestion and improving air quality*. The **claim that VMT leads to greater service levels within infrastructure has no basis**.

Response to Comment No. 16-37

The comment incorrectly correlates reductions in VMT with reductions in congestion. The Draft EIR does not claim that VMT leads to greater service levels or reduced congestion. As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Page IV.H-4 of the Draft EIR summarizes the General Plan Framework Element in stating, "the establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to, reductions in VMT." The reduction in VMT is part of General Plan Framework Element Objective 3.2: "Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution." Additionally, while it is true that the General Plan Framework Element expresses concern about increasing congestion and deteriorating air quality in Chapter 3, the focus of the concern is on low-density development and the long-distance regional travel that it causes, rather than localized congestion in high-density areas.

Comment No. 16-38

The evidence provided by Fix The City, using City data, 26,000 pages (Attachment J) shows that infrastructure is inadequate and deteriorating, and that the costs of delayed repairs make adequacy even more expensive... perhaps beyond reach. Water, power, sidewalks, roads are in disrepair.

The Planning Department, knowing this, ignores the evidence in its own files, and says yes to any applicant who walks in the door, partially to increase the tax base of the city, but perhaps most significantly, to fund the budget of the Planning Department through planning approval fees. Although an EIR is required to be objective, the Planning Department's own survival makes it biased, in violation of CEQA. The Planning Department is like the orchestra on the Titanic to slow down the rush to lifeboats. It has failed to safeguard public

safety, which the California Constitution declares is the first responsibility of local government.

Response to Comment No. 16-38

With regard to the adequacy of fire protection and police protection services and infrastructure as determined by LAFD and LAPD, refer to Response to Comment Nos. 9-35, 16-5, 16-10, 26-147, and 35-133. The attachments submitted by the commenter are not specific to the Project. Specifically, as discussed in Response to Comment No. 16-10, above, Attachment J to this comment letter includes letters addressing other projects in the City, and documents that address the infrastructure status of parks, sidewalks, and water pipes Citywide, many of which are outdated. These attachments are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comments regarding the Planning Department do not raise any issues regarding CEQA, and no response is required.

Comment No. 16-39

Federal Clean Air Act violations. The GPF committed to improving, not degrading air quality. Certification of that FEIR in 2001 by the City Council specifically agreed to comply with the Implementation Plan. Worsening air quality indicates that the City has incrementally violated the implementation plan. **All it does is optimize the profit for a speculative development, further imperiling public health and safety.**

Response to Comment No. 16-39

As discussed above in Response to Comment No. 16-12, the Project is not expected to worsen air quality in the region as construction and operational localized air quality impacts would be less than SCAQMD's significance criteria for all pollutants. SCAQMD's localized significance thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-40

CEQA requires that the curtain be pulled so both the public and the city can evaluate the impacts of the project. Lacking the Specific Plan is a fatal flaw of this EIR. Please prepare a **supplemental EIR** of the Specific Plan, sign district and Regional Center and the helipad

location, elevation, hazards to pedestrians posed by multiple additional driveways, flight path and impact on the Cedars emergency helicopter operations.

Response to Comment No. 16-40

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 5-10 regarding how the physical components of the proposed Specific Plan and Sign District were fully evaluated in the Draft EIR and their availability for public review. Refer to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial land use designation. Refer to Response to Comment No. 26-15 regarding the on-site helipad that would continue to operate as part of the Project consistent with existing conditions in accordance with established permits (ZA Case No. 11412) and regulatory requirements. The only change to the helipad would be its location at a higher level. As such, as discussed in Response to Comment No. 16-87, noise levels associated with continued operation of the helipad would decrease, and no other impacts would occur. Refer to Response to Comment No. 16-87 regarding how continued use of the helipad would not affect the Cedars-Sinai helicopter operations. With regard to pedestrian safety, refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3. Refer to Response to Comment No. 9-29 regarding traffic hazards.

This comment does not provide substantial evidence to demonstrate that a supplemental EIR is required per Public Resources Code Section 21166 or CEQA Guidelines Section 15163. Accordingly, a supplemental EIR is not required.

Comment No. 16-41

While CEQA permits the city to adopt a statement of overriding considerations for impacts that cannot be feasibly mitigated, **state law does not permit the city to approve an amendment to the general plan that is inconsistent with the General Plan elements**, including the General Plan Framework and Mandatory Policy 3.3.2.

Response to Comment No. 16-41

A detailed analysis of the Project's consistency with the City's General Plan, including the General Plan Framework Element, is presented on pages IV.H-39 through IV.H-44 of Section IV.H, Land Use and Planning, of the Draft EIR, and on pages 1 to 25 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. As demonstrated therein, the Project would not conflict with the applicable goals, objectives, or policies of the General Plan. With regard to General Plan Framework Policy 3.3.2, refer to

Response to Comment No. 16-6. Also refer to Response to Comment No. 16-5 regarding the Project's less-than-significant impacts associated with public services.

Comment No. 16-42

IV.H: purpose is to analyze compliance with mandatory mitigation measures (IV-H.2). However, this project fails to analyze **Mandatory Mitigation Policy 3.3.2** of the General Plan Framework, adopted in the certification of the GPF FEIR, as discussed above.

Response to Comment No. 16-42

With regard to mitigation measures of the General Plan Framework Final EIR, refer to Response to Comment Nos. 16-5 and 16-6.

Comment No. 16-43

The GPF does not direct high density/regional centers to Beverly Boulevard or Fairfax. It directs regional centers to Wilshire Boulevard. Figure 3-1 "Long Range Land Use Diagram, Metro." This diagram shows clearly that the GPF designates Beverly Boulevard for neighborhood-serving commercial use, and not a regional center. The proposed project conflicts with the GPF designations for the project site. Changing the designation to Regional Center would constitute spot zoning for a spec [sic] developer who does not even present the specific plan.

Response to Comment No. 16-43

As discussed in Section II, Project Description, of the Draft EIR, the Project is requesting a General Plan Amendment to unify the various existing land use designations to "Regional Commercial." The request requires the City Planning Commission and City Council to find that the General Plan Amendment is in accordance with the public necessity, convenience, general welfare, and good zoning practice. Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the appropriateness of the Regional Commercial land use designation and how the proposed General Plan Amendment does not constitute "spot zoning." Refer to Response to Comment No. 16-41 regarding how the Project would not conflict with the applicable goals, objectives, or policies of the General Plan.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, neither CEQA nor City policy requires a Specific Plan to be included in the EIR.

Comment No. 16-44

Since there is no draft Specific Plan, and this EIR claims to analyze the impacts of the **invisible specific plan**, all analysis is speculative and not supported by substantial evidence, in violation of CEQA.

Response to Comment No. 16-44

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the physical aspects of the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR and how a Specific Plan was not required to be included as part of the Draft or Final EIR.

Comment No. 16-45

Regional Center Designation provides a minimum of HD2 (6:1 FAR) and not 1.75:1 FAR proposed for the invisible specific plan. If the applicant sought only an increase from 1.5:1 FAR to 1.75:1 FAR, a HD amendment would suffice. Instead, the Regional Center appears to be a trojan horse for a much larger project that would also have a sign district. Sign districts like the one for the Motion Picture Museum address the public right of way, not internal signs. Without a specific plan, it is impossible to determine where signs will be, whether they will be digital, etc.

Response to Comment No. 16-45

The comment regarding the Regional Commercial land use designation is similar to Comment No. 16-4. Refer to Response to Comment No. 16-4 for further discussion of the Regional Commercial land use designation. Table 3-6 included in Chapter 3 of the Framework Element of the General Plan identifies the CR, C1.5, C4, and [Q]C2 Zones as corresponding to the Regional Commercial designation but does not identify corresponding height districts. Similarly, the Wilshire Community Plan's General Plan Land Use Map identifies the CR, C1.5, C2, C4, P, PB, RAS3, RAS4, R3, R4, and R5 Zones as corresponding to the Regional Commercial designation, and only identifies a corresponding Height District of 2 to a single parcel located in Koreatown but is otherwise silent on corresponding height districts.

Refer to Response to Comment Nos. 5-8 and 11-29 for further information regarding the proposed Regional Commercial land use designation. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how CEQA and City policy do not require a Preliminary Draft Specific Plan or draft Specific Plan to be included in the EIR. Refer also to Response to Comment Nos. 5-10 and 9-26 regarding how the components of the proposed Sign District were adequately described in the Draft EIR and how digital signage would not be allowed along the perimeter of the Project Site.

Comment No. 16-46

Project conflicts with GPF Policy 5.5 because it does not improve the quality of the public realm. It degrades it by increasing congestion, pedestrian hazards, and creating additional demand for city services which are now threatened, e.g., water supply. **[Evidence of the threat to adequate water supply is mandatory watering regulations and a declaration by the Governor, statements by MWD and by the Colorado River Authority.]**

Response to Comment No. 16-46

As discussed in detail on page 8 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would not conflict with Objective 5.5 of the General Plan Framework Element regarding upgrading and improving the quality of the public realm. As discussed therein, the Project would improve the quality of the public realm through streetscape improvements to the pedestrian experience, while continuing to provide for the unique security needs of a working production studio, by providing new open space and landscaping along the Project Site boundaries. Refer to Response to Comment No. 16-72 regarding the Project's pedestrian-oriented design and public realm improvements.

Regarding congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding pedestrian hazards, refer to Sections C, Traffic Safety vs. Congestion, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3 regarding pedestrian safety.

With respect to water supply, as discussed on page IV.M.1-34 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, LADWP has concluded that adequate water supplies would be able to accommodate the Project, and impacts would be less than significant.

Comment No. 16-47

GPF 6.3.3 conflict and misrepresentation. No public open space is created. There may be open space, but it is private property. Therefore, the statement lacks substantial evidence to support the conclusion. Appendix A, p. 9.

GPF 6.4.8: there is no public open space. False statement. It is a closed, private campus. Appendix A, p. 10.

GPF Objective 7.2: project does not meet the needs of local residents because it does not address homelessness and crime. App. A, p. 11

Response to Comment No. 16-47

The General Plan Framework policies and objective referred to in this comment read as follows:

- **Policy 6.3.3.** Utilize development standards to promote development of public open space that is visible, thereby helping to keep such spaces and facilities as safe as possible.
- **Policy 6.4.8:** Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
 - a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.
 - b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of “unbuildable” areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.
- **Objective 7.2:** Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.

As demonstrated on pages 9 to 11 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would not conflict with General Plan Framework Policy 6.3.3, Policy 6.4.8, or Objective 7. The Project would include development standards for certain open space components, including the proposed frontage areas around the Project Site perimeter. In particular, a minimum of approximately 28,900 square feet of open space would be provided along the Project Site boundaries, as shown in Figure II-6 in Section II, Project Description, of the Draft EIR. These perimeter areas would include landscaping, such as street trees and shrubs, lighting, wayfinding signage, and pedestrian amenities, such as benches and shade

structures. Along all street frontages, pedestrian access and safety would be improved, and bus stops and street lighting would be maintained. The proposed landscape and sidewalk improvements around the Project Site perimeter would improve pedestrian safety and comfort; incorporate visual screening and fencing within a softened, landscaped edge condition; incorporate berms to conceal partially subterranean parking areas; contribute to improved street identities; and highlight the main pedestrian studio entrance on Beverly Boulevard.

While not all of the open space along the Project Site frontages would be publicly accessible, open space would be visible along the street frontages, and specific pedestrian improvements would be located within and along the public right-of-way. As such, the Project would result in enhanced street frontages that promote safety and enhance the public realm. Refer also to Response to Comment No. 16-72 regarding the Project's pedestrian-oriented design. Note that as a non-residential use, the Project is not required to provide public open space. With regard to General Plan Framework Objective 7.2, as set forth above, this objective does not address homelessness or crime. With regard to crime, refer to Response to Comment No. 16-5 regarding the Project's less-than-significant impacts associated with police protection. With regard to homelessness, refer to Response to Comment No. 16-8.

Comment No. 16-48

Policy 7.2.3 How will shuttle work with the Motion Picture Academy Museum special events along Fairfax? App I p. 12.

Response to Comment No. 16-48

This comment does not concern CEQA issues or the Draft EIR's analysis of the Project's potential impacts. Nevertheless, a response is provided below for informational purposes.

As discussed on page IV.K-38 in Section IV.K, Transportation, of the Draft EIR, the Project's TDM Program would include a shuttle service between the proposed Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site, and the shuttle will operate during typical commuter peak periods. Most major events at the Academy Museum of Motion Pictures occur on weekends or during the evening hours of a weekday. Thus, the shuttle hours of operation are not anticipated to overlap with special events at the Academy Museum of Motion Pictures. In the event that normal shuttle operations would be disrupted, suitable detours or alternative services would be utilized.

Comment No. 16-49

LAND USE

- Findings are incomplete
- Not a geographic area with significant social, economic, or physical identity.
- Check on batching—how many times has the GP been amended this year?

Response to Comment No. 16-49

The comment regarding the findings provides no evidence to support the statement that the land use findings are incomplete. The commenter alleges that the Project is not located in an area with significant social, economic, or physical identity. The commenter appears to be referring to the General Plan Framework's definition of "Regional Commercial." Refer to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial designation for the Project Site.

In accordance with all applicable processes and procedures, the Project sought issuance of City Planning Form No. CP-7750.1 (General Plan Amendment Initiation Request Form) prior to filing the application with the Department of City Planning. Initiation of General Plan Amendments is at the discretion of the Director or their designee. Note that the Department of City Planning does not utilize "batching" or "batching windows" when reviewing General Plan Amendments. Regardless of the City's procedures for reviewing General Plan Amendments, this comment regarding batching does not raise a CEQA issue or identify any deficiency in the analysis provided in the Draft EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-50**Ch. IV.H. Land Use and Planning**

- LAMC: ***violates how height is measured.*** LAMC 12.21.1 natural grade. **Requires Variance.**

Response to Comment No. 16-50

Refer to Response to Comment No. 16-. As discussed therein, height would be regulated by the proposed Specific Plan, and a variance would not be required.

Comment No. 16-51

- **ZI-1195** review by **dept of conservation, division of oil, gas, and geothermal resources??** Did they consult? Is there a letter?

Response to Comment No. 16-51

Effective January 1, 2020, the California Department of Conservation's Division of Oil Gas and Geothermal Resources (DOGGR) was renamed the Geological Energy Management Division (CalGEM). CalGEM oversees the drilling, operation, and closure of oil and gas wells within the State of California. City Zoning Information No. 1195 (last revised on 08/13/2020) requires that projects on a lot(s) with a ZI-1195 notation obtain clearance from the LAFD prior to permit issuance. During plan check, the Plan Check Engineer shall instruct the Applicant to obtain a Construction Site Well Review (CSWR) report from CalGEM prior to contacting the LAFD. None of the lots identified within the Project Site are noted by ZIMAS as being subject to Zoning Information No. 1195. Also refer to Response to Comment No. 26-105 regarding how the Project would comply with all applicable regulatory requirements, including LAMC Section 91.7109.2, which requires LAFD notification when an abandoned oil well is encountered during construction activities and requires that any abandoned oil well not in compliance with existing regulations be reabandoned in accordance with applicable rules and regulations of CalGEM (see page IV.F-18 of the Draft EIR).

Comment No. 16-52

- Fox Studio Expansion to build office tower for "synergistic creativity" was immediately sold to a non-studio owner. Fool me once, shame on you.... The use the phrase on p. "synergistic mix" Appendix A, p. 3. is a warning.

Response to Comment No. 16-52

Refer to Response to Comment No. 5-15 and Topical Response No. 3, Permitted On-Site Uses, regarding the studio purpose of the Project. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-53

- **The DEIR fails to analyze consistency with Measure JJJ. LAMC 11.5.8.**

Response to Comment No. 16-53

The Project Site is not improved with any residential uses. In addition, the Project does not propose or has submitted any General Plan Amendment, Zone Change, or Height District change that would introduce any residential uses to the Project Site. Measure JJJ, codified in part in Section 11.5.8 of the LAMC, instituted requirements related to housing development projects requiring General Plan Amendments and Zone and Height District changes, including, but not limited to, the on-site provision of affordable housing units or in-lieu fees for restricted affordable residential dwelling units. Therefore, no analysis of consistency with Measure JJJ is required or applicable as the Project does not propose any housing units.

Refer to Response to Comment No. 16-2 regarding the Specific Plan's provisions to maintain the housing density allowed on-site at the time of application submittal.

Comment No. 16-54

- **No Draft Development Agreement.** Again, the devil is in the details. This is a contract with the City that requires transparency.

Response to Comment No. 16-54

Refer to Response to Comment No. 16-1. As discussed therein, the Development Agreement would only allow for development consistent with the Project described in the certified EIR. Other provisions of the Development Agreement would be contractual matters between the City of Los Angeles and the Applicant and do not constitute environmental impacts under CEQA. Accordingly, the Development Agreement is not required to be included as part of the EIR.

Comment No. 16-55

- **This project is inconsistent with the Housing Element.** p. II-9.

Response to Comment No. 16-55

Refer to Response to Comment No. 16-2 regarding how the Project would not conflict with the Housing Element.

Comment No. 16-56

- **Will new sidewalk dimensions comply with MP 2035?** What is a frontage area that includes sidewalk? Where is the property line, the building line, etc.?

Project Des. Says what the current sidewalks are but not what the new ones will be. p. II-9

Response to Comment No. 16-56

Refer to Response to Comment Nos. 16-30, 16-72, and 16-76 regarding sidewalk and frontage widths and Mobility Plan consistency. Regarding the frontage areas, the frontage areas dictate the placement, orientation, mass, and height of potential future buildings. The frontage areas may include areas for pedestrian access. However, a frontage area is not equivalent to a setback or building line, which are established by zone or ordinance, respectively. The Project Site is currently located in multiple zones with minimal to zero setback requirements and is not subject to any building line ordinance.

Comment No. 16-57

- **Identify off-site uses and their neighborhood intrusion impacts (App I, p. II-11)**

Response to Comment No. 16-57

It is unclear what this comment is specifically referring to. Nonetheless, the Project does not include any off-site uses, and off-site parking and truck staging are no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Figure 1 depicting the on-site staging areas has also been included in Appendix FEIR-8 of this Final EIR. In addition, existing off-site uses that are not a part of the Project are identified in Section II, Project Description, of the Draft EIR (see pages II-2 through II-5) and throughout the impact analyses within the Draft EIR.

Comment No. 16-58

- **What is a rooftop zone (Zone F)?** p. II-20.

Response to Comment No. 16-58

As described on pages II-19 and II-20 and illustrated in Figure II-5 of Section II, Project Description of the Draft EIR, Height Zones E and F are “rooftop zones” with specific limitations to preserve the integrity of the Primary Studio Complex. As stated therein:

- **Height Zone E—84-Foot Height Limit:** Height Zone E is a rooftop zone that extends a length of approximately 350 feet along the northern façades of the Primary Studio Complex at a beginning point 55 feet south of the northern façade of the Studio Building. Height Zone E is not subject to the base height limit of 88 feet but rather limits any rooftop addition to a height limit of 84 feet.

Accordingly, new construction in Height Zone E would be limited to a height of 36 feet above the existing parapet of the Studio Building within the entirety of the Height Zone E area.

- **Height Zone F—HCM Protection Zone:** Height Zone F is a rooftop zone that extends a length of approximately 350 feet along the northern façades of the Primary Studio Complex and approximately 167 feet south from the northern façade of the Service Building and approximately 55 feet south from the northern façade of the Studio Building. Height Zone F is not subject to the base height limit of 88 feet but prohibits the construction of any new occupiable building. Non-occupiable structures and elements, such as circulation elements, sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and appurtenances, would be permitted with no height limit. Existing rooftop appurtenances in Height Zone F may be maintained and modernized as long as screening is provided in compliance with the Specific Plan.

Comment No. 16-59

- **Project is inconsistent with the General Plan Framework designation for neighborhood commerce**, as opposed to a regional center designation. p. II-36).
- See also Land Use Tables, p. 2. Policy 3.1.4—conflicts with framework location for regional centers. Figure 3-1 GPF.

Response to Comment No. 16-59

As discussed in Section IV.H of the Draft EIR, the Project is consistent with the General Plan Framework Element. As stated within the General Plan Framework's Long Range Land Use Diagram (Figure 3-1), which is included as Attachment A to this Comment Letter, because the Framework Element extends citywide, the Framework Element cannot anticipate every detail. Therefore, the community plans dictate the final determinations related to boundaries, land use categories, intensities, and heights that fall within the ranges described in the Framework Element. The Wilshire Community Plan currently designates the Project Site as Neighborhood Office Commercial, Limited Commercial, and Community Commercial. The Project involves a General Plan Amendment to change the various land use designations to a consistent Regional Commercial designation and assigns the Regional Commercial designation to an approximately 0.63 acre portion of the Project Site located in an unincorporated area of the County to be annexed to the City. Refer to Response to Comment No. 16-4 regarding the General Plan Framework Element land use diagram and to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial land use designation. Also refer to page 2 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR regarding how the Project would not conflict with Framework Element Policy 3.1.4.

Comment No. 16-60

- **Violates Policy 3.2.4: it does not enhance the character of commercial district:** it is an inward-facing development and does not contribute to a neighborhood commercial, pedestrian friendly district. Appendix A, p.5. [sic]

Response to Comment No. 16-60

Contrary to the assertion of the commenter, the Project would include outward facing components, including numerous public realm improvements, as discussed in detail on pages 4 and 5 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, where the Project's lack of conflict with Policy 3.2.4 is discussed. Refer also to Response to Comment No. 16-47.

Comment No. 16-61

- **Conflicts with Objective 3.16 because it does not enhance pedestrian activity.** Also, Policy 3.1, 2.3: walking across multiple driveways is dangerous and stressful. App p. 12. **Multiple driveways create pedestrian hazard and interrupt pedestrian flow.** For pedestrians, this is like running the gauntlet, dodging cars anxious to get to work, etc. App. A, p. 8

Response to Comment No. 16-61

Refer to Response to Comment No. 16-11 and Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding pedestrian safety at the proposed driveways and traffic hazards. As discussed therein, all driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety.

The Project itself includes wider sidewalks and wider landscaped parkways around the west, north, and east sides of the Project Site, thus enhancing the pedestrian realm as called for in Objective 3.16. Street facing retail on the Fairfax Avenue and/or Beverly Boulevard sides of the Project Site and an open park-like setting available to the public along Beverly Boulevard will also enhance pedestrian activity.

Comment No. 16-62

- **Policy 3.3: the project does not promote equitable land use** decision because it will increase congestion and remove the neighborhood serving retail proposed for Mixed Use Boulevards. There will not be a destination along these boulevards for residents. App I p. 13-14.

Response to Comment No. 16-62

Policy 3.3 of the Framework Element reads as follows: “Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.” As set forth on page 13 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would not conflict with this policy. As described in more detail therein, the Project would include amenities, such as a Mobility Hub and a potential childcare use, among many others, and the Project would also expand employment opportunities in close proximity to residential areas, destinations, and local serving retail and restaurants which would result in reduced vehicle trips. Furthermore, contrary to this comment, the Project would provide a limited amount of neighborhood serving retail uses that do not currently exist within the Project Site, which would activate the street frontage along Beverly Boulevard and/or Fairfax Avenue.

Comment No. 16-63

- **Policy 3.3: VMT does not measure the impacts of congestion on emergency service response time, as noted by the City’s CEQA Threshold Guide.** This Guide also requires a map showing all of the intersections at LOS D or F between the project site and the nearest fire station (K)., p. 13.p. [sic] 14, the shuttle is only for employees, not neighbors or visitors. P.14. [sic]

Response to Comment No. 16-63

Policy 3.3 of the General Plan Framework Element does not relate to the impact of congestion on emergency response times. It encourages “equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.” As discussed on page 13 of Appendix I, Land Use Plans Consistency Analysis Tables, to the Draft EIR, the Project “would expand employment opportunities in close proximity to residential areas, destinations, and local-serving retail and restaurants.” This would reduce trips by offering “convenient, non-commute commercial opportunities for Project employees and visitors.” The Applicant has committed to providing a shuttle for Project employees, visitors, and audience members between the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project Site, which would further reduce vehicle trips by improving transit access to the Project Site. Under its currently planned operation, the shuttle would not be open to the public, but service to the general public along this route would likely be covered by the DASH service in the area.

Although not required by CEQA, a map of LOS E or F intersections between the Project Site and the nearest fire station is provided as Figure II-3 in Topical Response No. 12, Safety and Congestion.

Comment No. 16-64

- **Policy 9.3.1 conflicts** because the excavation may release **hydrocarbons from the oilfield** that will need to be discharged to the storm drain and require treatment and an **NPDES permit from the Feds**. App I, p. 16.
- There may be a need to be **toxic cleanup** around the refueling facilities and testing to see if this had entered the groundwater table. Need state clean-up and removal to a **Class I landfill**.

Response to Comment No. 16-64

The Project fully complies with Policy 9.3.1 of the Framework Element regarding reducing potential hazardous substances and flow entering the wastewater system as discussed on page 16 of the Land Use Plans Consistency Analysis Tables included in Appendix I of the Draft EIR. Refer also to Response to Comment No. 13-4 regarding hydrocarbons and the oilfield and the former gas stations and Response to Comment No. 16-28 regarding potential groundwater contamination. The nature and extent of petroleum hydrocarbon impacts in soil and groundwater at the Project Site are described in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Site Summary Report (Appendix G.1 of the Draft EIR), and various groundwater monitoring reports for the former Texaco station (see State of California Geotracker database; <https://geotracker.waterboards.ca.gov/>). These investigations identified naturally-occurring tar in an isolated area near the southwest boundary of the Project Site where a tar collection system is located. These reports also document residual petroleum hydrocarbons in soil associated with the former Texaco station that had been located on the Project Site, which received cleanup approval from the LARWQCB under the State's Low Threat Closure Policy (see Geotracker; <https://geotracker.waterboards.ca.gov/>). No further soil remediation is required, but any soil excavated from the Project Site will be tested, analyzed, and disposed of following the procedures described in the Soil Management Plan per Mitigation Measure HAZ-MM-1. Similarly, the presence of residual petroleum hydrocarbons in the Project Site groundwater does not require remediation, but the groundwater that is pumped during the temporary construction dewatering efforts onsite may require treatment, pursuant to the applicable discharge permit. As stated on page IV.F-44 of the Draft EIR, a discharge permit will be obtained from either the LARWQCB (NPDES permit) or LASAN (sanitary sewer industrial discharge permit), depending on the appropriate discharge point, and any discharge of groundwater would need to comply with all applicable regulatory requirements. Pursuant to such requirements, the extracted groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal methods and will result in a less-than-significant impact as stated in the Draft EIR.

This comment discusses the need for "toxic cleanup" around the refueling facilities. Refer to Response to Comment Nos. 13-6 and 16-28 for a discussion of the former

Anderson V L and Texaco stations and to Response to Comment No. 26-83 regarding the disposal of contaminated soil. There are no existing refueling facilities on the Project Site and, as clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, no future fueling or refueling facilities are proposed by the Project.

Comment No. 16-65

- **Also, this is in a flood plain, which is not disclosed.**

Response to Comment No. 16-65

As discussed on page IV.G-38 in Section IV.G, Hydrology and Water Quality, of the Draft EIR, the Project Site is not located within a 100-year flood plain as mapped by FEMA. The northwestern portion of the Project Site is located in an area of minimal flood hazard, while the remainder of the Project Site is located in Zone X, which is defined as a flood hazard zone with a 0.2 percent annual chance of flooding. While minor changes in the direction of surface water flow could result from new finished grades onsite, overall drainage patterns would be maintained as shown in Figure IV.G-1 on page IV.G-21 of the Draft EIR (and as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR), and the Project Site would continue to sheet flow towards the southern boundary. As such, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows, and no impacts related to flood flows would occur.

Comment No. 16-66

- **Goal AC: Adequate water supply. CONFLICT:** We are in an historic drought, rationing, and sources drying up. The WSA is inaccurate and does not account for the historic drought. App I, p. 17. Under these circumstances, the Wilshire CP requires that if funds are not available to fix the problem (public services, utilities, water, etc.) within a year, then an ICO is required, while entitlements are downzoned. Under drought, there can be no discretionary increases in density or intensity.

Response to Comment No. 16-66

The analysis of water supplies is based on the Water Supply Assessment (WSA) process completed with LADWP as required by SB 610 and not the Wilshire Community Plan. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, a WSA was prepared for the Project and adopted by LADWP. The WSA, which is included as Appendix N of the Draft EIR, was completed in full compliance with all applicable regulatory requirements, and the commenter's statement that the WSA is inaccurate is false. As stated on page 21 of the WSA, LADWP concluded

that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 Urban Water Management Plan (UWMP) would be sufficient to meet the Project's estimated water demand, in addition to the existing and anticipated future water demands within LADWP's service area through the year 2045, which exceeds the Project's Development Agreement term of 2043.

The WSA specifically addresses drought conditions and near-term drought risk management (refer to page 10 of the WSA), and the detailed discussion of drought conditions and plans to address such drought conditions throughout Appendix F of the WSA. In addition, as discussed on page IV.M.1-40 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth by expanding local water supply programs and reducing demands on purchased imported water. Note that the commenter references Appendix I of the WSA. However, the WSA does not include an Appendix I.

Comment No. 16-67

- **Policy 1-1.2: conflict:** The project would remove residential uses by changing the property from neighborhood serving commercial with mixed-use residential, and thousands of proposed dwelling units per the Housing Element, to only commercial uses. App I, p. 18. As such, this plan amendment is **spot zoning**. It is not near the Wilshire regional center. p. 19

Response to Comment No. 16-67

Refer to Response to Comment No. 16-2 with regard to housing. Refer to Response to Comment Nos. 5-8 and 11-29 regarding the concern about spot zoning and the Regional Commercial designation.

Comment No. 16-68

- Any investigation of **venturi effect** around the tall buildings, or of **heat-island effects** from so much hardscape and buildings? See p. 19.

Response to Comment No. 16-68

As discussed on page IV.G-34 of Section IV.G, Hydrology and Water Quality, of the Draft EIR, the Project would not result in an increase in impervious surfaces within the Project Site. In addition, as discussed on page II-23 in Section II, Project Description, of the Draft EIR, the Project would include planting zones and associated planting palettes that would be established to define streetscape areas, gateways and major Project Site

entrances, production areas, bungalows, and rooftop terraces. Plantings would include resilient, drought-tolerant non-invasive and adaptive tree, shrub, and groundcover species, including shade trees. A minimum of approximately 28,900 square feet of landscaped open space would be also located along the Project Site boundaries. The provision of open space under the Project would be an improvement in comparison to the limited amount of landscaped area under existing conditions and as such proposed landscaped open space would serve to potentially reduce the “heat-island” effect. Furthermore, as discussed on page II-17 of the Draft EIR, much of the Project Site would be subject to a base height limit of 88 feet as measured from Project Grade. This base height limit would be augmented with maximum height limits in limited portions of certain height zones. Please refer to Response to Comment No. 26-E.1-2 for a discussion of why the Project would not result in “venturi” effects also known as “air canyon” effects.

Comment No. 16-69

- Policy 2-2.2: **encourage large mixed-use projects.** Mixed-use is combining commercial with residential. This project excludes residential. App. A, p. 19.

Response to Comment No. 16-69

Framework Element Policy 2-2.2 does not specify that a large mixed-use project must include residential uses. Rather, the policy states: “Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.” As described in more detail on page 19 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would not conflict with this policy as the Project would include on-site retail uses and support uses, such as a childcare use.

Comment No. 16-70

POLICE

- Objective 8-1 “provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.” FEIR SOS for GPF states 17000 officers needed in 2001. We are way below that number. Response times show inadequate staffing. ARE RESPONSE TIMES PROVIDED [sic] IN EIR?
- Policy 3.3.2 mitigation through policy requires (as a mandatory mitigation measure) that response time, etc. be adequate for current and added demand. No evidence since fail to provide “adequate” measure. Arbitrary and capricious.

- City has failed to adopt Standards of Cover for LAPD and LAFD. Started, but has not completed.
- Claim project tax revenues could provide new police facilities. Is this analyzed as an environmental impact? (App. A., p. 22)

Response to Comment No. 16-70

These comments are similar to the commenter's previous comments. With regard to the adequacy of LAPD police protection services and infrastructure, refer to Response to Comment Nos. 16-5 and 35-133. With regard to mitigation measures and the General Plan Framework policies, refer to Response to Comment Nos. 16-5 and 16-6. With regard to the Wilshire Community Plan policies, refer to Response to Comment No. 16-7.

Refer to Response to Comment Nos. 9-35 and 26-147, and Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, regarding emergency response times.

The comment regarding Standards for Cover is not specific to the Project and does not relate to the Draft EIR's analysis of environmental impacts. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to tax revenues, as discussed on page IV.J.2-15 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Tax revenue is not an environmental impact under CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-71

FIRE:

- **Water pressure inadequate.** During drought, this puts a strain on pressure for the entire area. In the event of an earthquake, the residential neighborhood would lose pressure. There is only so much to go around. (App I p. 22)

Response to Comment No. 16-71

With regard to the adequacy of LAFD fire protection services and infrastructure, including water pressure, refer to Response to Comment Nos. 16-5, 16-10 and 26-147. Also refer to Response to Comment No. 16-66 regarding the adequacy of water supplies to serve the Project, including during drought conditions.

Comment No. 16-72

- Objective 2-2, Policy 2-2.1: does not encourage pedestrian-oriented design for the public. App I, p. 19. It does not enhance the public realm, but is a project that is a closed, secure site that turns its back on the community, shuts it out, and denies it the neighborhood-serving mixed-use boulevards promised by the General Plan and by the GPF. In fact, rather than improving the pedestrian experience, it creates pedestrian hazards with multiple driveways along both boulevards.

Response to Comment No. 16-72

An analysis of the Project's consistency with Objective 2-2 and Policy 2-2.1 of the Wilshire Community Plan is included on page 19 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. This analysis states the following:

<p>Objective 2-2: Promote distinctive commercial districts and pedestrian-oriented areas.</p> <p>Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.</p>	<p>No Conflict. As previously discussed, the Project would enhance the public realm through streetscape improvements to the pedestrian experience, while continuing to provide for the unique security needs of a working production studio. In particular, the Project has been designed to restore views of the HCM from Beverly Boulevard (which are currently obstructed). A minimum of approximately 28,900 square feet of open space would be provided along the Project Site boundaries. These perimeter areas would include landscaping such as trees and shrubs, lighting, wayfinding signage, and pedestrian amenities such as benches and shade structures. Thus, the proposed Project would represent a positive contribution to the commercial and pedestrian environment in the Wilshire Community Plan area. As such, the Project would not conflict with this objective and associated policy.</p>
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Also note that the Project Site is and will continue to be a secured studio campus that, by its nature, requires a secured perimeter. Nevertheless, the Project's design is pedestrian-oriented and enhances the public realm. Accordingly, the Draft EIR concluded that the Project would not conflict with Objective 2-2 and Policy 2-2.1. Further, as discussed on pages IV.H-51 to IV.H-52 of the Draft EIR, the Project would create a pedestrian-oriented public realm along Fairfax Avenue, Beverly Boulevard, and The Grove

Drive to accommodate pedestrian travel and provide a more comfortable pedestrian environment. The Project would include new landscaping along all public Project Site frontages, upgraded bus stops around the Project Site perimeter as needed, and signalization of the currently uncontrolled crosswalk across Fairfax Avenue at 1st Street. Furthermore, the Applicant would make a financial contribution toward pedestrian facility improvements as part of Vision Zero.

With regard to pedestrian access at the Project driveways, the busiest driveways would be controlled by a traffic signal, which would help reduce the pedestrian/vehicular conflicts along the sidewalks. Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding pedestrian safety at the proposed driveways. As discussed therein, all driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety.

As stated on page IV.H-17 of the Draft EIR, under State Planning and Zoning Law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. As discussed in Section IV.H, Land Use and Planning, and Appendix I of the Draft EIR, the Project would be consistent with the objectives and policies that support the goals of the Wilshire Community Plan.

Also refer to Response to Comment No. 9-29 regarding transportation-related hazards.

Comment No. 16-73

- UNLESS the project changes, which it can, and then with the Regional Center designation, the residential density would be R5, the highest density permitted in the city. But the project that was studied most definitely removes the option of both neighborhood-serving commercial and residential uses.
- Policy 2-1.2: not adhering to the community plan land use designations App p. 19. Disregarding neighborhood serving commercial and Mixed-Use Boulevards. To complement the existing residential community.

Response to Comment No. 16-73

The proposed Regional Commercial designation would not affect the residential dwelling-unit density regulations for the Project Site. Refer to Response to Comment No. 16-2 with regard to the Project Site's residential potential. The commenter appears to be referring to Section 12.22 A.18(a) of the LAMC, which states, "Any use permitted in the R5 Zone [is permitted] on any lot in the CR, C1, C1.5, C2, C4, or C5 Zones provided that

such lot is located within the Central City Community Plan Area or within an area designated on an adopted community plan as Regional Center or Regional Commercial. Any combination of R5 uses and the uses permitted in the underlying commercial zone shall also be permitted on such lot.” No changes to the existing allowable residential density will occur as a result of the Project. Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed General Plan Amendment. Refer to pages 17 and 18 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR regarding how the Project does not conflict with General Plan Framework Policy 2-1.2. Also refer to Response to Comment No. 16-2 regarding the General Plan Framework Element’s designation of Fairfax Avenue as a Mixed-Use Boulevard.

Comment No. 16-74

- **Goal 9B: project site drainage patterns** likely to change because of **high water table** on site and **excavation. App I p. 16. In addition, subsidence may occur damaging historic resources.**
- **Permanent dewatering post-construction was not analyzed.**

Response to Comment No. 16-74

In accordance with Appendix G of the CEQA Guidelines, the Draft EIR analyzed the Project’s potential to alter the existing drainage pattern of the Project Site or area on pages IV.G-34 to IV.G-38 in Section IV.G, Hydrology and Water Quality, and concluded that impacts would be less than significant, as discussed below.

As stated on page IV.G-35 of the Draft EIR, construction activities for the Project have the potential to temporarily alter existing drainage patterns on-site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the Project would be subject to the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all applicable NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit

regulations, Project construction activities would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site, and impacts would be less than significant.

As discussed on pages IV.G-35 to IV.G-36 of the Draft EIR, as illustrated in Figure IV.G-1 on page IV.G-21 of the Draft EIR (and as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR), the existing drainage areas and overall drainage patterns would remain unchanged as a result of Project implementation. As discussed above, similar to existing conditions, the Project Site would continue to be comprised of up to approximately 90 percent impervious surfaces following Project buildout. As such, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. In addition, as determined in the Hydrology and Water Quality Report included as Appendix H of the Draft EIR and as summarized in Table IV.G-1 on page IV.G-36, the overall surface water flow rate would not change with implementation of the Project. Specifically, existing runoff flows during a 50-year storm event are 53.53 cubic feet per second (cfs) of stormwater.¹²⁴ As shown in Table IV.G-1, runoff flows during Project operation would remain the same at 53.53 cfs during a 50-year storm event. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, the Project's stormwater infrastructure would be designed to convey the 50-year storm to the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. Accordingly, drainage within the Project Site during operations would be similar to current conditions. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur, and impacts would be less than significant.

As discussed on page IV.G-37 of the Draft EIR, under existing conditions, stormwater sheet flows from the Project Site without infiltration or capturing. In accordance with LID requirements, the Project BMPs would control stormwater runoff, with no increase in runoff resulting from the Project Site, as shown in Table IV.G-1 on page IV.G-36. Specifically, the existing flow rate of 53.53 cfs would remain with implementation of the Project. Therefore, stormwater flows from the Project Site would not increase due to the Project. In terms of polluted runoff, the Project's uses would be typical of studio operations, similar to existing conditions, and would not introduce new or substantial sources of polluted water. Anticipated and potential pollutants generated by the Project would include sediment, nutrients, pesticides, metals, pathogens, oil, and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants and prevent

¹²⁴ Table IV.G-1 in Section IV.G, Hydrology, included a clerical error that has been corrected in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The existing and proposed flow rate is 53.53 cfs.

pollution of stormwater runoff. As such, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system or provide substantial sources of polluted runoff, and impacts would be less than significant.

As discussed on page IV.G-38 of the Draft EIR and in Response to Comment No. 16-65, the Project Site is not located within a 100-year flood plain as mapped by FEMA. As discussed in Response to Comment No. 16-65, the northwestern portion of the Project Site is within an area of minimal flood hazard while the remainder is located within Zone X, which is a flood hazard zone with a 0.2 percent annual chance of flooding. While minor changes in the direction of surface water flow could result from new finished grades onsite, overall drainage patterns would be maintained as shown in Figure IV.G-1 on page IV.G-21 of the Draft EIR (and as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR), and the Project Site would continue to sheet flow towards the southern boundary. As such, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows, and no impacts would occur.

The Draft EIR did not analyze permanent dewatering because the Project would not include permanent dewatering post-construction. As recommended in the Preliminary Geotechnical Engineering Investigation for the Project (Appendix E.1 of the Draft EIR), the proposed structures will be designed for hydrostatic pressure such that the temporary construction dewatering system will be terminated at the completion of construction, allowing the groundwater to return to its pre-construction levels and natural drainage pattern.

Refer to Response to Comment Nos. 3-7 and 11-5. As discussed in Response to Comment No. 11-25 and in the Dewatering Report included as Appendix FEIR-13 of this Final EIR, temporary construction dewatering will be designed to minimize impacts to neighboring properties, including the potential for settlement or subsidence in the vicinity of historic structures. As stated on page IV.D-14 in Section IV.D, Geology and Soils, of the Draft EIR, no permanent large-scale extraction of groundwater, gas, oil, or geothermal energy currently occurs or is planned at the Project Site. As discussed in the Geotechnical Addendum II, prepared by Geotechnologies Inc., and included as Appendix E.5 of the Draft EIR, based on the age of the older surficial sediments that underlie the Project Site, subsidence is not anticipated on-site. Therefore, the potential for ground subsidence due to the withdrawal of fluid or gas at the Project Site, including to the historical resources, is low, and subsidence is not anticipated to result in damage to historical resources, as confirmed in the analysis conducted by Geotechnologies, Inc. in Appendix D of the Dewatering Report. As concluded therein, the subsidence effects on neighboring properties, including historic buildings, would be negligible and less than significant with the implementation of regulatory groundwater infiltration control measures and shoring

techniques discussed in the Dewatering Report; refer also to the regulatory summary included in Appendix FEIR-11 of this Final EIR.

Comment No. 16-75

- **Conflicts with Objective 3.3** because it does not provide adequate transportation, utility infrastructure and public services (emergency services, etc.) Appendix A, p. 5.
- Conflicts with Goal 3L promote pedestrian activity and provide a quality experience for the city's residents. It does the opposite—inward, no street life/commercial. Multiple queues seeking to enter the site will impede the flow of traffic.
- **What is the queuing space?** p. Appendix A, p. 7
- What is the **required turning radius for an 18-wheeler** to access or exit the project site?

Response to Comment No. 16-75

Refer to Sections IV.K, Transportation; IV.M, Utilities and Service Systems; and IV.J, Public Services, of the Draft EIR, which comprehensively analyzed the Project's potential transportation, utilities, and public services impacts, respectively, and determined the impacts to be less than significant.

Refer to Response to Comment No. 16-72, above, for a discussion of the Project's pedestrian-oriented design and amenities. As discussed therein, while the Project requires a secured perimeter, pedestrian amenities have been included to the extent possible. In addition, the Project would include up to 20,000 square feet of retail space accessible to the public, which is intended to activate the frontages along Beverly Boulevard and/or Fairfax Avenue.

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding queue lengths. Overall, adequate queuing storage would be provided at each Project driveway to minimize the potential for vehicles to back out into the adjacent arterial streets.

As discussed in Response to Comment No. 16-11, the turning radius requirements of trucks entering and leaving the Project Site at each driveway have been checked and found to be adequate. The truck radii would be verified again by LADOT when the driveway permits are sought.

Comment No. 16-76

- Analyze the impacts on queuing, vehicular congestion, and pedestrian safety of eliminating many of the driveways and providing an internal circulation road?
- Objective 11-2: promote pedestrian mobility. Conflicts because of multiple driveways. Pedestrian-oriented streets are designed to be as free from driveways as possible. This project appears to violate the concept of pedestrian-oriented streets.
- Will sidewalk dimensions comply with MP 2035 15-foot sidewalks (not including the property that is fenced-in?)
- Policy 11-2.3: protect and improve existing pedestrian-oriented street segments. ***Conflicts because it creates new pedestrian hazards*** (driveways) that are not mitigated. App I, p. 24.

Response to Comment No. 16-76

Refer to Response to Comment Nos. 16-11 and 9-29 and Sections A, Queuing at Project Driveways; B, Level of Service; and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding queuing, the number and location of the proposed driveways at the Project Site, pedestrian safety at those driveways and traffic hazards. The comment regarding mitigating pedestrian hazards is incorrect because the transportation analysis found that the Project would not cause any significant pedestrian impacts, and therefore no pedestrian mitigations are necessary.

As described on pages IV.K-55 to IV.K-57 in Section IV.K, Transportation, of the Draft EIR, currently, the public sidewalks and landscape parkways around the Project Site perimeter range from nine to 15 feet wide, and the areas accessible to pedestrians are as narrow as 3 to 4 feet along portions of The Grove Drive and Fairfax Avenue. Further, the existing sidewalk widths along The Grove Drive and Fairfax Avenue do not meet current Mobility Plan standards. The Project would maintain the existing variable 12- to 15-foot sidewalk area along Beverly Boulevard, in accordance with the Mobility Plan.¹²⁵ In addition, the Project would provide a varying 5- to 8-foot-wide frontage area (including a portion of the sidewalk) for a total 20-foot-wide sidewalk and frontage area along the entire Project Site edge along Beverly Boulevard. The Project proposes to provide a 15-foot sidewalk on Fairfax Avenue, plus a 17-foot-wide frontage area (including a portion of the

¹²⁵ Specifically, the sidewalk width meets the standard of 15 feet adjacent to the Project Site; however, on Beverly Boulevard toward Fairfax Avenue where the roadway widens up to three feet to accommodate the westbound left-turn lane to Fairfax Avenue, the sidewalk is reduced to approximately 12 feet. In consultation with the Los Angeles Bureau of Engineering, the existing configuration is considered generally compliant with the Mobility Plan, and no dedication or widening is required.

sidewalk), for a total 20-foot-wide sidewalk and frontage area along the entire Project Site edge along Fairfax Avenue. The Project would provide a 10-foot sidewalk on The Grove Drive, plus a 7-foot-wide frontage area (which includes a portion of the sidewalk), for a total 14-foot-wide sidewalk and frontage area along the entire Project Site edge along The Grove Drive. Although this would remain narrower than the 13-foot standard in the Mobility Plan, it would exceed the existing sidewalk width. Thus, the Project would be consistent with the intent of the Mobility Plan. Refer to Figures IV.H-3 through IV.H-6 in the Draft EIR, which shows the proposed sidewalk and frontage improvements.

Comment No. 16-77

- Will greenhouse gases be released by dewatering the site during construction?

Response to Comment No. 16-77

Refer to pages IV.E-74 through IV.E-77 of Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, and Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR regarding the analysis of greenhouse gas (GHG) emissions during construction. Dewatering equipment was included in the construction assumptions as pumps were included in the CalEEMod modeling on pdf page 31 of Appendix B of the Draft EIR, and the GHG emissions reported in Table IV.E-10 on page IV.E-77 of the Draft EIR include emissions from this equipment. In addition, shoring would be required during site preparation (concurrent with demolition activities) occurring prior to dewatering activities. The additional equipment required for shoring and its associated electricity usage associated with pumping equipment is also included within the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR). Please note that the inclusion of GHG emissions from shoring equipment and electricity usage associated with pumping equipment does not change the less than significant GHG impact conclusions in the Draft EIR.

Comment No. 16-78

- Project is inconsistent with General Plan Framework Policy 3.3.2.

Response to Comment No. 16-78

Refer to Response to Comment No. 16-6 with regard to General Plan Framework Policy 3.3.2. Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation.

Comment No. 16-79

- **The heights** proposed are inconsistent with the neighborhood-serving designation for the commercial development. Project description p. II-18
- Changing how height is measured requires a variance of a code amendment. (p. II-31)

Response to Comment No. 16-79

The commenter appears to reference a height limit related to the “Neighborhood Office Commercial” land use designation of the land use map of the Wilshire Community Plan. However, no such specific height limit exists. For informational purposes, in the City of Los Angeles, height limitations are imposed on parcels by Height Districts, primarily codified in Section 12.21.1 of the LAMC, or by specific plan or other specialized overlay or district. A Height District may only be assigned to a land use designation of the General Plan or Community Plan by creation of a General Plan footnote. However, no such footnote applies to the Project Site.

As discussed in Response to Comment No. 16-21, height would be regulated by the proposed Specific Plan. Accordingly, a variance would not be required.

Comment No. 16-80**Project is inconsistent with Wilshire Community Plan:**

- **No analysis of off-site uses, shuttles, etc. Employees, audiences (p. II-29)**

Response to Comment No. 16-80

The Project does not include any off-site land uses that need to be analyzed. As discussed in Section IV.K, Transportation, of the Draft EIR, the Project’s TDM Program would include a shuttle service between the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project Site for employees and visitors, and the shuttle will operate during typical commuter peak periods. The Mobility Hub would support shuttle service between the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project Site, as well as future shuttle services connecting to other existing and/or future transit stations (e.g., the Metro B (Red) Line or Metro K (Crenshaw) North Extension). The comment references page II-29 of the Draft EIR, which includes Figure II-9, Conceptual Mobility Hub. As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, the impacts associated with the Mobility Hub were fully analyzed in the EIR.

To provide a conservative transportation analysis, the Project's automobile trip generation was reduced by only 15 percent to account for transit, bicycle and pedestrian modes of travel to/from the Project Site. In the more robust TDM Program proposed by the Project, the proposed shuttle bus system is expected to provide buses with a capacity of approximately 40 passengers. The goal is to provide 10- to 15-minute headways for each of the shuttle buses for the four hours of the morning and the four hours of the afternoon peak commute hours, which along with limited mid-day service would provide the Project Site with the ability to move over 1,600 employees and visitors between the Project Site and the subway station per day as shown in the Mobility Hub memorandum included as Appendix FEIR-20 of this Final EIR. Table 6 on page 81 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the traffic impact study only accounted for 170 to 180 trips in the morning and afternoon peak one-hour periods, respectively. Thus, the shuttles included as part of the enhanced TDM Program could potentially reduce the traffic impacts of the Project as measured in the Draft EIR by approximately 1,365 net automobile trips per day to/from the Project Site (including the reduction of 1,469 vehicle trips and the creation of 104 shuttle trips as shown in Table 3 of the Mobility Hub memorandum).

Employee and audience trips were accounted for and analyzed in the transportation analysis in Section IV.K, Transportation, of the Draft EIR, as discussed in Topical Response No. 8, Vehicle Miles Traveled, and Sections A, Empirical Data, and B, Visitor Trips, of Topical Response No. 10, Trip Generation.

Comment No. 16-81

- **Do driveways provide adequate queuing space? (p. II-driveway diagram)**
- **TDM has not been effective in LA. This project relies on it (p. II-30)**
- **Off-site parking must be covenanted within 700 feet (per LAMC). No leases...**

Response to Comment No. 16-81

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion. As discussed therein, adequate queuing storage would be provided at each Project driveway to minimize the potential for vehicles to spill over into the adjacent arterial streets.

Refer to Sections A, TDM Effects on Trip Generation, and B, Transit and TDM Effectiveness, of Topical Response No. 11, Transportation Demand Management. As discussed in Section A, the VMT analysis in Section IV.K, Transportation, of the Draft EIR and the Transportation Assessment (Appendix M.1 of the Draft EIR) conservatively excluded the effects of the Project's TDM measures. Section B discusses the history of the

effectiveness of TDM in California. As described in Response to Comment No. 16-80 above, the Transportation Assessment underestimates the potential effectiveness of TDM and transit to the Project Site to be conservative; as such, the comment's assertion that the Project "relies" on TDM is not correct. The Project has committed to the TDM Program as Project Design Feature TR-PDF-2 (see pages IV.K-37 to IV.K-40 of the Draft EIR), and it would meet (and be expected to exceed) the goals established by the TDM Ordinance.

Off-site parking is no longer proposed for the Project, as discussed in Topical Response No. 13, Parking.

Comment No. 16-82

- **Water shortage: state declared emergency, city watering regs. Please provide all city regulations regarding water conservation and drought declarations.**
- **Inadequate infrastructure**

Response to Comment No. 16-82

Refer to pages IV.M.1-9 through IV.M.1-14 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR for a discussion of City plans and regulations regarding water conservation and drought conditions, including LADWP's 2020 UWMP, L.A.'s Green New Deal, One Water LA 2040 Plan, and applicable provisions in the City of Los Angeles General Plan and LAMC. The Draft EIR fully and adequately analyzed water infrastructure on pages IV.M.1-31 to IV.M.1-34 and the Utility Report included as Appendix O of the Draft EIR. As stated therein, the Project would not require or result in the relocation or construction of new off-site water facilities or expansion of existing facilities that could cause a significant environmental effect. As such, impacts on water infrastructure would be less than significant.

Comment No. 16-83

- **NPDES permit required** because the excavation will hit groundwater.

Response to Comment No. 16-83

Refer to Response to Comment Nos. 3-7 and 11-5 for additional information regarding compliance with discharge permit requirements.

Comment No. 16-84

- **Clean Air Act lawsuit in federal court** over noncompliance with State and Regional Air Quality Plans, particularly with the additional traffic and hydrocarbon release from excavation. Air quality has been declining, and we are not in compliance with the Clean Air Act. We are a nonattainment area. Need to comply, not make it worse.
- What about diesel fumes wafting over shoppers at the Grove and Farmer's Market.

Response to Comment No. 16-84

This comment does not specify a specific lawsuit regarding the Clean Air Act related to the State and regional air quality plans that pertains to the Project. However, as discussed above in Response to Comment No. 16-12, the Project is not expected to worsen air quality in the region and construction (including emissions related to excavation) as operational localized air quality impacts would be less than SCAQMD's significance criteria for all pollutants. SCAQMD's localized significance thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard.

In response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include diesel exhaust (referred to as diesel fumes in this comment) from trucks and equipment with receptors located immediately south of the Project Site. As discussed in Response to Comment No. 26-E.1-2, the quantitative HRA confirms the Draft EIR's conclusion that health risks from the Project would remain below applicable significance thresholds.

Comment No. 16-85

- No analysis of subsidence, alteration of subsurface flow, pollution with hydrocarbons from oil field and within the La Brea water table.

Response to Comment No. 16-85

The Draft EIR addressed each of the topics mentioned in this comment. As stated in the Geotechnical Addendum II, included in Appendix E.5 of the Draft EIR, the Project Site is not located within an area of known subsidence due to withdrawal of oil or any other fluid. According to the Geologic Map of the Hollywood and Burbank (South ½) Quadrangles, Los Angeles, California (Dibblee, Map DF-30), the Project Site is underlain by Older Surficial Sediments. Due to the age of the sediments, subsidence is not

anticipated for the Project Site soils. As stated on page IV.D-14 in Section IV.D, Geology and Soils, of the Draft EIR and discussed in Response to Comment Nos. 11-5 and 16-74, no permanent large-scale extraction of groundwater, gas, oil, or geothermal energy currently occurs or is planned at the Project Site. Therefore, the potential for ground subsidence due to the withdrawal of fluid or gas at the Project Site is low. As discussed in Response to Comment No. 3-7, no permanent dewatering would be required, and only temporary construction dewatering would occur. Temporary construction dewatering methods will be designed to address the potential for subsidence from the dewatering efforts; refer to the Dewatering Report in Appendix FEIR-13 of this Final EIR. As discussed in Appendix D of the Dewatering Report, the dewatering system methods and shoring design are subject to regulatory control for safety and subsidence and will be submitted to LADBS for review and approval as part of the regulatory building permit process. Refer to Response to Comment No. 11-25 regarding the quantity of groundwater to be extracted during temporary dewatering.

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding hydrocarbons and the Project Site's location within an oil field.

There are no identified impacts to the Project Site groundwater from the oil field. Nevertheless, any petroleum impacts to groundwater that is discharged during the temporary construction dewatering will follow the testing, on-site treatment (if necessary) and off-site discharge requirements contained in the approved discharge permit (either an NPDES permit or an industrial sewer discharge permit). Refer to Response to Comment No. 11-5.

The Project's impact on groundwater flows is discussed on pages IV.G-33 to IV.G-34 of the Draft EIR. As stated therein, excavation for below-grade parking would extend to a maximum depth of 45 feet below grade, and the historic high groundwater level on the Project Site is approximately eight feet below the existing Project Site grade. Therefore, dewatering activities are anticipated during construction as disclosed in the Draft EIR. However, due to the limited and temporary nature of dewatering operations, and with compliance with all applicable regulatory requirements, impacts to regional groundwater levels would be less than significant. Furthermore, no water supply wells, spreading grounds, or injection wells are located at the Project Site or within a one-mile radius of the Project Site that could be impacted by Project construction. Regarding Project operation, the Project Site is currently comprised of approximately 90 percent impervious surfaces, and, as such, limited groundwater recharge occurs. Project buildout would result in up to approximately 90 percent impervious surfaces throughout the Project Site. Furthermore, consistent with LID requirements to reduce the quantity and improve the quality of runoff that leaves the Project Site, the Project would include the installation of stormwater capture and use or biofiltration/bioretenion BMPs as established by the LID Manual. In addition, the stormwater which bypasses the BMP systems would discharge to an approved

discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the rate or direction of groundwater flow. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management, and impacts on groundwater supplies during operation of the Project would be less than significant.

Comment No. 16-86

SP flexibility in locating various uses within the site. But this does not permit analyzing impacts on adjacent properties. NOP p. 14

Response to Comment No. 16-86

The comment is unclear. Nonetheless, the Draft EIR fully evaluates potential impacts of the Project on adjacent properties and other properties in the vicinity of the Project Site as required by CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of the Conceptual Site Plan that was analyzed in the Draft EIR and the regulatory framework under the proposed Specific Plan.

Comment No. 16-87

Helipad

- What are the noise impacts of putting the helipad at a higher elevation? (II-15)
- What are the impacts of this helipad on the Cedars emergency helipad?
- What flight paths will be used?
- Will the helicopters fly over Farmers Market and the Grove?
- Is this a helipad for emergency use or is it a heliport, rather than a helipad?
- Flight path of new helipad? (II-15)
- Frequency of flights? (II-15)
- Conditions of CUP ZA 11412 for helipad. Make sure it's not a heliport.... (II-15).

Response to Comment No. 16-87

As discussed in Response to Comment No. 26-15, the Project would include the continued operation of a helipad in the same general location and in accordance with

applicable regulatory requirements. The only change to the helipad would be its higher elevation.

Raising the helipad to a higher elevation at the same location would increase the vertical distance between helicopter activities (e.g., take-off, taxiing, hovering, final approach, landing) and ground-based sensitive receptors when compared to existing conditions. As a result, all phases of helicopter operations would be at a higher elevation than under current conditions, thereby increasing the attenuation of noise. This would incrementally reduce noise exposure at ground-based sensitive receptors. As such, as discussed on page IV.I-43 in Section IV.I, Noise, of the Draft EIR, noise impacts associated with the use of the helipad would be less than significant.

Continued use of the helipad would not impact the Cedars Sinai emergency helipad located approximately 1.25 miles to the west for two reasons. First, as the location of the on-site helipad would not change, existing flight paths would not be altered. Second, use of the helipad would not increase with development of the Project. As such, the Cedars Sinai helipad would not be affected in any way when compared to existing conditions.

With regard to flights over The Original Farmers Market and The Grove, as the location of the helipad and number of flight operations would not change, existing flight paths would not be altered. As such, any flights to and from the south over The Original Farmers Market and The Grove would not change under the Project.

The helipad would continue to operate in accordance with its existing Conditional Use Permit (CUP) (ZA 11412). It would not include services associated with a heliport (e.g., maintenance, fuel bunkering, fire suppression).

Comment No. 16-88

PROJECT DESCRIPTION:

- ***Executive summary fails to disclose all discretionary approvals required for the project and omits need for variances to measure height and FAR.***

Response to Comment No. 16-88

Section II, Project Description, of the Draft EIR provides a full list of the discretionary approvals required for the Project. As described therein, height and FAR would be regulated by the proposed Specific Plan. Thus, variances are not required.

Comment No. 16-89

- Huge difference in time-frame: **30 months or 20 years** (p. 13). Not a stable project description (p. II-12)

Response to Comment No. 16-89

Refer to Response to Comment No. 9-24 regarding the Project's timeframe. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all the necessary information to provide a thorough analysis of Project impacts in accordance with CEQA.

Comment No. 16-90

- p. II-11: integrate off-site uses. What are the off-site uses? What are the impacts of off-site uses? Are they analyzed?

Response to Comment No. 16-90

As discussed in Response to Comment No. 16-57, there are no off-site uses proposed as part of the Project and off-site parking and haul truck staging are no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Figure 1 depicting the on-site haul truck staging areas has also been included in Appendix FEIR-8 of this Final EIR.

Specifically, the commenter is referring to a Project objective contained in Section II, Project Description, of the Draft EIR. The referenced Project objective describes the design focus of the Specific Plan and its goal of facilitating development of a Project that can lead to better integration with its surroundings. The Project has proposed (among others) an enhanced and more inviting public realm and the relocation of surface parking to subterranean levels to allow for the ability to construct up to 20,000 square feet of publicly-accessible retail uses. The Project objective, as stated, identifies the overarching goal of the Project to enhance the Project Site's frontages and, through that, encourage and provide opportunity for on-site staff, employees, and guests to walk or bike to locally adjacent uses, such as restaurants, retail, and sundry stores.

Comment No. 16-91

- Show route of employee shuttles (p. II-11)

Response to Comment No. 16-91

As described on page IV.K-38 of the Draft EIR, the Applicant will either operate or fund an employee van or shuttle service between the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project Site.

Comment No. 16-92

- Signs visible from public right-of-way?? (p. II-11)

Response to Comment No. 16-92

Refer to Response to Comment No. 5-10 regarding the externally visible signs associated with the proposed Sign District.

Comment No. 16-93

- *Any tax relief in the development agreement?* (p. II-12)

Response to Comment No. 16-93

This comment does not concern the Draft EIR's analysis of the physical environmental impacts of the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-94

- No there-there: guidelines, concepts used to evaluate proposals. Really? Where are these? (II-12)

Response to Comment No. 16-94

It is not clear what this comment is referring to. This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required.

Comment No. 16-95

- Where is the regulatory framework? (II-12)

Response to Comment No. 16-95

It is unclear what regulatory framework the commenter is referring to, but the regulatory framework underpinning both the Specific Plan and environmental analysis is included.

As stated on page II-12 in Section II, Project Description, of the Draft EIR, the proposed Specific Plan would create a regulatory framework that accounts for the special needs of the Project Site and provides the Applicant with flexibility to address potential future changes in technology and space requirements inherent to the rapid pace of entertainment technology's advancement. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. Although not necessary for evaluation of the Project, in response to comments the Preliminary Draft Specific Plan has been made publicly available for informational purposes and can be found on City Planning's website page for this Project.

The regulatory framework relevant to each of the environmental topics studied in the Draft EIR is provided in Section 2, Environmental Setting, of each of the Draft EIR sections.

Comment No. 16-96

- Create a new land use zone: TVC (p. II-12). Why is this required to obtain an increase in FAR?

Response to Comment No. 16-96

The Project Site currently derives its FAR limit from the underlying C2-1-O and C1.52D-O Zones. Height District 1 and 2D both limit the Project Site's FAR to 1.5. The purpose of the TVC Zone is to implement the proposed Specific Plan as the regulatory control document applicable to the Project Site. Instead, the FAR and allowable floor area will be codified within the rules and regulations of the adopted Specific Plan. As stated previously, though not approved by the City, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website.

Comment No. 16-97

- How do you convert production office space to basecamp/parking? II-13 Footnotes c, d)
- How do you convert garages into "other uses?"

- Flexibility of uses on the site is not what a specific plan does: it locates the uses in the most beneficial and compatible way. (II-13)
- There is no prohibition now to develop office and studio uses. The only limitation is the FAR. Why is the specific plan even needed if these uses are already permitted?

Response to Comment No. 16-97

Footnote c. of Table II-2 on page II-13 of Section II, Project Description, of the Draft EIR states that an estimated 6,608 square feet of existing production office space would not be demolished but may be converted to basecamp or parking uses. Footnote d. of Table II-2 states that an estimated 36,068 square feet of existing general office space would not be demolished but may be converted to basecamp or parking uses. These conversions would occur at grade level using typical construction techniques that would open up these areas for this use. Such conversions would be permitted through the City of Los Angeles Department of Building and Safety. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project is proposing a Land Use Exchange Program to allow for limited flexibility in the size of the studio uses (increases permitted only to sound stages and production support uses), but the total floor area throughout the Project Site would not exceed 1,874,000 square feet.

The comment regarding conversion of garages is unclear and does not appear to be raising a question specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the purpose of the proposed Specific Plan and the limited flexibility it provides.

Comment No. 16-98

- Analysis required for impact on MP 2035 changing the designation from Mixed-Use to TVC zone.

Response to Comment No. 16-98

The Mobility Plan does not designate the property as a Mixed Use Boulevard. The Mixed-Use Boulevard designation is identified within both the Framework Element of the City of Los Angeles General Plan and the Wilshire Community Plan as a tool to stimulate vibrancy and activity. Further, a Mixed-Use District has not been adopted. It has only been identified as an item that the Department of City Planning supports for areas within the

Wilshire Community Plan. Please refer to Response to Comment No. 16-2 for further elaboration on Mixed Use Boulevards in the General Plan Framework Element.

Additionally, the zoning designation is proposed to change from the C1.5 and C2 Zones to the TVC Zone and assign the TVC Zone to an area of unincorporated County of Los Angeles to be annexed by the City of Los Angeles. Refer to pages IV.K-46 through IV.K-57 of Section IV.K, Transportation, and pages 11 through 14 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR for a discussion of the Project's consistency with the Mobility Plan.

Comment No. 16-99

- Residential density for Regional Center is R5 if they change their minds and ask for a change in use from the Director of Planning. This is like the high-rise Wilshire Corridor in Westwood.

Response to Comment No. 16-99

Refer to Response to Comment No. 16-73 regarding how no changes to the allowable residential density would occur as a result of the Project.

Comment No. 16-100

- Area not designated in GPF as a regional center. Requires meeting the mandatory mitigations of Policy 3.3.2 discussed above.

Response to Comment No. 16-100

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation.

Comment No. 16-101

- p. II-16 references change in use to be determined by the Director of Planning and no mention of public hearings and required findings. Changing a specific plan requires a new specific plan amendment, not an administrative review. It is a legislative approval, not administrative fiat.

Response to Comment No. 16-101

Page II-16 in Section II, Project Description, of the Draft EIR does not discuss changes of use; rather, page II-16 discusses the proposed Land Use Exchange Program under the proposed Specific Plan and not a specific plan amendment. As stated on pages

II-16 to II-17 of the Draft EIR, “[s]pecific proposals for development that involve a land use exchange would require a review by the Director of the Department of City Planning. This process would entail a determination of whether the development proposal complies with the TVC Specific Plan regulations and mitigation measures set forth in the Mitigation Monitoring Program for the Project and whether the environmental impacts resulting from the proposed development would be within the envelope of impacts identified in this Draft EIR.” The process discussed in the Draft EIR language above is set forth in the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning’s website. As stated therein, any future development proposal that involves a land use exchange and substantially complies with all applicable Specific Plan regulations would require a discretionary Project Compliance approval pursuant to LAMC Section 11.5.7[13B.4.2] and future CEQA compliance review. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of the Land Use Exchange Program and the procedures under the proposed Specific Plan.

Comment No. 16-102

CONCLUSION

A Supplemental EIR is required to provide the requested information, based on a Draft Specific Plan and a Draft Development Agreement.

Fix The City had requested 30 days additional comment period. With only the 15-day extension, there has not been time to edit this letter to eliminate redundancies.

Response to Comment No. 16-102

The comment incorrectly states that a supplemental EIR is required. Under CEQA, a subsequent or supplemental EIR is only required if one or more of the following events occur:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.¹²⁶

None of these criteria apply to the Project. The Draft EIR was completed in full compliance with CEQA. As demonstrated in the response to comments to this and other comment letters received regarding the Draft EIR, there are no new significant environmental impacts or any substantial increases in the severity of any significant environmental impacts that result from these comments. As such, a supplemental EIR is not required under CEQA. Further, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. While neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR, in response to comments, the Preliminary Draft Specific Plan has been made publicly available and can be found on the Department of City Planning's website page for this Project. A draft Development Agreement will be publicly available prior to the public hearings for the Project. In addition, as set forth by CEQA Guidelines Section 15105, the public review period for a Draft EIR should not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. The Department of City Planning extended the original Draft EIR comment period (45 days from July 14, 2022, to August 29, 2022) by 15 days, until September 13, 2022, for a total comment period of 60 days. Following the publication of this Final EIR, the EIR and the Project's requested approvals will be considered during public hearings and meetings before City decision-makers, including the City Hearing Officer and Deputy Advisory Agency, the City Planning Commission, the Planning and Land Use Management Committee, and the City Council.

Comment No. 16-103

Attachment A. Figure 3-1, Long Range Land Use Diagram, General Plan Framework.

Attachment B. Chapters 2.10 and 2.11, GPF FEIR.

Attachment C. General Plan Framework.

Attachment D. General Plan Framework FEIR.

¹²⁶ Public Resources Code Section 21166.

Attachment E. General Plan Framework Statement of Overriding Considerations which define adequacy for police and fire services and provide “Mitigation Through Policy,” which prohibits increases in density if police or fire services are not adequate and the city cannot afford to make them adequate.

Attachment F. Notice of Determination for General Plan Framework indicating that mitigations are mandatory.

Attachment G. LAFD Dispatch Center Map

Attachment H. Judge Alan Goodman decision, HCPU.

Attachment I. Wilshire Community Plan

Attachment J. 26,000 pages of city records showing inadequate infrastructure and public services.

Attachment K. Fire Response Time Studies And Reports

1. LA County Grand Jury Report on Slow Fire Response Times (<http://documents.latimes.com/l-county-grand-jury-audit-lafd-response-times/>)
2. LA Controller’s report on Slow Fire Response Times (<http://documents.latimes.com/lafd-data-controversy/>)
3. LAFD Annual Strategic Plan, 2020, 2021, 2022 show deteriorating response times. <https://www.lafd.org/about/about-lafd/strategic-plan>
4. LAFD response times are presented for first-in stations as average response time and not the benchmark performance metric of 90% within 5 minutes for medical emergencies and 5 minutes 20 seconds for fire service. See FireStatLA.org (<http://www.lafd.org/fsla/stations-map>)

Response to Comment No. 16-103

This comment provides an attachments and references list for the various comments in this letter. These attachments were reviewed and responded to as appropriate in connection with the response to the comments above.

Comment Letter No. 17

Brian Larrabee
Executive Director
Good City Mentors

Comment No. 17-1

Located in the heart of Los Angeles, Television City is one of LA's most iconic studios. Maintaining its 70-year historic presence is important to me, which is why I was pleased to learn that the project team worked with the Los Angeles Conservancy on its preservation plan.

Not only is the TVC 2050 project committed to preserving the historic cultural monument onsite, but they've also restored and preserved the public viewshed along Beverly Boulevard. One of the project's key planning principles, was to honor the original architects' intent for the studio—to have the ability to grow and adapt to changing industry needs.

TVC 2050 will allow the flexibility to accommodate ever-changing production and technological needs. The specific mix of uses ultimately constructed will depend on market demands. Having that flexibility is critical to the studio's longevity.

This modernization effort will allow Television City to keep up with industry demands, maintain a wonderful landmark and preserve our entertainment industry legacy.

Response to Comment No. 17-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 18

Michael Patterson
Business Manager
Heat & Frost Insulators Local 5
P.O. Box 3160
Ontario, CA 91761-0916

Comment No. 18-1

On behalf of Local 5 of the International Assn. of Heat & Frost Insulators & Allied Workers, we want to express our strong support for the TVC 2050: The Los Angeles Studio Plan proposed project.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city 's biggest industries and it will produce new, well-paying construction jobs. Television City has agreed to employ union construction workers for the project which means new job opportunities for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 18-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 19

Brian Curran
Hollywood Heritage, Inc.
P.O. Box 2586
Hollywood, CA 90078-2586

Comment No. 19-1

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee, and its members, thank you for the opportunity to review and comment on The Television City 2050 Draft Environmental Impact Report (DEIR).. [sic] This includes the Appendix C.1 Historic Resources Technical Report TVC 2050 Project by Historic Resources Group.

Our review of the DEIR addresses a central issue: that the DEIR is stated as analyzing a Specific Plan as the “Project”, yet that Specific Plan was not included for DEIR review. Our interest is in preservation, rehabilitation, and additions to the existing historic buildings and the compatibility of new construction with them. We see that considerable effort has gone into this issue, but the “Project” and the DEIR does not connect the dots. Implementation in the Specific Plan and future environmental review is not guaranteed or clear. We hope to hear how and when the Specific Plan will be available to the public and circulated for our comment, prior to your preparation of the FEIR.

Response to Comment No. 19-1

Refer to Response to Comment No. 5-3 regarding the Project Description and Specific Plan. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how all physical aspects of the Project, including the proposed Specific Plan, were fully disclosed and analyzed in the Draft EIR. As discussed in Topical Response No. 1, the Specific Plan is not necessary for evaluation of the Project. Nevertheless, in response to comments, the Preliminary Draft Specific Plan has been made publicly available and can be found on City Planning’s website for this Project. Please note that the Preliminary Draft Specific Plan incorporates the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

Comment No. 19-2

Project Presentation and Illustrations: Hollywood Heritage was fortunate to have a presentation August 10th from the developer, the design team, and the historic architectural consultants. It is evident that much effort is going into retaining the historic

Primary Studio Complex and in making new building designs compatible. The illustrations we saw showed new buildings sited to the sides of the CBS “Service” and “Studio” [sic] Buildings, respecting the Beverly Boulevard “viewshed” to these historic buildings. The designers had tried many successive concepts over time, with an increasing sensitivity to historic structures and a solid grasp of studio function.

Response to Comment No. 19-2

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 19-3

Our overall impression is quite positive. But designers and intentions can change over the 20 year horizon this EIR is expected to cover.. [sic] (We do not agree on allowing additions *a priori* to the top of the Primary Studio Complex without having actual detailed plans to review and concurrence by the Office of Historic Resources..) [sic] Hollywood Heritage looks forward to continuing involvement in the buildings’ restoration and the compatible new construction as the actual Specific Plan gets written, the EIR gets recirculated, and more detailed plans are presented.

Response to Comment No. 19-3

The historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. In response to comments on the Draft EIR, the proposed Specific Plan has been made publicly available prior to the publication of this Final EIR, which can be accessed on the Department of City Planning’s website. Please note that this draft is not final and has not been approved by City decision-makers. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the potential impacts from any rooftop addition were thoroughly analyzed in the Draft EIR (see page IV.B-50 in Section IV.B,

Cultural Resources, of the Draft EIR) and Historic Report (see Appendix C.1 of the Draft EIR, pages 65 to 68), and the Draft EIR correctly concluded that impacts from any rooftop addition would be less than significant.

Regarding the comment about the 20-year horizon, as stated on page II-36 in Section II, Project Description, of the Draft EIR and throughout the Draft EIR, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and Mitigation Monitoring Program throughout the term of the Development Agreement. The Specific Plan and Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable PDFs and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. In addition, as discussed above and in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR discloses all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. Please note that the Preliminary Draft Specific Plan incorporates the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 19-4

“PROJECT” IS A SPECIFIC PLAN, NOT YET WRITTEN

Unfortunately the DEIR Project Description includes none of the building designs, site plans, drawings or good design we saw and would have been able to evaluate as part of our DEIR review. The “Project” is the Specific Plan, not buildings. This DEIR concludes “no significant adverse effect” on Cultural Resources, based on an analysis of 4 highly schematic drawings on pages 120-125 in Appendix C1.(Cultural Resources). While providing a detailed professional analysis of this plan in the DEIR 3 important issues arise:

1. these buildings may or may not be what the actual Specific Plan ultimately entitles;
2. OHR is always relied on to perform design review of the rehabilitation, demolitions, additions, and maybe the compatibility of neighboring on-site structures. But in this case it appears the Specific Plan will reduce OHR oversight entitling additions and new building “envelopes” as a part of zoning, without OHR input.
3. the Historic Structure Report has not yet been prepared

In other words, the Project Description is inadequate under CEQA, because the “project” is a Specific Plan which is not yet written, publicly circulated, and accepted.

Response to Comment No. 19-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 19-3 and 5-3 regarding the proposed Specific Plan and how CEQA and City policy do not require a draft Specific Plan to be included as part of a Draft or Final EIR. Also refer to Response to Comment No. 19-3 regarding the discretionary review process that would be followed under the proposed Specific Plan in the event there are any substantial changes from the Project evaluated in the EIR.

With regard to OHR input and the HSR, as discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to LAMC Section 22.171.14. Section B of the topical response also presents a discussion of why CEQA and City regulations for the treatment of designated HCMs, as well as the standard purpose and use of an HSR, do not require the completion of the HSR before the Project EIR is approved.

Comment No. 19-5

An FEIR cannot be completed for this entitlement process until the Specific Plan itself has been circulated and reviewed by the public. Or until Mitigation Measures are added which make all the referenced inclusions in the EIR mandatory which are used to arrive at the conclusion of “no significant adverse effect”. [sic]

- The “SP” is the actual entitlement action this DEIR supports.
- As presented, we find the pronouncements of what “would” be included in the Specific Plan as conjectural, and not sufficient enough to ensure compatible design of additions and future buildings.

- We see the proposed Specific Plan building heights and setbacks as reducing the ability of the Office of Historic Resources to review additions and alterations of even the Primary Studio Complex as they are presented.
- If historic review is going to be pre-approved as suggested within this EIR, then the Cultural Heritage Commission should have the opportunity now to review the Specific Plan in detail before losing their ability to see actual building plans and approve or disapprove.

When the Specific Plan is available for the public to review, or when Mitigation Measures are added, then there will be a verifiable basis for the Project Description and the environmental findings.

Response to Comment No. 19-5

Refer to Response to Comment Nos. 19-3 and 5-3 regarding the proposed Specific Plan and how CEQA and City policy do not require a draft Specific Plan to be included as part of a Draft or Final EIR. In addition, refer to Response to Comment No. 19-3 regarding the discretionary review process that would be followed under the proposed Specific Plan in the event there are any substantial changes from the Project evaluated in the EIR. Refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding OHR input and how any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to LAMC Section 22.171.14.

As discussed in Response to Comment No. 9-18, the proposed Specific Plan includes historic preservation regulations that incorporate the same LAMC regulations and PDFs set forth in Section IV.B, Cultural Resources, of the Draft EIR and specific standards regarding the Viewshed Restoration Area. Refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website.

The Draft EIR comprehensively evaluated historic impacts in Section IV.B, Cultural Resources, of the Draft EIR, and concluded that impacts would be less than significant. Thus, mitigation is not required as incorrectly asserted in this comment.

Comment No. 19-6

HOW EIR AND SPECIFIC PLAN ARE PROCEDURALLY DISCONNECTED

The Specific Plan is the "Project". A [sic] conclusion of "No Significant Adverse Effect" on Cultural Resources isn't supportable unless the dots are connected. The intents here are laudable, and the design and consultant work to date is laudable, but the missing Specific

Plan and missing “‘follow through’ for project design features undermines the intent. The EIR conclusions are thus unsupportable.

Specific Plan contents as described are very basic zoning concepts: In the DEIR Project Description Page II-12 to 23 we are seeing very standard abstract zoning concepts to regulate future buildings—allowable square footage (with a new definition); heights, uses, setbacks applied across the 25 acre land area as a whole—to be tracked over time.. [sic] These are large scale abstract allowable “building envelopes”—far from specific and precise for evaluating a rehabilitation plan or the compatibility of new construction.

This Specific Plan “zoning’ is written to allow this developer flexibility going forward, and there is nothing wrong with that—IF each step of the way rehabilitation and additions to the historic buildings, and compatibility of new construction with historic buildings, is ensured. In the section of the DEIR called “Design and Architecture.” Design and Architecture .are [sic] missing. Compatibility and adequate rehabilitation goes beyond basic zoning “envelopes”. [sic]

Response to Comment No. 19-6

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how CEQA and City policy do not require a draft Specific Plan to be included as part of a Draft or Final EIR, and how the Project Description in Section II, Project Description, of the Draft EIR is accurate, stable, and finite and provides all of the necessary information to provide a thorough analysis of Project impacts in accordance with CEQA.

As discussed in Response to Comment No. 9-18, the proposed Specific Plan includes historic regulations that incorporate the same LAMC regulations and PDFs set forth in Section IV.B, Cultural Resources, of the Draft EIR.

As discussed in Response to Comment No. 19-8, all PDFs have been included in the Mitigation Monitoring Program for the Project included as Section IV of this Final EIR to ensure their implementation.

In addition, refer to Response to Comment No. 19-3 regarding the discretionary review process that would be followed under the proposed Specific Plan in the event there are any substantial changes from the Project evaluated in the EIR. With implementation of the PDFs, LAMC requirements, and procedures within the Preliminary Draft Specific Plan, compatibility of new construction with the HCM would be ensured.

With regard to the comment regarding design and architecture, the discussion on pages II-17 through II-22 of Section II, Project Description, of the Draft EIR does provide an overview of the design and architecture of the Project and includes a discussion of how the design is intended to be compatible with the architectural elements of the HCM, as well as a description of height zones, frontage areas, building stepbacks, and other design elements, such as screening and fencing. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, more detailed design information is not necessary for the CEQA environmental analysis of the Project.

With regard to the comment regarding “envelopes,” refer to Response to Comment No. 9-12.

Comment No. 19-7

First procedural disconnect: The promise is that the Specific Plan “would” require the following. “Would” is not “shall”. [sic] Also, producing these items is not adequate: they must be requirements of the Specific Plan or Mitigation Measures that are monitored. But also the process of how the actual reduction of potential adverse impact will be done must be delineated—HOW the Specific Plan will require these activities; HOW they will be evaluated by professionals and the public; and HOW the review will be accepted or not.

- an Historic Structure Report
- preservation of the Primary Studio Complex
- demolition of everything else
- submissions of building plans to OHR .
- review by the Director of Planning of work in the “viewshed”

Response to Comment No. 19-7

Potential impacts on historical resources were comprehensively analyzed in Section IV.B, Cultural Resources, of the Draft EIR, and the Draft EIR concluded that impacts from demolition, alteration, and new construction associated with the Project would be less than significant. Note that the City uses the term “would” when discussing a project in its environmental documents to reflect the fact that the project has not been approved by the decision-maker(s). If approved, all of the regulations within the proposed Specific Plan must be implemented. Refer to Response to Comment No. 19-3 regarding the discretionary review process that would be followed under the proposed Specific Plan in the event there are any substantial changes from the Project evaluated in the EIR (including new structures proposed in and around the HCM and Viewshed Restoration

Area that materially differ from the Conceptual Site Plan). Also refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding how any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to LAMC Section 22.171.14. Note that all PDFs and mitigation measures within the Draft and Final EIR have been included in Section IV, Mitigation Monitoring Program, of this Final EIR. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the regulations and procedures for new construction in the Viewshed Restoration Area and restoration of the historic viewshed along Beverly Boulevard.

Comment No. 19-8

Second procedural disconnect:, [sic] Specific Plans usually have development regulations and standards, with clear Design Review procedures mandated, including publicly noticed Board reviews of design.

IThis [sic] DEIR offers “Project Design Features” on Page I-16. These PDFs are usually attached to entitlements actions for proposed building projects—not for a Specific Plan with maximized flexibility for 2 million square feet of construction., [sic]

These Project Design Features and Project Parameters are the advice of a qualified preservation consultant in Appendix C-1. They are intended to delimit the wider flexibility of the future Specific Plan. It is not clear how and whether they are a part of the Specific Plan, or how they will be adjusted if the developer changes from the schematic design analyzed in the Appendix.. [sic]

- **“Project [sic] Design Feature CUL-PDF-1** Project Parameters includes the following, and references illustrations in the Historic Resources Technical Report: (Appendix C1). There is also a full list and discussion in Appendix C1.
- **Rehabilitation of the Primary Studio Complex** (This is stated in the EIR to involve review by OHR According to Appendix C, the historic resource would be retained and rehabilitated based upon the Secretary of the Interior’s Standards for Rehabilitation, the Rehabilitation Standards.
 - **Rooftop Addition above the Primary Studio Complex** (This should involve review by OHR, but OHR will be hobbled-in-advance by “permissions’ [sic] granted in the zoning heights and the verbiage of the roject [sic] Design Features.)
 - Adjacent New Buildings (Role of OHR unclear.)
- **“Project [sic] Design Feature CUL-PDF-2** Historic Structure Report required.

For example, the consultant's Project Parameters seem to be addressing a particular design, while the Specific plan has flexibility.

- Directives like “ Remove [sic] up to two bays of the Studio Building's west wall to allow an interior east-west passage through the Primary Studio Complex”. [sic] delimit the ability of OHR to evaluate a project as a whole.
- The “viewshed” is referred to in the Appendix C1—but its implementation is unclear.
- Without mandatory professional review and monitoring, and without public review of the specifics, the words are open to wide interpretation and unclear enforcement.. [sic] but are insufficient for clearing all possible cultural resources environmental impacts.

Response to Comment No. 19-8

Refer to Topical Response No. 5, Historical Resources, specifically Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, regarding preservation of the Primary Studio Complex and regulatory procedures; Section C, Potential New Construction North of the Primary Studio Complex, regarding potential new construction in the Viewshed Restoration Area; and Section D, Analysis of Impacts to the Primary Studio Complex.

As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR analyzed the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review.

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Project Parameters are required to be implemented by Project Design Feature CUL-PDF-1 and are not the “advice” of a consultant. All PDFs have been included in the Mitigation Monitoring Program for the Project included as Section IV of this Final EIR to ensure their implementation. The Mitigation Monitoring Program has also been appended to the Preliminary Draft Specific Plan. Any substantial alteration to a designated HCM would require OHR review for compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance. It should be noted that OHR staff is responsible for reviewing alterations to properties designated as HCMs to ensure they meet the Secretary of the Interior's Professional Qualification Standards. Thus, the involvement of a Historic Preservation Professional is not mandatory but voluntary. The proposed Specific Plan

would not supersede the Cultural Heritage Ordinance and would not hinder the ability to OHR review alterations to the Primary Studio Complex. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the regulations and review process for new construction in the Viewshed Restoration Area.

The comment that the Specific Plan maximizes flexibility for 2 million square feet of new construction is incorrect. As stated throughout the Draft EIR, the proposed Specific Plan would permit a maximum of 1,874,000 square feet of floor area within the Project Site. The proposed development program analyzed in the Draft EIR includes 350,000 square feet of sound stage, 104,000 square feet of production support, 700,000 square feet of production office, 700,000 square feet of general office, and 20,000 square feet of retail uses. The proposed Specific Plan would also include a Land Use Exchange Program to allow for limited increases in sound stage and production support uses with a corresponding reduction in square footage from another permitted land use as discussed further in Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 19-9

Third procedural disconnect: The Parameters and Project Design Features must be formally reviewed and accepted by the Cultural Heritage Commission and OHR before they relinquish their “normal” authority. The zoning “envelopes” of allowable additions and new buildings must be vetted.. [sic] OHR will still need to address compatibility of height, materials, style, etc.

Project Design Features—if somehow attached to a Specific Plan in the future—still carry less legal weight than Mitigation Measures. The EIR somewhere mentions how to amend Character-Defining Features without the requisite public involvement at the Cultural Heritage Commission or through an EIR process.

An EIR like this is rarely adequate for future implementation of such a large project with so many variables. An EIR can put into motion a set of further professional and public reviews at such a time as actual project plans are available—often at 25%, 50%, and 75% construction documents. Unmonitored and unreviewed, these are hollow promises.

Response to Comment No. 19-9

This comment discusses the Cultural Heritage Commission and OHR’s review of the PDFs and certain elements of the Project. However, this is not a comment on the Draft EIR’s analysis of the Project’s physical impacts on the environment. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

This comment states that PDFs carry less legal weight than mitigation measures. However, enforcement of the EIR's PDFs and mitigation measures would be ensured through the City Council's adoption of the Mitigation Monitoring Program for the Project as part of its certification of the EIR and approval of the Project. Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." Therefore, if the Project is approved, there will be a detailed plan in place to ensure monitoring and enforcement of all of the EIR's PDFs and mitigation measures. Note that all PDFs and mitigation measures within the Draft and Final EIR have been included in Section IV, Mitigation Monitoring Program, of this Final EIR.

This comment also discusses amending the character-defining features without the requisite public involvement. However, the Project would not amend the character-defining features of the Primary Studio Complex. The character-defining features are set forth in the findings that were adopted as part of the HCM designation, included as Appendix C of the Historic Report, which is included as Appendix C.1 of the Draft EIR. Per Project Design Feature CUL-PDF-1, the Project will preserve the existing character-defining features of the Primary Studio Complex and restore those character-defining features, which, in some cases, have been compromised in the past (prior to the Project), as stated on page IV.B-38 in Section IV.B, Cultural Resources, of the Draft EIR. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to LAMC Section 22.171.14. As discussed in Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, per the proposed Specific Plan, any proposed modification to character-defining features would require submittal to the Director, in consultation with OHR, of written verification from a Historic Preservation Professional that the modification complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Lastly, this comment states that an EIR like this is rarely adequate. As described in Section 15121 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, as discussed on page I-1 in Section I, Executive Summary, of the Draft EIR, the purpose of the Draft EIR is to focus the discussion on the Project's potential environmental effects that the City, as the Lead Agency, has determined to be, or potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts. In accordance with CEQA, the Draft EIR serves as the environmental document for all actions associated with the Project. Also, the proposed

Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. See the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website. The Draft EIR is a "Project EIR," as defined by Section 15161 of the CEQA Guidelines. Furthermore, the Draft EIR complies with Section 15064 of the CEQA Guidelines, which discusses determining the significance of the environmental effects caused by a project.

Comment No. 19-10

ALLOWABLE ROOFTOP AND OTHER ADDITIONS TO THE PRIMARY STUDIO COMPLEX

The historic consultant analyzes some proposals for adding to the current Cultural Heritage Monument Primary Studio Complex buildings and the proposed Specific Plan allows tall building above and in the vicinity of the Primary Studio Complex. The list is called "Rooftop Addition above the Primary Studio Complex". [sic] It interfaces with the list "Rehabilitation of the Primary Studio Complex."

While the consultant has found the proposals to be acceptable and has outlined specific limitations in the Project Parameters, Hollywood Heritage felt that these "additions" to the building are not in keeping with Preservation Brief #14, are not reversible, are not architecturally and structurally developed enough to evaluate, and may be larger and more problematic if and when the project is re-designed. A specific Mitigation measure should be added to require OHR or Cultural heritage Commission and public review of these additions at both a Schematic and a Construction Documents phase.

Response to Comment No. 19-10

Contrary to the claims of the commenter, the proposed Specific Plan does not allow for tall buildings "above" the Primary Studio Complex. Any rooftop addition to the Primary Studio Complex must be designed in conformance with Project Design Feature CUL-PDF-1, which limits the size and scale of any potential rooftop addition so that the integrity of the Primary Studio Complex is retained. Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for further information regarding the preservation of the Primary Studio Complex.

The commenter states that the potential rooftop addition and new construction on the Project Site are not in keeping with Preservation Brief #14 but does not provide any

analysis as to why this might be the case. Preservation briefs were developed by NPS to assist with the interpretation of the Rehabilitation Standards. Neither the preservation briefs nor the Rehabilitation Standards are prescriptive but rather guidelines for managing the alterations and additions to historic buildings to protect their character. As noted in the Historic Report (Appendix C.1 of the Draft EIR), Preservation Brief #14 states, in part, that “a new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building.” As detailed in the Draft EIR (Draft EIR page IV.B-50) and Historic Report (pages 65–68), any rooftop addition would be consistent with Preservation Brief #14 guidance and could be engineered to be technically “reversible.” Any actual design, however, would require additional design and engineering development for permitting purposes as well as review by OHR. For more information on the Project’s compliance with the Rehabilitation Standards, refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources.

Regarding the comment that additions to the Primary Studio Complex may be larger and more problematic, refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources. As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review.

Regarding the comment that a specific mitigation measure should be added to require OHR or Cultural Heritage Commission and public review of these additions at both a schematic and a construction documents phase, CEQA does not require mitigation measures when impacts would be less than significant. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance. Further, the Draft EIR correctly concluded that impacts to the Primary Studio Complex would be less than significant. Therefore, a mitigation measure is not necessary or required under CEQA.

Comment No. 19-11

BACKGROUND

Significance:

- Current listing: Historic-Cultural Monument.# 1167 (2018, CHC-2018-476-HCM)

- Eligibility: Survey LA found the site to be eligible as a 3S;3CS;5S3. SurveyLA did not distinguish the primary Studio Complex—the entire site is a single lot.

Eligibility: [sic] EIR found the site eligible for the National Register

Response to Comment No. 19-11

The information in this comment is provided in Section 7.1, Previous Evaluations and Designations, of the Historic Report (page 33 of Appendix C.1 of the Draft EIR). Refer to Response to Comment No. 19-12, below, regarding the comment that the entire site is eligible.

Comment No. 19-12

Amendment and Treatment of Primary Studio Complex:

- The Cultural Heritage designation applies to the site as a whole, based on customary procedures of the City of Los Angeles. However, an amendment to the nomination created a “Primary Studio Complex”, [sic] and the only Character-Defining Features listed and acknowledged were within those original Studio and Service buildings.
- The Amendment created a “Viewshed” so that these buildings could be seen from Beverly Boulevard.
- The designation points out:. “the purpose of the designation is to prevent significant impacts to an Historic-Cultural Monument through the application of the standards set for th [sic] in the LAAC (e.g. [sic] Sec 22.171.14). Without the regulation imposed by way of the pending designation, the historic significance and integrity of the property could be lost through incompatible alterations and new construction and the demolition of an irreplaceable historic site/open space.”
- Period of Significance: not found in the HCM, but stated in the EIR as [sic] 1952–1963

Response to Comment No. 19-12

The commenter’s claim that designation as an HCM “applies to the site as a whole, based on customary procedures of the City of Los Angeles” is incorrect. While this may sometimes be the case, specific aspects of a property considered to be historically significant, as is the case for Television City, are often delineated for designation. For a more detailed discussion, refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources. As discussed therein, the HCM nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. As stated in the HCM Findings that

were adopted as part of the HCM designation, “[t]he CBS Television City proposed Historic-Cultural Monument is limited to the exterior of the original 1952 buildings (the ‘Studio Building’ on the west, and the ‘Service Building’ on the east) and the CBS logo tiles in the main entry lobby and adjacent corridor.” The HCM Findings are included in Appendix C of the Historic Report (Appendix C.1 of the Draft EIR). With regard to the comment regarding the Viewshed Restoration Area, refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the Viewshed Restoration Area that would be provided as part of the Project.

The commenter’s statement that the period of significance for Television City is not found in the HCM is also incorrect. The 2018 Historic Assessment for Television City, which identified the 1952-1963 period of significance, was appended to the HCM nomination for review by the Cultural Heritage Commission as part of the nomination process.

Comment No. 19-13

Alterations include (from the CHM) : [sic] The nomination stated the following, but did not resolve what this meant: “CBS Television City remains largely intact as originally designed on the exterior.

- As intended, the studio wing was expanded by approximately 50% on the west side, toward Fairfax Ave., in the 1970s for a digital studio, but the original exterior materials and appearance were retained as Pereira and Luckman planned.
- The original rehearsal 9 halls on the third level were also converted to studios.
- Overall, it retains a high degree of original physical integrity.
- Among the alterations to the original design, the audience seating pits in studio #31 was filled in to create a flat stage.
- Two lower wing blocks were added on the east side of the building in the 1970s” [sic]

Response to Comment No. 19-13

This comment quotes the HCM nomination for the Primary Studio Complex. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 19-14

Character-defining features include—from the CHM:bullets added [sic] “The subject property is intact and retains a high level of integrity of location, design, materials, workmanship, feeling, and association. [sic]

- Character-defining features of the property include, but are not limited to: its location at the corner of Beverly Boulevard and Fairfax Avenue, with the main building set back and facing Beverly Boulevard; the pilotis at the ground floor; the exterior concourses with railings and angled fin stanchions at the first floor; the central concrete entry bridge CHC-2018-476-HCM 7800-7860 West Beverly Boulevard Page 5 of 5 [sic] with walls, planters, railing, canopy, and metal “X” supports; the glass curtain wall; the projecting planters and shed roof canopy at exterior of the entry lobby; the concrete cladding and corrugated steel decking material; and the tiled wall in the main lobby with the CBS “eye logo.”

Response to Comment No. 19-14

This comment quotes the HCM Findings for the Primary Studio Complex. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 19-15

Entitlements Covered by this EIR: CPC-2021-4089-AD-GPA-ZC-SN-SP

- General Plan Amendment
- Zone Change
- Signs
- Specific Plan
- Unclear what the environmental review is for the Vesting Tentative Tract

Project Description: The [sic] Project is a Specific Plan for property currently developed as CBS Television City, plus additional land area beyond the 25 acre Television City land to the east (and south?) which will be annexed to Los Angeles.

The “original” 25 acre lot is the site of the HCM.

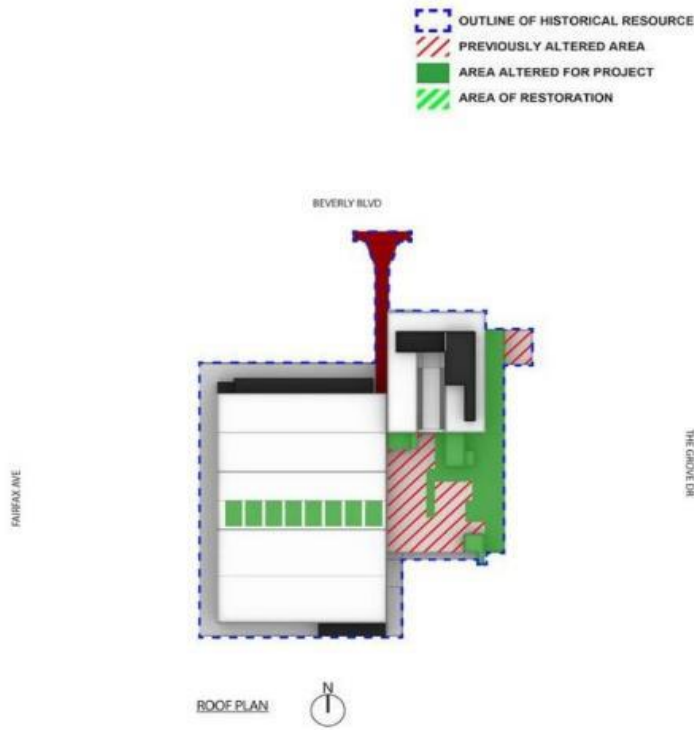
- The DEIR states “The Specific Plan would establish standards to regulate land use, massing, design, and development. [sic] However, the Ordinance and the

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Figure 7: Primary Studio Complex Roof Retention, Removal and Rehabilitation

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Response to Comment No. 19-15

This comment includes a listing of several of the requested approvals for the Project. The full list of approvals is provided on pages II-35 and II-36 of Section II, Project Description, of the Draft EIR. Note that the Draft EIR also covers the CEQA review for the Vesting Tentative Tract Map.

The description of the Project Site in this comment is incorrect. As discussed on pages II-1 and II-2 of Section II, Project Description, of the Draft EIR, the Project Site consists of approximately 25 acres in total, including an approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County to be annexed to the City. The entire Project Site is currently occupied by Television City. Refer to Response to Comment No. 19-12 regarding the area of the Project Site that is part of the HCM designation. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 19-3 and 5-3 regarding the proposed Specific Plan and how CEQA and City policy do not require a draft Specific Plan to be included as part of the Draft or Final EIR.

The comment also provides an overview of the floor area associated with the Project, including the existing floor area to remain and the floor area to be removed, as well as illustrations of the Vesting Tentative Tract Map, Conceptual Site Plan and the Primary Studio Complex. All of these aspects of the Project were fully accounted for in the environmental analysis throughout the Draft EIR, including the analysis of potential impacts to historical resources. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the non-historic Support Building.

Comment No. 19-16

For four decades Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in numerous public policy discussions involving historic resources. These efforts have resulted in the rehabilitation of significant landmarks, landscapes, institutions, and districts in Hollywood.

Response to Comment No. 19-16

The comment provides a general overview of the Hollywood Heritage organization and its involvement in the nomination of historic districts and policy discussions regarding historic resources. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 19-17

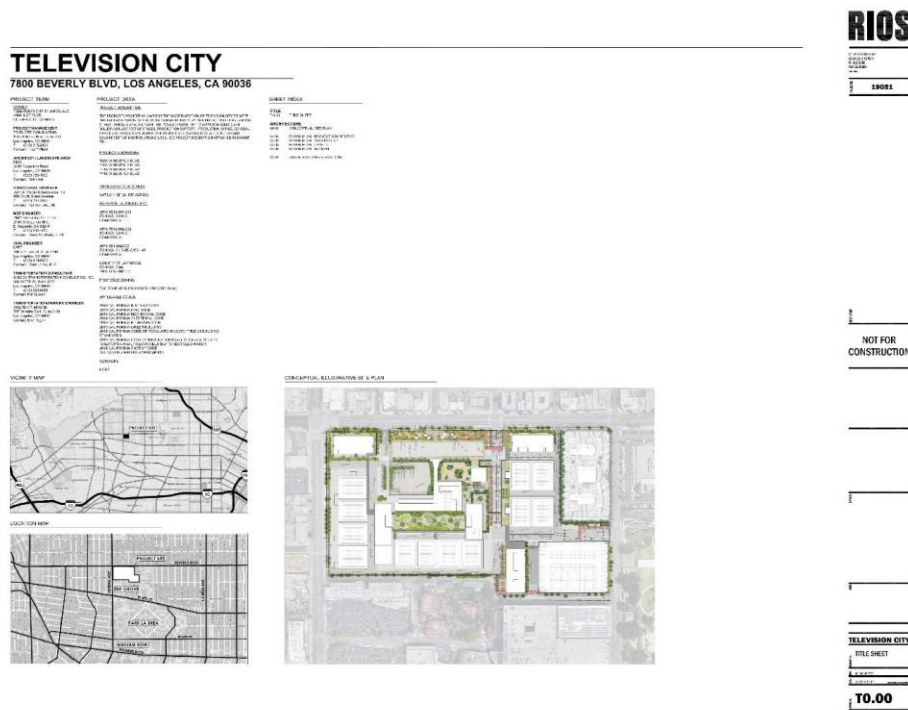
It is great to comment on a project that will extend the useful life of a major historic landmark. And a studio so vital to Hollywood. We look forward to working together to develop a project that benefits the resource, brings jobs and production capabilities to the area, and enhances the public realm.

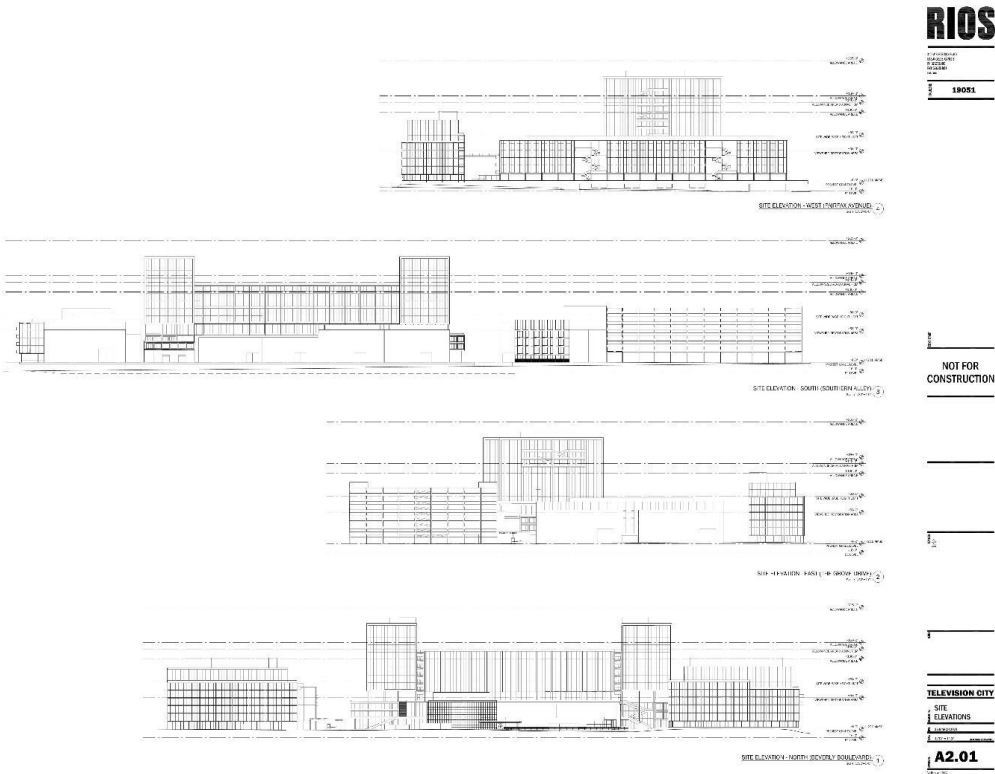
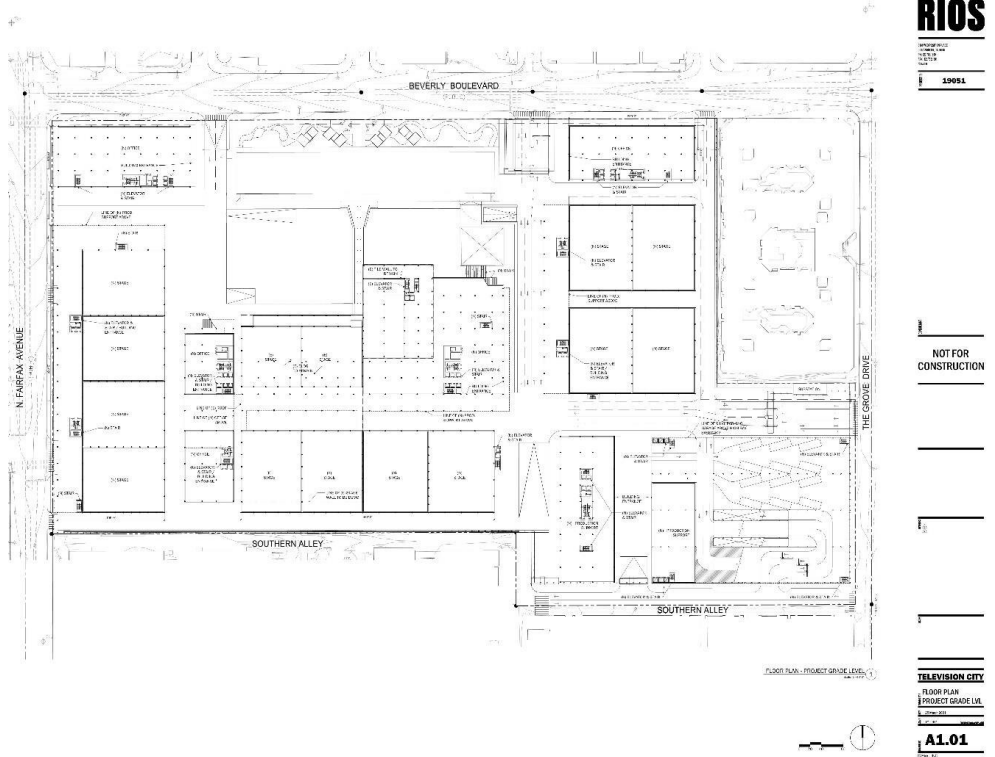
Response to Comment No. 19-17

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 19-18

Attachment #1: Plans in Appendix C1





Response to Comment No. 19-18

This comment consists of selected pages from the Project plan set attached to the Historical Resources Technical Report included as Appendix C.1 of the Draft EIR. Responses related to this attachment have been included in the responses to comments above.

Comment Letter No. 20

Cindy Chvatal
President
Hancock Park Homeowners Assn.
137 N. Larchmont Blvd., #718
Los Angeles, CA 90004-3704

Mark Alpers
Land Use Chair
Hancock Park Homeowners Assn.
137 N. Larchmont Blvd., #718
Los Angeles, CA 90004-3704

Comment No. 20-1

The Hancock Park Homeowners Association (HPHOA) has reviewed the Television City (TVC) Project Specific Plan Draft Environmental Impact Report (Draft EIR) and offers the following comments which were approved by the HPHOA Board of Directors on August 23, 2022.

Response to Comment No. 20-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 20-2**PROJECT VS PROGRAM EIR**

Page I-1 of the Executive Summary describes the document as a “Project EIR” as defined in Section 15161 of the *State CEQA Guidelines*. In our view, this Specific Plan provides a similar level of detail about future development of the site as many Community Plans, approved for many areas within the City of Los Angeles. Therefore, for this reason and those stated below, the analysis of impacts is more like what is found in Program EIRs as defined in Section 15168 of the *State CEQA Guidelines*. Like other Program EIRs, the TVC Specific Plan is a set of rules and regulations that evaluates a program with multiple components that are interrelated geographically. Like other Program EIRs, the document is a higher-level environmental assessment prior to the consideration of individual projects.

As stated in the Draft EIR and on the City's website describing the project, "The Specific Plan would provide development flexibility by allowing for limited exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, additional sound stage uses and/or production support uses may be developed in exchange for a reduction in floor area of another permitted land use category, so long as the limitations of the Specific Plan are met..." The Draft EIR further states that development could occur in one phase as early as 2026 or in multiple phases extending to 2043. Under these circumstances where there is no precise location of specific land uses and the timing is very uncertain, this Draft EIR seems to admit that it is programmatic, rather than project-specific, in nature.

Response to Comment No. 20-2

As discussed on page I-1 in Section I, Executive Summary, of the Draft EIR, the Draft EIR is a "Project EIR," as defined by Section 15161 of the CEQA Guidelines. Furthermore, the Draft EIR complies with CEQA Guidelines Section 15064, which discusses determining the significance of the environmental effects caused by a project.

In practice, the phrase "program EIR" is used to refer to an EIR that presents a higher level of analysis with less detail, generally looking at a broad policy of a planning document, whereas the phrase "project EIR" is used to refer to an EIR that presents a more detailed level of analysis generally focusing on environmental changes caused by a development project including planning, construction and operations. However, the name of the analysis—program or project level—does not ultimately dictate the specificity required in an EIR under CEQA. Instead, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, CEQA Guidelines Section 15146 sets forth the degree of specificity necessary in an EIR, stating that "[t]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." The level of detail included in the Draft EIR complies with CEQA and is consistent with the level of detail in certified EIRs for other projects in the City of Los Angeles.

Moreover, as stated throughout the Draft EIR, construction is anticipated to take place over 32 months. However, the Applicant is seeking a Development Agreement with a term of 20 years, in which case the Project could be built out in multiple phases. The Draft EIR comprehensively analyzed the 32-month buildout scenario as well as the long-term buildout scenario for each environmental topic area in the Draft EIR to provide the most conservative analysis of potential Project impacts.

Comment No. 20-3**VMT CALCULATIONS**

To estimate impacts related to vehicle miles travelled (VMT), the Draft EIR uses the Los Angeles Department of Transportation (LADOT) VMT Calculator, which is based on resident and job density, the availability of transit, and accessibility of biking and walking paths (DEIR, Page IV.A-44). While this methodology is purportedly valid to estimate trip generation from “mixed use sites,” it is in no way, shape or form based on any industry-specific origin/destination studies for the existing project site or other entertainment facilities in Los Angeles. To substantiate (or to revise as necessary) the quantification of these impacts, the Draft EIR should quantify VMT based on the travel patterns of current CBS employees at the project site. If available, other industry-specific data should also be used to substantiate the estimates of VMT-related impacts.

Response to Comment No. 20-3

Refer to Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, for a detailed discussion regarding the appropriateness of using the VMT Calculator for the Project. The comment incorrectly suggests that the City’s VMT Calculator tool is inadequate for the analysis of the Project because it is not based on “industry-specific origin/destination studies.” The VMT Calculator is coded with travel characteristics based on validated data from the City Travel Demand Forecasting Model. It does not compare industries—rather, it compares the relative characteristics of one location with another in terms of relative numbers of residents and jobs, land use density, transportation connectivity, transit availability, surrounding retail and other jobs, vehicle ownership, and household size.¹²⁷

The VMT Calculator is designed to analyze VMT for any land use project that is not customer- or visitor-focused (e.g., retail or entertainment/event center). While production-related facilities are not specifically built into the VMT Calculator’s internal model, it has a Custom Land Use feature that allows analysis of other employment-focused land uses. The Custom Land Use feature requires three inputs: daily trip generation, total employee population (for an employment-based use, such as the Project), and trip purpose assumptions. These three inputs represent the key factors used to calculate work VMT per employee for each employment-based land use built into the VMT Calculator. The Project’s VMT analysis, described beginning on page IV.K-73 of Section IV.K, Transportation, of the Draft EIR, calculated daily Project trip generation rates for the sound stage, production support, and production office uses based on industry-specific data, as

¹²⁷ Los Angeles Department of Transportation, *Vehicle Miles Traveled Documentation Report*, February 2019, pages 2 and 3.

further described in Topical Response No. 10, Trip Generation. Refer to Section A, Empirical Data, of the topical response for a comparison of the rate. Similarly, data from the Draft EIR technical team's experience with production studios in Southern California were used to inform employment estimates that went into the Custom Land Use function. These studios include NBCUniversal, Paramount Picture Studios, and studio complexes in Hollywood, Downtown Los Angeles, and Culver City. Trip purposes were based on office uses as studio employees have similar daily travel characteristics between home and work (which is the type of trip that forms the basis of the work VMT per employee metric). Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled.

Comment No. 20-4

HISTORIC PRESERVATION

In addition to the Main Studio Complex on the project site, there are five designated Los Angeles Historical Cultural Monuments (HCMs) in the immediate proximity to the project site including the Original Farmers Market, the Rancho La Brea Adobe, the Fairfax Theater, the Chase Bank building and an old air raid siren on Beverly Boulevard. The Draft EIR includes an extensive discussion of the effort to protect the Main Studio Complex on the project site as supported by the LA Conservancy. The attention given to the other HCM sites in the Draft EIR is exceedingly general, with the impacts upon them considered less than significant. Will the existing and/or future use of these HCMs be enhanced or reduced by the scale of development proposed in the Specific Plan? Will increased project and cumulative traffic act to deter or increase the use of these resources? Although vibration impacts on HCMs are not concluded to be not significant, additional mitigation requiring monitoring the structural condition of these buildings throughout construction and indemnifying the owners for any structural damage due to vibration from project-related construction equipment would provide more reassurance that these historical resources will be preserved.

Response to Comment No. 20-4

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Draft EIR's analysis of potential impacts to The Original Farmers Market, Gilmore Adobe (also referred to as the Rancho La Brea Adobe), Fairfax Theater, Chase Bank, and Air Raid Siren No. 25. The analysis of the potential impacts to these resources is included on pages IV.B-27 to IV.B-31 of the Draft EIR and pages 87 to 90 of the Historic Report (Appendix C.1 of the Draft EIR).

The analysis is not "general" and is based upon the thresholds in Appendix G of the CEQA Guidelines. A significant impact is defined as a substantial adverse change such as demolition, destruction, relocation, or alteration of a resource or its immediate

surroundings. Thus, the thresholds are focused on the physical characteristics that convey the significance of a historical resource. The commenter does not explain why the trips generated by the Project would result in a change of use of any of the historical resources in the vicinity of the Project Site. Furthermore, a change of use would not automatically result in a significant impact, as demonstrated by adaptive reuse projects involving historical resources throughout Los Angeles. The commenter does not provide any evidence of how the scale of proposed development would result in the substantial adverse change in the significance of any of the historical resources in the vicinity of the Project Site.

In addition, Section IV.I, Noise, of the Draft EIR analyzed potential impacts from vibration on the historical resources in the Project Site vicinity, including the Gilmore Adobe and The Original Farmers Market. As demonstrated in the analysis provided on page IV.I-60 of the Draft EIR, potential vibration impacts on these historical resources would be less than significant. Specifically, as summarized in Table IV.I-20 of the Draft EIR, impacts at these locations would be no more than 0.011 peak particle velocity (PPV), well below the 0.12 PPV threshold of significance from Federal Transit Administration (FTA) for buildings “extremely susceptible to vibration damage,” the applicable standard for historical resources. Therefore, mitigation measures are unnecessary and not required by CEQA. Also refer to Response to Comment No. 363-2.

Comment No. 20-5

Thank [sic] for the opportunity to comment. We look forward to reviewing your responses prior to certification the EIR.

Response to Comment No. 20-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 21

Stephan Davis
Business Manager/Financial Secretary
IBEW Local Union 40
5643 Vineland Ave.
North Hollywood, CA 91601

Comment No. 21-1

On behalf of the International Brotherhood of Electrical Workers, Local 40, I'm writing to express our enthusiastic support for TVC 2050: The Los Angeles Studio Plan.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying construction jobs. Television City has agreed to employ union construction workers for the project which means new job opportunities for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 21-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 22

Keith Harkey
Business Manager
Ironworkers Local 433
17495 Hurley St. East
City of Industry, CA 91744-5106

Comment No. 22-1

On behalf of the union members of Ironworkers local 433, we want to express our support for the TVC 2050 project.

The Los Angeles Studio Plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying construction jobs. Television City has agreed to employ union construction workers for the project which means new job opportunities for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 22-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 23

Rachel Grose
Executive Director
Jewish Free Loan Association
6505 Wilshire Blvd., Ste. 715
Los Angeles, CA 90048-4958

Comment No. 23-1

TVC 2050 represents an extraordinary vision for the future of the entertainment industry in Los Angeles by supporting the industry's evolving demands. The TVC 2050 project would establish the TVC Specific Plan to allow for the continuation of existing studio use and the modernization and expansion of media production facilities within the project site.

The proposed Specific Plan would permit up to 1,874,000 square feet of sound stage, production support, production, and general office space as well as retail uses within the 25-acre project site.

Market demand will dictate the specific mix of uses that ultimately will be constructed. The Specific Plan would allow flexibility in locating the various uses throughout the studio lot. Flexibility is something that we should be thinking about in all future projects, because one thing we have learned from this pandemic, is the need to be adaptive and responsive to changing demands.

Thank you for this opportunity to submit a letter to express our support for the proposed Television City plan.

Response to Comment No. 23-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 24

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

Comment No. 24-1

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the TVC 2050 Project. The project would establish the TVC 2050 Specific Plan to allow for the modernization and expansion of media production facilities within the Television City Studio campus.

The Conservancy has long recognized the historic significance of this iconic studio and the need to preserve it as an important historic cultural monument. In 2018, the Conservancy initiated and worked closely with CBS to designate Television Studio as Historic-Cultural Monument (HCM) #1167.

I. Preservation and continued use of Television City

Television City opened in 1952 at the corner of Beverly Boulevard and Fairfax Avenue as the first large-scale, purpose-built television broadcast studio in the world. CBS hired local architecture firm Pereira & Luckman, with Gin Wong as the lead designer, to design the company's new headquarters, which contained soundstages, studios, editing rooms, offices, rehearsal halls, shops, and storage. Since its construction, Television City has been home to some of America's most iconic television series like *The Carol Burnett Show* and *All in the Family*. It was designated and listed as a HCM for both its architectural and cultural associations.

The Conservancy's consistent focus and goal has been to ensure Television City is preserved, as it fully transitions from CBS's long stewardship and tenancy to Hackman Capital Partners. We believe change and expansion is readily achievable at this large site while still allowing for the preservation of Television City, and for it to be appropriately modernized and updated for the future.

II. TVC 2050 Specific Plan

The proposed project is ambitious and will greatly expand the current and longtime use of this historic television production facility. Initially, through our Notice of Preparation (NOP)

comments, the Conservancy raised strong concerns about the design and overall scope of this project.

For nearly a year, the Conservancy worked with Hackman Capital Partners and their project team to create a refined and collaborative plan that preserves historic Television City and allow for significant new development at this legendary studio property. Through a reduction of the proximity, bulk and mass of the intended new construction, a comprehensive framework for a state-of-the-art modernization will now preserve the historic complex and maintain the 430-foot Beverly Boulevard viewshed. The revised plan is compatible with this historic place, and ensures the studio's much-needed modernization while protecting this historic building and maintaining its eligibility as a Historic-Cultural Monument (HCM).

The Conservancy greatly appreciates Hackman Capital Partners and the team's willingness to meet with the Conservancy and revise their proposal to meet many of our concerns regarding the integrity of Television City as a designated historic resource. Their openness to discuss issues and collaboration to date has created a project that the Conservancy supports. While there are still details to be worked out regarding the design and materiality of the proposed new construction, the Conservancy looks forward to being an integral part of this process in the future.

The Conservancy fully supports the TVC 2050 Project as we believe it provides for a win-win solution that balances both preservation and new development at the site. This will preserve the studio's history while adapting it to meet the unmet demands of production, and ensure Television City remains viable for future generations in the entertainment industry.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

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

Response to Comment No. 24-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 25

Chris Hannan
Executive Secretary
LA/Orange Counties Building and Construction Trades Council
1626 Beverly Blvd.
Los Angeles, CA 90026-5784

Comment No. 25-1

On behalf of the Los Angeles/Orange Counties Building and Construction Trades Council, representing 140,000 skilled construction workers in 14 Trades and 48 local unions and district councils, I am writing in support of the TVC 2050 plan and the accompanying Draft Environmental Impact Report (EIR).

As the Draft EIR analysis states, this plan is an economic engine for Los Angeles, with a strong tie-in to the historic and thriving entertainment industry that is such a part of our city's fabric. It will create thousands of jobs during construction for the state-of-the-art modernization of production facilities within the Television City studio property. Los Angeles needs this growth and new investment.

Television City will make a significant commitment to this iconic studio, preserving it as a working production center and bringing more than \$2 billion a year of economic activity to our region. In addition, Television City has a Project Labor Agreement with our Building Trades Council that guarantees this plan will be built with the best-trained union construction workers in the country. Many will come from Los Angeles and the cities of LA County, and will represent the diversity of all our communities.

Los Angeles needs more soundstages to keep our economy strong, and the Building Trades unions have the skilled members to construct these stages to the quality the entertainment industry demands. TVC 2050 will help keep filming in the City of Los Angeles and grow our economy.

On behalf of our skilled tradesmen and women, I enthusiastically support TVC 2050 and its investment in Los Angeles.

Response to Comment No. 25-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 26

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355 S. Grand Ave., Ste. 100
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Linscott, Law & Greenspan, Engineers
600 S. Lake Ave., Ste. 500
Pasadena, CA 1106-3907

Comment No. 26-1

On behalf of our client, The Grove, LLC, we appreciate the opportunity to provide written comments on the Draft Environmental Impact Report (“DEIR”) for the TVC 2050 Project. The Grove understands the importance of the entertainment industry to Los Angeles and strongly supports expanding and maintaining a thriving film and television studio at the

Television City property. The Television City property, however, should be developed in a manner that minimizes the adverse impacts to the surrounding residences and businesses.

Unfortunately, to the extent any information can be gleaned from the DEIR, which does not include the Specific Plan or anything more than “conceptual” development plans, it is clear the Project would have significant impacts on the surrounding community and its history. We respectfully request that the City work with the applicant to define the Project as CEQA requires and to address the negative impacts to and the concerns of the surrounding community.

Under CEQA, an environmental impact report must inform the public of what the Project actually is, the Project’s significant impacts, and the feasible mitigation measures or alternatives that would avoid or reduce these impacts. The DEIR falls short of those mandates, failing even to meet the most basic requirement of describing the Project. Further, the DEIR is missing crucial data, analyses, and mitigation measures that should have been included in the document across all technical sections. Given its many failings, the DEIR must be revised and recirculated.

Response to Comment No. 26-1

This comment introduces the comment letter and raises concerns regarding the Draft EIR, which are discussed further below. Refer to Response to Comment Nos. 26-2 through 26-183. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required.

Comment No. 26-2

What is the Project? There is absolutely no clarity as to what the actual Project is. The DEIR makes clear that the Project is essentially the establishment of a Specific Plan, but the Specific Plan is not included in the DEIR. The DEIR includes a conceptual site plan and description of height zones but then states the conceptual site plan only “illustrates one possible development scenario” and that the “height zones do not represent the actual development footprint of Project buildings.”

It is not even clear that studio uses are required. As described in the DEIR, the Project could develop just office and warehouse uses with no stages. The DEIR states the “combination of use may vary” and includes in its long list of possible uses on the site “conference facilities... special events, audience and entertainment shows, museum exhibits, theaters, ...restaurants and special event areas... warehouse... ***and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.***” Despite numerous references to the Specific Plan, no such plan is presented so the public and DEIR must assume all C2 uses are allowed. Uses permitted in the C2 zone include

hotels, hospitals, educational facilities, auditoriums seating up to 3,000 people, and many dozens of other uses.

By not providing an accurate, stable, and finite project description the City repeats the same mistakes it made in the Millennium Hollywood case. “Analyzing a ‘set of environmental impact limits,’ instead of analyzing the environmental impacts for a defined project, [is] not consistent with CEQA.” (*Stopthemillenniumhollywood.com* [sic] v. *City of Los Angeles* (2019) 39 Cal.App.5th 13.)

Response to Comment No. 26-2

These comments are similar to those raised in Comment Nos. 5-3, 5-5, 5-6, 5-15, 9-12, 9-13, 9-14, and 9-16. Refer to Response to Comment Nos. 5-3, 5-5, 5-6, 5-15, 9-12, 9-13, 9-14, and 9-16, as well as Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As explained in Response to Comment No. 5-3 and Topical Response No. 1, a draft Specific Plan was not required to be part of the EIR and all of the physical aspects of the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR as demonstrated in Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. In addition, as explained in Response to Comment Nos. 5-6 and 9-13 and Topical Response No. 3, Permitted On-Site Uses, consistent with the Project’s studio objectives, the permitted uses on-site will only include studio-related uses and associated ancillary uses, and these uses have all been addressed in the EIR. As such, the sound stage is the base unit from which all other land uses are organized—together, provided in the appropriate ratio, these studio-related uses provide the creative ecosystem that modern productions require. Without such mix of uses, a studio would not meet the minimum needs of productions and tenants. For example, the original development of Television City in 1952 included a mix of sound stage, production support, production office, and general office to support, sustain, and evolve with production needs. The language regarding C2 zone uses (which are currently permitted) referenced in this comment has been removed from the list of permitted uses within Section II, Project Description, of the Draft EIR. See Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment Nos. 5-5 and 9-12 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Conceptual Site Plan and the procedures under the proposed Specific Plan. Refer to Response to Comment No. 9-13 and Topical Response No. 1 regarding how the Draft EIR comprehensively analyzes the environmental impacts of a defined project. Also refer to Response to Comment No. 9-16 regarding the height zones. As demonstrated in these responses, Section II, Project Description, of the Draft EIR is accurate, stable, and finite and fully complies with CEQA, and the Project is distinguishable from the *Millennium* case.

Comment No. 26-3

The DEIR Is Full of Errors and Inconsistencies. The DEIR is fatally flawed as an informational document because it fails to identify significant impacts, fails to explain its assumptions and analyses, and fails to analyze and adopt all feasible mitigation measures across the entirety of the document. For example, the DEIR concludes no new fire facilities would be required to serve the Project despite the Los Angeles Fire Department concluding the existing facilities are “inadequate.” Additionally, the DEIR fails to identify sensitive receptors near the Project site, thus overlooking potential significant impacts. The analysis regarding trip generation and traffic are not supported and the analysis of VMT is contrary to the City’s own guidance and inconsistent with other data. Finally, the omission of a Health Risk Assessment in the DEIR despite significant air quality impacts is inexplicable.

Response to Comment No. 26-3

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA’s informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project potential environmental impacts under CEQA.

Refer to Response to Comment No. 9-35 regarding LAFD facilities and the City’s conclusion that potential impacts to these facilities would be less than significant.

The comment also claims the Draft EIR fails to identify sensitive receptors, which is incorrect. The identification of sensitive receptors is relevant to the analysis of air quality and noise and vibration. Refer to revised Figure IV.A-4, Air Quality Sensitive Receptors Locations, in Section III, Revisions, Clarifications, and Corrections to the Draft EIR for the location of air quality sensitive receptors, and Figure IV.I-3, Noise Measurement Locations—Project Site Area (R1 through R8), on page IV.I-20 of the Draft EIR for the location of noise sensitive receptors.

The comments regarding trip generation and traffic are incorrect and not supported by evidence. Refer to Topical Response No. 10, Trip Generation, in particular Section A, Empirical Data, regarding the collection of empirical data from other Los Angeles studios and its comparison to the trip generation rates used in the analysis in consultation with LADOT. This methodology, and the subsequent analysis, were reviewed and approved by LADOT. A full discussion of the trip length and other assumptions that went into the VMT analysis is found in Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-156.

Refer to Response to Comment No. 26-E.1-2 for a discussion of the Project’s Health Risk Assessment.

Comment No. 26-4

The DEIR is Fundamentally Inadequate. The DEIR also fails to present data in a manner calculated to adequately inform the public and decision makers, who may not have prior knowledge of the Project. “Information ‘scattered here and there in EIR appendices’ or a report ‘buried in an appendix,’ is not a substitute for ‘a good faith reasoned analysis.’” (*Vineyard Area Citizens v. Rancho Cordova* (2007) 40 Cal.4th 412 [quoting *California Oak Foundation v. City of Santa Clarita* (2005) 133 Cal.App.4th 1219, 1239].) The DEIR’s lack of clarity, length, inconsistencies, and reliance on appendices (and documents that are not appended) with no further guidance to the reader make it incomprehensible.

As a result of these failures and those detailed in the attached memorandum and the reports from Ramboll US Consulting, Inc., Linscott, Law & Greenspan, Shannon & Wilson and Statistical Research, Inc., the DEIR falls very far below the standards that the City and other public agencies would normally apply to documents for a project of this magnitude.

When faced with a long list of obvious mistakes and missing information, a concerned citizen could simply throw up their hands, note the general nature of the fatal flaw mistakes, and rely upon the fact that any future certification of the document would be overturned by the courts due to these mistakes. However, we have chosen to provide comments and information to the City as detailed as the limited time would permit in the hopes that the City will not repeat the same errors as in the Millennium Hollywood project and that it will endeavor to publish and recirculate a DEIR that corrects these errors. The community deserves nothing less.

Response to Comment No. 26-4

The comment asserts that the Draft EIR is inadequate but does not provide any specific examples. Refer to Response to Comment Nos. 26-5 through 26-183. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required.

With respect to the length of the document, the length of the Draft EIR reflects the amount of information and the comprehensive analyses that are included within it. Further, a full reading of the Draft EIR is not required in order to understand a general overview of the Project and its potential environmental impacts. The first section of the Draft EIR—Section I, Executive Summary—includes, among other things, a summary of the existing conditions, the Project, impacts not found to be significant, environmental impacts, PDFs, mitigation measures, alternatives, and public review process. A detailed description of the Project is included in Section II, Project Description, of the Draft EIR. Section IV, Environmental Impact Analysis, of the Draft EIR provides a comprehensive analysis of all

potential environmental impact. The environmental impact conclusions in Section IV are summarized in Table I-1 in Section I of the Draft EIR.

Regarding the *Millennium* project, see Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13.

Comment No. 26-5

THE GROVE, LLC

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT

Below are more detailed comments on some of the DEIR's flaws.¹ Given the lack of information as to the nature and scope of the Project, the below includes questions critical to understanding the Project and its impacts that must be addressed. The integrity of the CEQA process is dependent on the adequacy of the EIR. (*In re Bay-Delta etc.* (2008) 43 Cal.4th 1143, 1162 ("The EIR is the heart of CEQA.")) Without the information and analyses noted below, the DEIR fails as a vehicle for intelligent public participation. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455,467 ("[The EIR's] purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' To this end, public participation is an 'essential part of the CEQA process.'")) The DEIR must be revised and recirculated for another round of public review and comment before the issuance of a final EIR. (*Schellinger Brothers v. City of Sebastopol* (2009) 179 Cal.App.4th 1245, 1258 ("If the feedback is 'new' and 'significant,' the draft EIR may be modified, at which the period of notice and comment begins again. This process of resubmission is commonly called recirculation..."))

¹ In addition to the comments provided herein, attached are the following exhibits with additional comments for City's review and response: **Exhibit 1, Ramboll Report; Exhibit 2, SRI Report; Exhibit 3, Shannon & Wilson Report; and Exhibit 4, LLG Report.**

I. PROJECT DESCRIPTION

A. Project Description

The Project Description Is Not Stable and Finite

"An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.) "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider

mitigation measures, assess the advantage of terminating the proposal... and-weigh other alternatives in the balance.” (*Id.*, pp. 192–93.)

The DEIR’s project description does not satisfy these requirements and the DEIR accordingly fundamentally fails as an informational document.

Given the lack of a clear and well-defined project description, many of the analyses are deficient and inconsistent, rely on incorrect, unstated or varying assumptions, and fall short of analyzing the potential environmental impacts of the Project.

Missing Specific Plan. As specifically stated in the opening line of the TVC 2050 Draft EIR Project Description: “The TVC 2050 Project would establish the TVC 2050 Specific Plan...” (DEIR, p. II-1.) The Project Description goes on to reference provisions supposedly set forth in the Specific Plan 53 times. Overall the Draft EIR references supposed provisions of the Specific Plan 273 times. As listed on the City website, the Project Description for the TVC Project is as follows:

Project Description: The Project would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 25-acre Television City studio (Project Site)....

Although the Specific Plan essentially is the Project, the Specific Plan has not been included in the DEIR.

Why was the Specific Plan not included? Does the City planning staff have the Specific Plan? If so, has the City Planning staff reviewed in detail the Specific Plan? Why was it not provided to the public? As the Project is the adoption of the Specific Plan, how can the public evaluate the Project if the essential element defining the Project is not provided?

Per the DEIR, the Specific Plan “**would** establish a clear and cohesive development framework for the entire Project Site, serving to integrate the proposed mix of permitted land uses and set standards for Project Site planning, massing, and building design.” (emphasis added) (DEIR, p. II-12.) How is the public to understand the development framework and the rules governing the development and use of the site absent a copy of the Specific Plan? There is virtually no information in the DEIR regarding the development regulations of the proposed Specific Plan or the relationship of the Specific Plan to the Los Angeles Municipal Code (LAMC). The DEIR is supposed to be an informational document for the public and decision-makers. To add the Specific Plan after the DEIR has been circulated, particularly given the lack of any actual development plans in the DEIR, is meaningless for the public unless the DEIR is recirculated for public review and comment.

Without the context of the Specific Plan, the DEIR as drafted for this Project is essentially meaningless.

The repeated use of the word “would” in the DEIR begs the question as to whether the Specific Plan referenced hundreds of times in the DEIR has actually been drafted. If it has been drafted, but not included for review in the DEIR, then the public is being left in the dark as to what the Project actually is. If the Specific Plan has in fact *not* been drafted or provided to the City planning staff, then the public is not only being left in the dark as to what the Project actually is, but it is impossible for even the City to know what the Project is or how to analyze the Project impacts. Did the City’s environmental consultant have the Specific Plan? If not, how can the City’s environmental consultant prepare the DEIR? What was it analyzing? This is relevant information for the public to assess the informational value of the DEIR. If the Specific Plan was provided to the City’s environmental consultant and formed the basis of the environmental consultant’s analysis, then why was it not provided in the DEIR?

Similarly, was the Specific Plan made available to the various technical consultants that evaluated the Project’s impacts, such as air quality, noise, transportation, etc., when they were preparing those analyses? How can the technical consultants evaluate the Project (which principally is the Specific Plan) and prepare the technical reports if the essential document comprising the Project is not available to the consultants? Upon what Project information did the technical consultants base their analyses? As discussed below, the DEIR technical reports have varying descriptions of the Project (or no stated descriptions of the Project). How does the DEIR reconcile these differences in the analyses? A “...project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading.” (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) In order for the public to understand the Project and how it was analyzed, please provide a matrix showing the Project as defined for each of the technical analyses and the bases for those descriptions.

The DEIR states that “The Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development within Television City.” (*Id.*, emphasis added.) What are these “development guidelines and standards”? How can the City or the public analyze the potential impacts of the Project without knowing what these development guidelines and standards will allow or require? How did the City evaluate the impacts if the “development guidelines and standards” are not drafted? How did the City’s environmental consultant do so? How did the technical consultants do so? What is the “future development” referenced in the DEIR statement? As the “development guidelines and standards to regulate basic planning, design, and development concepts for future development” have not been provided, what is the information in the DEIR upon which the public can evaluate the “basic planning,

design, and development concepts”? Since the Specific Plan is not provided and the “development guidelines and standards” are not provided, will there be a future discretionary review process, subject to CEQA, for all “future development”? There must be informed decision-making with public review and comment at some point in the approval of the “future development.”

The DEIR states that the “development regulations... **would** address land use, design, historic preservation, childcare, alcohol sales, and parking, as well as associated implementation procedures,” (DEIR, p. II-12, emphasis added.) How can the public evaluate the impacts of the Project if the development regulations, which are undisclosed, will determine almost everything about the Project in the future? Everything about those types of issues is relevant to the environmental impacts of the Project and is missing from the DEIR. For example, hypothetical development regulations could permit a development of a studio facilities construction mill next to the adjacent residential properties, a truck staging lot or a basecamp next to the apartment building and across from a school, unlimited special events with amplified sound adjacent to residences, schools and the park, or unlimited audience participation shows with greater vehicle trips and demand for parking. The DEIR does not address these potential impacts. How can these impacts be assessed if the development regulations are not provided?

Further extending the DEIR’s error, the DEIR states that these “development guidelines and standards **would** provide a measure against which specific future development proposals could be evaluated.” (*Id.*, emphasis added.) Please explain how the undefined “Project” will somehow in the future be evaluated against an unknown set of development guidelines and standards in a Specific Plan that has not been provided to the public and possibly the City. How can the public comment on the potential environmental impacts of those future development activities and how can the City measure these future projects against unknown standards?

The DEIR must be revised and recirculated to include an accurate, stable and finite project description and sufficient analysis of such project that will enable the decision-makers to make a decision that intelligently takes account of the environmental consequences of the actual project.

Response to Comment No. 26-5

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR describes all of the physical aspects of the proposed Project that are necessary to fully evaluate the potential impacts of the Project, including, but not limited, to permitted and proposed floor area; a Land Use Exchange Program; design and architecture; height zones; frontage areas; building stepbacks; other design elements including screening and fencing; historic preservation elements; open space; landscaping;

public realm enhancements; access; circulation; parking; lighting; signage; site security; sustainability features; anticipated construction schedule; earthwork activities; and haul routes. As such, the Draft EIR does not “fail as a vehicle for intelligent public participation” or lack a clear and well-defined project description that results in deficient analyses that “fall short of analyzing the potential environmental impacts of the Project” as asserted incorrectly by the commenter.

As explained in Response to Comment No. 5-3 and Topical Response No. 1, CEQA and City policy do not require a draft Specific Plan to be included in a Draft or Final EIR. As discussed in Topical Response No. 1, CEQA defines the “project” to be analyzed in the EIR as the “physical change in the environment,” not the regulatory document describing that change. Also note the OPR Guide to Specific Plans provides that, “[t]o the extent feasible, the process of preparing the specific plan and the environmental analysis should proceed concurrently because both documents require many of the same studies and resulting information. The information in the EIR provides decision makers with the insight necessary to guide policy development, thereby ensuring the plan’s policies will address and provide the means by which to avoid potential impacts to the environment.” Although CEQA requires that a project description include a list of the entitlements sought, CEQA does not require the entitlements themselves to be included in the EIR. The Draft EIR comprehensively analyzes the potential environmental impacts associated with all proposed entitlements. Nonetheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website. Also refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR, which confirms that the physical Specific Plan elements were discussed and analyzed in the Draft EIR, and that the Preliminary Draft Specific Plan includes the same elements. This same information was used by the environmental consultant and the other technical consultants in preparing the impact analyses. The technical reports include the specific aspects of the Project necessary to evaluate the Project and those aspects vary by environmental topic.

The Project is similar to the project in the *Treasure Island* case referenced in this comment, which involved a comprehensive, long-range development plan to redevelop a former naval station located in San Francisco Bay. The Court in *Treasure Island* held that the project description was adequate where the basic characteristics of the project remained accurate, stable, and finite throughout the EIR process, and the project description included all of the information required by CEQA Guidelines Section 15124.¹²⁸

¹²⁸ *Treasure Island*, 227 Cal.App.4th at 1055.

Like the TVC 2050 Draft EIR, the EIR in *Treasure Island* included a “conceptual” land use plan. Also like the TVC 2050 Draft EIR, the *Treasure Island* EIR included height zones with maximum height envelopes and square footage limits for proposed uses. The Court in *Treasure Island* rejected appellant’s argument that the project description was not accurate, stable or finite because the project was nothing more than a “conceptual land use map” and lacked project-level details necessary to fully analyze potentially significant impacts.¹²⁹ To the contrary, the Court found that the “EIR made an extensive effort to provide meaningful information about the project, while providing for flexibility needed to respond to changing conditions and unforeseen events that could possibly impact the Project’s final design.” The EIR described permitted uses of the project area and provided detailed standards that would govern development, including (through incorporation by reference) plans showing street layouts and concepts for the shapes of new buildings and landscapes. The Court in *Treasure Island* explained that a project description that included both fixed elements (such as street layouts) and conceptual elements (such as the shape of buildings or specific landscape designs) was all that could be meaningfully provided at this stage.

In *Treasure Island*, the standards for development were comprehensive, although details regarding the final configuration and design of certain buildings had been left for further review. The Court concluded that even if some of the details had not been decided upon when the EIR was approved, “the basic characteristics of the Project under consideration remained accurate, stable, and finite throughout the EIR process.”¹³⁰

As discussed in Response to Comment No. 9-12 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project Description is accurate, stable and finite, and the Specific Plan sets forth a discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project or are beyond the scope of impacts analyzed in the EIR. Furthermore, the Specific Plan would only allow for development consistent with the parameters described in the EIR and would require future review by the City for conformance with the Certified EIR and the adopted Specific Plan.

Note that the City typically uses the term “would” when discussing a project in its environmental documents to reflect the fact that the project has not been approved by the decision-maker. As such, the term “would” is used throughout the Draft EIR, including within the discussion of development standards, as these standards “would” only be implemented if the Project is approved. Furthermore, the Preliminary Draft Specific Plan

¹²⁹ Id.

¹³⁰ Id.

development standards are consistent with those included in Section II, Project Description, of the Draft EIR (e.g., maximum floor area, building heights, frontages, stepbacks, etc.).

As identified in Section 11.5.7 of the LAMC, procedures for the establishment, amendment, or repeal of a specific plan are set forth in Section 12.32 of the LAMC. All procedures relevant to the initiation and processing of an application for a land use plan have been followed, and the commenter has provided no new significant information to the contrary. Refer to Response to Comment No. 26-22 regarding the comment about the relationship of the Specific Plan to the LAMC.

Refer to Response to Comment No. 9-17 regarding the design standards, which are a part of the Specific Plan.

Refer to Topical Response No. 3, Permitted On-Site Uses, regarding special events.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding audience shows and audience trips.

Thus, the Draft EIR fulfilled its informational purpose under CEQA by disclosing all of the elements of the Project required by CEQA, as evidenced by this comment's statement regarding the number of times the Specific Plan and its physical elements are discussed throughout the Draft EIR. Accordingly, environmental review is not premature.

All of the exhibits referenced in this comment have been fully responded to in the responses following this letter. With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-6

No Project. The DEIR also lacks any description of what is actually to be built at the Project Site. There are no development plans or other documentation in the DEIR clearly demonstrating the actual development proposed to be built. Without either the Specific Plan or actual development plans, how can the DEIR provide meaningful analysis of the Project's potential impacts? Without either the Specific Plan or actual development plans, how can the public assess the potential impacts? How did the City assess the environmental impacts?

The DEIR does provide a “conceptual site plan” to “illustrate one possible buildout scenario in accordance with the proposed development program” and lists a “maximum permitted floor area... for each of the individual land use categories.” (DEIR, p. II-15, emphasis added.) The DEIR makes clear that the conceptual site plan does not actually govern what might be developed. The DEIR is clear that the few plans included in the Project Description are all illustrative. Without the Specific Plan regulations, the conceptual site plan provides no guidance as to (a) what actually may be built, (b) where it may be built, (c) what limitations or regulations may restrict what may be built, and (d) what uses may be on the Project Site. What is the definition of each of the land use categories? Under which land use category are each of the permitted uses allowed? How did the DEIR, for example, evaluate air quality and noise impacts to residents in the apartment on the east side of the Project Site without clarity as to what will be built on the Project Site near the Broadcast Center Apartments? Did the analysis assume development next to the Broadcast Center Apartments would be a sound stage with its elephant doors open facing the residential buildings during set construction? Did it assume there would be a truck access road or parking area or a basecamp next to the Broadcast Center Apartments? Did it assume a fueling station would be located next to the Broadcast Center Apartments? Did it assume a “mill” for construction of stages would be located next to the Broadcast Center Apartments? Did it assume outdoor decks within 30 feet of the Broadcast Center Apartments with events occurring 7am [sic] to 12am? [sic] Without the Specific Plan regulations, it appears that all of these uses are permitted adjacent to the Broadcast Center Apartments. What are the air quality impacts and noise impacts on the residents from each of these potential uses?

Response to Comment No. 26-6

This comment appears to misunderstand the purpose and function of a specific plan as compared to an individual development project. A specific plan is a regulatory land use ordinance that establishes zoning regulations, such as maximum height limits and FAR. Precise architectural drawings for individual buildings, building floor plans, landscape plans and building material specifications are details that are not currently available and are not required at this time to be included as part of a draft EIR for a specific plan project. In fact, technical drawings may well supply extensive detail beyond that needed for evaluation and review of the environmental impact in violation of CEQA Guidelines Section 15124. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR provides all of the necessary information to provide a thorough analysis of Project impacts in accordance with CEQA.

As discussed in Response to Comment Nos. 9-12 and 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project would include height zones, setbacks, and frontage areas that will dictate the placement, orientation,

mass, and height of potential future buildings. In addition, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance. Furthermore, the Specific Plan would only allow for development consistent with the parameters described in the EIR and would require future review by the City for conformance with the Certified EIR and the adopted Specific Plan. Refer to Topical Response No. 1 and Response to Comment Nos. 5-5, 9-12, 9-13, and 26-12 regarding the conceptual nature of the plans included in an EIR. As discussed therein, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*. The Conceptual Site Plan along with the other information about the Project within Section II, Project Description, of the Draft EIR was used to fully evaluate potential impacts associated with the Project.

As discussed in Response to Comment No. 26-5, the development standards included in Section II, Project Description, of the Draft EIR are consistent with those within the Preliminary Draft Specific Plan. Note that Section II, Project Description, of the Draft EIR has been revised to limit the permitted uses and this clarified list of permitted uses is consistent with the Preliminary Draft Specific Plan. Specifically, as discussed in detail in Topical Response No. 3, Permitted On-Site Uses, Section III, Revisions, Clarifications, and Corrections to the Draft EIR, includes clarifications to Section II, Project Description, of the Draft EIR to provide a clarified list of five permitted studio uses within the Project Site consistent with the underlying purpose of the Project: sound stage; production support; production office; general office; and retail. The Project would also continue to allow for ancillary sitewide uses, such as parking, communication facilities, childcare, and facilities equipment and infrastructure supporting the studio and the five permitted land uses. Refer to Response to Comment No. 26-122 regarding the definitions of the permitted uses.

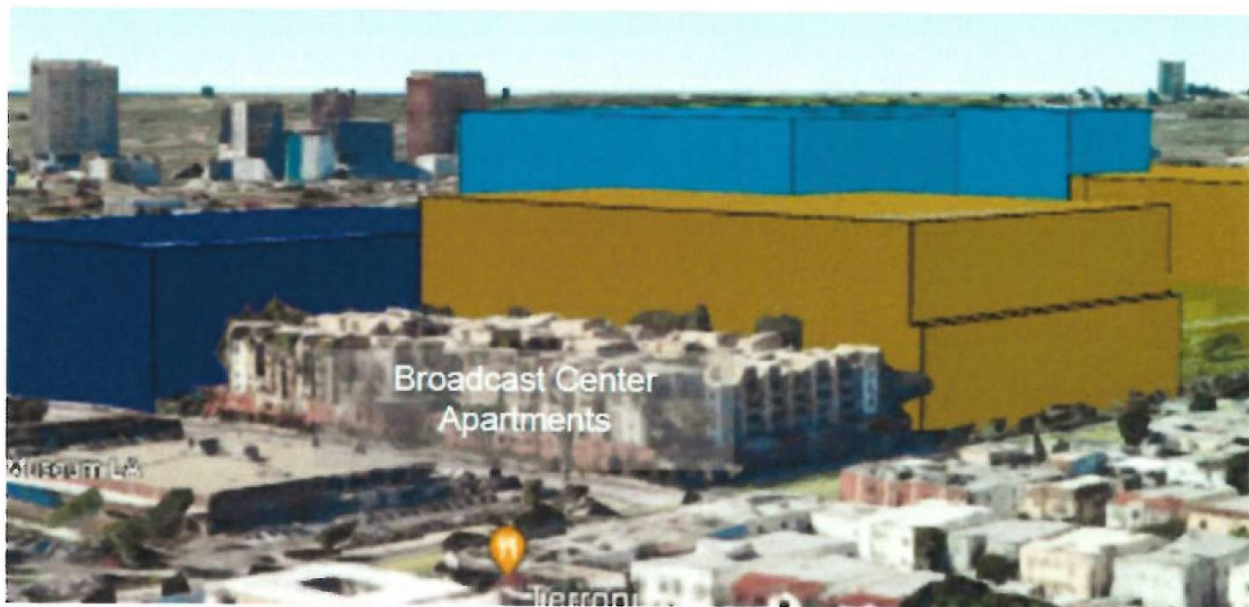
Consistent with existing practices, sound stages that are adjacent to residential uses, where set construction would occur within said sound stage, would occur with the elephant doors (large acoustical sliding doors) closed. As is consistent with the existing condition, regarding a truck access road or parking area or a basecamp that are adjacent to residential uses, these uses would continue to be allowed and have been fully analyzed in the Draft EIR and consistent with the Conceptual Site Plan. Regarding a fueling station adjacent to the Broadcast Center Apartments, or anywhere else on-site, no such use is allowed by the proposed Specific Plan. Additionally, no mill or outdoor decks would be

permitted within a minimum of 30 feet of the Broadcast Center Apartments based on the Project's proposed frontage area.

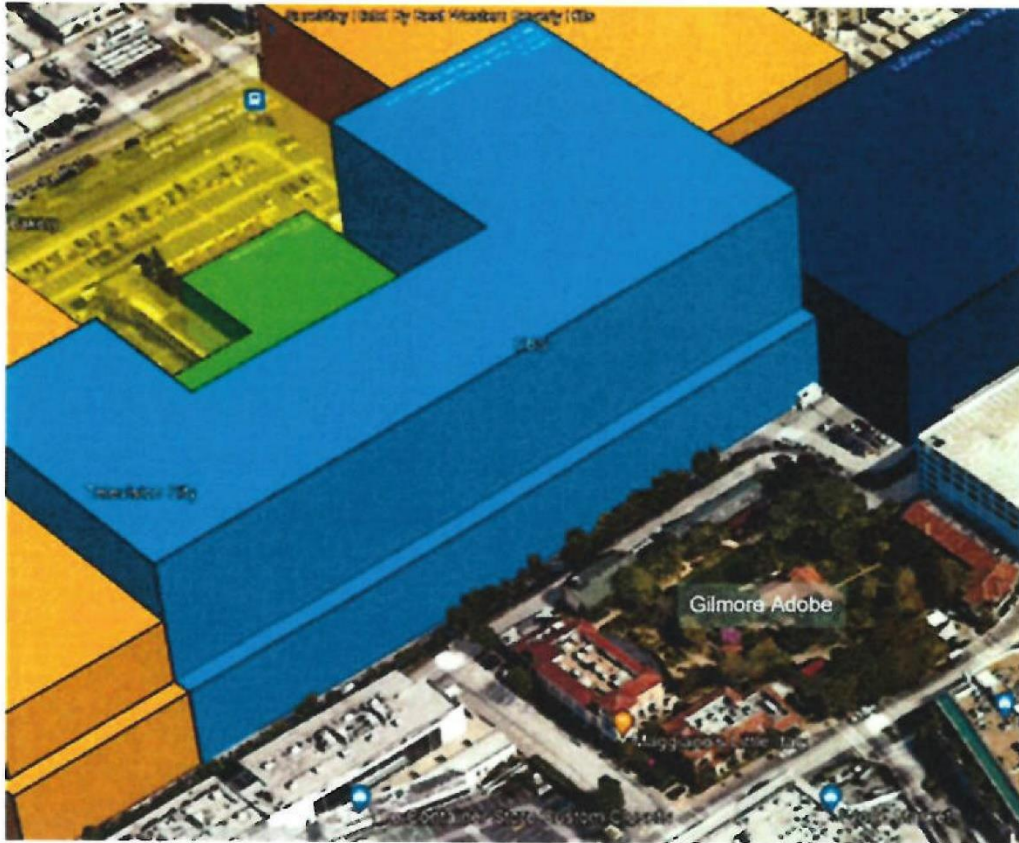
Regarding potential operational air quality impacts at the Broadcast Center Apartments, refer to Response to Comment No. 26-E.1-2. With regard to potential operational noise impacts at the Broadcast Center Apartments, refer to Response to Comment No. 26-146.

Comment No. 26-7

The DEIR also says the “height zones do not represent the actual development footprint of Project buildings.” The height zone figure states it is illustrative. Can a 160-foot building be built directly next to the apartment complex on the east? Can a 225-foot building be built almost directly adjacent to the Gilmore Adobe? Can a 58-foot building be built in front of the CBS Historic building as shown on the height zone figure? The maximum heights are permitted over a large portion (40%) of each of the taller height zones. Where exactly within each zone are the maximum heights permitted? Is there any further regulation of these maximum height zones? For example, what is the extent of the floor plate that could be developed to such maximum height? Absent that information, the DEIR should assume that a 160-foot tall building could be built along the entire western side of the existing Broadcast Center Apartments and a 130-foot tall building could be built along its entire southern side, significantly overwhelming this residential building as shown in the graphic below. The graphic represents the height zones. It is not a massing model. As noted below, it is virtually impossible to determine the Project's massing given the lack of information in the DEIR.



The DEIR should similarly assume that a 225+ foot tall building could be built along the entire southern frontage directly across from the Gilmore Adobe, overwhelming that historic structure as shown on the graphic below.



Further, the DEIR should assume that a 58-foot tall building could be built in front of the HCM and that 160-foot tall buildings could be built along Beverly Boulevard, overwhelming the HCM and the Historic District to the north as shown below.



We also note that the measurement of height as described in the DEIR is different from the LAMC and it appears that buildings across from the Gilmore Adobe could actually be up to 235 feet or 240 feet above adjacent grade. The DEIR states that “Project Grade” is based on the elevations at the northwest corner of the site and acknowledges that the existing site elevation slopes down as much as 15 feet at the southwest corner of the site. So, how tall can the building actually be as compared to existing grade? Are the maximum heights in Height Zones C and D actually an additional 15 feet taller in some areas? Which areas? Does this mean that a building along the southern frontage can actually be 240 feet tall? The public is not adequately informed as to the actual height of buildings. This is yet another example of how the DEIR fails to provide accurate information to the public. This information must be clarified in the DEIR.

Response to Comment No. 26-7

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR, and any substantial changes from the Project would be subject to a discretionary process with subsequent CEQA compliance review and subject to the maximum height limits set forth in the Specific Plan. There is no height limit for the Project Site under the current zoning regulations. Refer to Response to Comment No. 5-9 regarding the inaccuracies in the graphics included in this comment and how they do not portray what could be built under the proposed Specific Plan. In particular, these graphics do not depict the maximum height limitations in Height Zones C and D or appear to reflect the required frontage areas. As discussed on pages II-17 to II-20 of the Draft EIR, the proposed Specific Plan would permit heights up to a maximum of 160 feet in up to 40 percent of the Height Zone C area and up to a maximum of 225 feet in up to 40 percent of the Height Zone D area, with a base height limit of 88 feet within the remaining 60 percent of these height zones, whereas the graphics in this comment inaccurately depict the maximum height limits of 160 feet and 225 feet in 100 percent of Height Zones C and D, respectively.

This comment appears to misunderstand the purpose and function of a specific plan as compared to an individual development project. A specific plan is a regulatory land use ordinance that establishes zoning regulations, such as maximum height limits. Importantly, the maximum height limits established by the height zones are not the proposed heights for individual buildings. As discussed in Response to Comment No. 5-5, the height zones are not proposed as “illustrative” height zones. Rather, as described in the Draft EIR, these height zones set forth a maximum building height limit across the entire Project Site. New buildings would occupy only a portion of the building envelope permitted in each height zone. The height zones in the Draft EIR are the same as those in the Preliminary Draft Specific Plan.

Regarding Project Grade, given that the Project Site is comprised of approximately 25 acres, a set definition of Project Grade was established to reflect the predominant existing grade level consistent with the current studio operations, from which new building heights would be measured. As discussed on page II-9 of the Draft EIR, the Project Site slopes down gently from northeast to southwest. The existing Project Site slopes approximately 16 feet, with site elevation ranging from approximately 185 to 201 feet above mean sea level (AMSL). The existing Primary Studio Complex, in operation for over 70 years, where the four original production facilities are located, is set at an elevation of 201 feet AMSL. The Primary Studio Complex elevation will remain unchanged in the proposed Project, given its status as an HCM, coupled with its subsequent requirements. Primary production activities occur along a shared support spine and concourse, which encompasses the four 1952 sound stages and require a level and connected floor to

maintain a proper operational environment. As such, and given the importance and future integration of the Primary Studio Complex into the overall Project, maintaining the 201-foot elevation as Project Grade is an appropriate and critical consideration. A substantial portion of the existing topographic elevation of the Project Site is also at an elevation of 201 feet AMSL. As such, an elevation of 201 feet AMSL was used as the basis for measuring building heights across the Project Site. As shown in Figure II-3(c) within Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the existing topographic conditions at the primary corners of the Project Site are approximately 192.95 feet AMSL at the northwest corner, approximately 202.47 feet AMSL at the northeast corner, approximately 198.14 feet AMSL at the southeast corner, and approximately 185.07 feet AMSL at the southwest corner.

Furthermore, building heights are typically related to aesthetics. As described in Section 4.I on pages 30 to 31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact.” An evaluation of aesthetic impacts related to building heights is not required under CEQA.

With regard to building heights and on-site historical resources, refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-6 regarding the analysis of impacts to the Primary Studio Complex that accounts for building heights and demonstrates that potential impacts would be less than significant.

New buildings would be located a minimum of approximately 167 feet from the Gilmore Adobe. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 28-29 and 26-E.2-8 regarding how the Project would not impact the setting of the Gilmore Adobe or diminish its integrity such that its eligibility for historic listing is threatened.

With regard to building heights adjacent to the Broadcast Center Apartments, buildings to the west of the Broadcast Center Apartments could be up to a maximum of 160 feet in height within 40 percent of Height Zone C (the base height limit within Height Zone C would be 88 feet) and buildings to the south of the Broadcast Center Apartments could be up to 130 feet in height within Height Zone B. However, as shown in Figure II-5 of Section II, Project Description, of the Draft EIR, a 30-foot frontage area would be required along the Shared Eastern Property Line that would serve as a buffer between new buildings and the Broadcast Center Apartments. Between the required 30-foot frontage

area plus the Broadcast Center Apartment building's existing setback of over five feet, there would be over 35 feet separating Broadcast Center Apartments from any new building. Potential CEQA impacts to the Broadcast Center Apartments were thoroughly analyzed in Section IV of the Draft EIR and in the Initial Study (Appendix A of the Draft EIR).

Any new construction in Height Zone A (Viewshed Restoration Area) would be limited by the HCM Findings and LAMC Section 22.171.14, notwithstanding the 58-foot height limit in Height Zone A, which is taken directly from the HCM Findings. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-45.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding impacts to the Beverly Fairfax Historic District, if hypothetically assumed to be located within the Project Site vicinity.

The commenter's assertions about buildings "overwhelming" the Primary Studio Complex, Gilmore Adobe, Broadcast Center Apartments, and Beverly Fairfax Historic District are not supported by any evidence demonstrating an environmental impact under CEQA.

Also refer to Response to Comment No. 11-3 regarding how the height and scale of the Project are compatible with existing uses.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project's potential environmental impacts. Also refer to Response to Comment No. 26-6 regarding the purpose and function of a specific plan.

Comment No. 26-8

The discussion of setbacks is also unclear. For example, what are the limitations in the "Frontage Areas" shown on the Height Zone Map (Figure II-5? The DEIR says these are to be buffers and transitional space (DEIR, p. II-20). However, from the conceptual site plan, those appear to be truck access routes. Is a road with heavy truck usage consistent with a "buffer"? What regulations govern the "Frontage Areas"? Are there any setbacks provided that would not permit structures, trucks or other active uses in the Frontage Areas?

Response to Comment No. 26-8

There are no setbacks required for the Project Site under the current zoning regulations. The Project frontage areas are voluntarily proposed and they function with the same purpose as setbacks. Page II-20 of the Draft EIR states that “[f]rontage areas would function as buffers and transitional space around the Project Site perimeter. Within these areas, features such as sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and parking would be permitted.” As a transitional space, frontage areas would include space for vehicle and pedestrian access and circulation within the Project Site. As shown in Figure II-3 in Section II, Project Description, of the Draft EIR and in Figure II-8 on page II-517, the existing use of the areas proposed as frontage areas includes, but is not limited to, parking, vehicular access, and basecamp activities. The frontage area requirements described in the Draft EIR, which are the same as those included in the Preliminary Draft Specific Plan, would provide greater amenity space and viewsheds than what would otherwise be required by the current zoning regulations. Zoning and land use regulatory nomenclature is not a CEQA issue; however, the physical, built environment, and changes thereto are, and the physical aspects of the frontage areas, including vehicular activity on the internal circulation lanes shown in the Conceptual Site Plan, were fully evaluated in the Draft EIR. The commenter has not provided any information identifying a deficiency in the Draft EIR’s analysis with regard to the operational and physical characteristics of the frontage areas.

Regarding truck access, please note that at full buildout of the maximum square footage permitted under the Specific Plan, there would be a total of approximately 83 daily trucks during Project operation, and only a portion of these trucks would access the Project Site from the northeast driveways (only four trucks per day would use the northeast driveway adjacent to Broadcast Center Apartments). Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation.



LEGEND

FRONTAGE AREA

NOTE:

- Existing uses in the proposed frontage areas include, but are not limited to, surface parking, driveways and entry gates, circulation roads and areas for vehicles and pedestrians, security guard booths, security fencing and walls, trees and landscaping, signage, lighting and utility poles, and buildings and structures.

Figure II-8
Existing Uses in Proposed
Frontage Areas

Comment No. 26-9

The DEIR also states the combination of uses may vary and includes a litany of possible uses and activities permitted on the Project Site and then goes on to state: “***...and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.***” It is impossible to know what that means without the Specific Plan. One must assume that every use in the C2 zone is eligible to be developed on the Project Site since no Specific Plan is provided. Did the DEIR analyze all of those potential uses? Could there be a hotel in the Project? A hospital? A 3,000 seat arena for athletic, entertainment or e-sport events? What amount of the Project square footage could be allocated to each of the permitted categories of uses? How were all of these permitted uses analyzed? In the absence of this analysis, the DEIR lacks the information necessary to allow the public and decision-makers to understand the impacts of the Project. Please explain how the City, the environmental consultant and the technical consultants evaluated the impacts without understanding the range of permitted uses.

Response to Comment No. 26-9

This comment is similar to Comment Nos. 5-6, 26-2, and 26-5. Refer to Response to Comment Nos. 5-6, 26-2, and 26-5 and Topical Response No. 3, Permitted On-Site Uses, regarding the clarified list of proposed uses and how impacts associated with all permitted uses have been fully evaluated within the EIR.

Comment No. 26-10

In addition, while many of the Project objectives are to maintain and grow the entertainment studio business in Los Angeles, there does not appear to be any requirement to maintain the Project site as an operating studio or any requirement to allow the addition of supporting uses (such as production office, warehouse, basecamp, etc.) only in connection with construction of on-site stages for which such uses would serve. Is that a requirement of the Project? If not, with the range of permitted uses identified in the DEIR, how can the City be certain this will remain an operating studio use for at least the next 20 years? Were any other site plans submitted to the City or the environmental consultant during the preparation of the DEIR? What is the requirement as to how many stages must be built? And in what sequence (phasing) are the stages to be built? Is there a requirement that the other permitted uses be solely supportive of the on-site production uses? For example, will the office and warehouse uses only be allowed to support stage uses that are developed before or concurrent with the office and warehouse uses?

There is no indication in the DEIR that the Project restricts the development other than the overall maximum permitted square footage (for which permitted “floor area” is redefined by the Specific Plan), the unclear maximum heights and minimum setbacks, and some limited

separations around the HCM. Are there any other limitations as to what the applicant can build across the Project Site?

Response to Comment No. 26-10

Television City has been a studio for over 70 years, and the proposed Specific Plan will ensure that the Project Site will continue to operate as a studio in the future. In addition, the Applicant has committed to preserving and maintaining the original historic studio buildings for studio use and all of the character-defining features as reflected in the HCM designation for the Project Site that will be further memorialized in the adopted zoning regulations and entitlement approvals. Refer to Response to Comment No. 5-6 regarding the underlying purpose of the Project, which is to maintain Television City as a studio, and the limited range of permitted uses, which does not include warehouse uses (refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR). As discussed in Topical Response No. 3, Permitted On-Site Uses, the proposed Specific Plan only permits five studio uses (i.e., sound stage, production support, production office, general office, and retail) as well as related ancillary uses in support of the studio and the five permitted uses, all of which were fully disclosed and analyzed in the Draft EIR. Plans for alternate uses were not submitted to the City.

The comment regarding a requirement to build stages is similar to Comment No. 5-15. Refer to Response to Comment No. 5-15 for further discussion of the underlying purpose of the Project. In addition, as explained in Response to Comment Nos. 5-6 and 9-13 and Topical Response No. 3, Permitted On-Site Uses, consistent with the Project's studio objectives, the permitted uses on-site will only include studio-related uses and associated ancillary uses, and these uses have all been addressed in the EIR. Refer to Response to Comment No. 26-2 regarding the needs of modern production studios.

Regarding the construction timeframe, refer to Response to Comment No. 9-24. The Applicant anticipates that the Project will be built in a single phase.

The commenter's assertion regarding the "unclear" regulations is not supported by any evidence or explanation. With regard to the maximum floor area for each of the five permitted uses, refer to Table II-2 and page II-16 of Section II, Project Description, of the Draft EIR. Also refer to Response to Comment Nos. 9-16 and 26-8 regarding the specificity of the height zones, frontage areas, and setbacks. As set forth in Section II, Project Description, of the Draft EIR, there are clear limitations on what the Project can build across the Project Site. These regulations are consistent with the regulations in the proposed Specific Plan, as demonstrated in Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 26-11

Lack of Stable Project Description is Clear Error. In *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, the Court of Appeal affirmed the trial court's decision that the City's CEQA review of the Millennium Hollywood Project was wholly inadequate because the EIR lacked an accurate, stable, and finite project description.

In *Stopthemillenniumhollywood.com*, [sic] petitioners challenged the adequacy of an EIR for a four-and-a-half-acre mixed-use development in Hollywood. The EIR described several potential development scenarios, but did not include the final project arrangement or density of specific land uses, siting, or massing characteristics, in an admitted effort to provide the applicant with "flexibility." Instead, the EIR contemplated only an "illustrative scenario" to demonstrate a "potential development program."

The Court of Appeal found that the project description was not only inconsistent, but also that it failed "to describe the siting, size, mass, or appearance of any building proposed to be built at the project site." (*Id.* at 17.) "The requirement of an accurate, stable, and finite project description [is] the sine qua non of an informative and legally sufficient EIR[.]" (*Id.* at 18.) The Court explained that concept scenarios and potential designs, none of which may ultimately be constructed, do not meet CEQA's requirement of a stable and finite project description. The Court rejected the City's argument that so long as the worst case scenario environmental effects had been analyzed and mitigated, CEQA's purpose was satisfied. By failing to provide a project description that evaluated what may actually be built, the Court determined that the EIR prevented the public from effectively participating in the approval process. Thus, the Court held that the lack of an accurate, stable, and finite project description prejudicially precluded informed decision-making and public participation.

Like the project description in the Millennium Hollywood case, the TVC Project's project description does not meet the requirement of a stable or finite proposed project. The TVC 2050 DEIR's mention of the Project's "development guidelines and standards" provides the public and decision makers little by way of actual information regarding the 'design features' or the 'final development scenario.' Rather, like Millennium Hollywood's "limits," the DEIR's supposed "limits imposed are vague and ambiguous." (*Id.*)

In describing what an acceptable project description would include, the *Millennium Hollywood* Court listed things like: “site plans, cross-sections, building elevations, or illustrative massing to show what buildings would be built, where they would be sited, what they would look like, and how many there would be.” (39 Cal.App.5th 19.) Like the *Millennium Hollywood* EIR, the DEIR for the Project lacks sufficient information.

Finally, like *Millennium Hollywood*, “there [are] no practical impediments as to why [TVC] could not have provided an accurate, stable, and finite description of what it intended to build.” (*Id.*) The City could have waited to complete a draft Specific Plan and included it in the DEIR. The applicant provided the City with some plans as part of its application as far back as March 2021. (See Exhibit 5, Vesting Tentative Tract Map.) Why didn’t the City use these plans that shows the location of proposed buildings as the basis of the DEIR analysis? Why are those plans not part of the Project description if that is what the applicant applied for? Why is the development not restricted to the plans filed with the application?

Lacking fundamental information to make reasonable conclusions about the Project and its impacts, the DEIR must be revised and recirculated to include an actual project description, including the Specific Plan, and other related documents such as the Sign District regulations, and re-analyze all impact areas to understand the impacts of what will actually be built, and not simply an undefined envelope of impacts for a project that apparently could be almost anything.

Response to Comment No. 26-11

This comment is similar to the comments raised in Comment Letter No. 9. As explained in Response to Comment No. 9-14 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR does not merely utilize a “worst case” approach for evaluating impacts of the Project. As explained in Response to Comment Nos. 9-5, 9-11, 9-12, 9-13, 9-14, 9-15, and 9-16 and Topical Response No. 1, Section II, Project Description, of the Draft EIR contains sufficient details regarding the Project design, including a Conceptual Site Plan (that is consistent with the architectural plans on file with the City) and other graphic images that portray the physical aspects of the Project. With regard to the proposed Specific Plan, refer to Response to Comment Nos. 5-3 and 26-5. Also refer to Response to Comment No. 5-10 regarding the proposed Sign District. As demonstrated in these responses and Topical Response No. 1, Section II, Project Description, of the Draft EIR is accurate, stable, and finite, and fully complies with CEQA, and the Project is distinguishable from the *Millennium* case. Further, as discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the

EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, neither CEQA nor City policy requires drafts of a Specific Plan or Sign District to be included in an EIR, and environmental review is not premature. A fundamental principle of CEQA is that EIRs should be prepared as early as feasible in the planning process.¹³¹ Per the OPR Guide to Specific Plans, a specific plan is typically drafted concurrently with the environmental review process and need not be included in the EIR. This allows the comments on the draft EIR to be reflected in the specific plan, thereby fulfilling CEQA's goal of public participation and feedback. Further, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*. These plans are part of the administrative record and have been publicly available on the Department of City Planning's website, as evidenced by this comment, which attaches the Project's proposed Vesting Tentative Tract Map that was submitted as part of the Project's application. Regarding recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-12

No Basis for Determining Environmental Impacts. Please explain how the DEIR can present an analysis of environmental impacts when the Project—essentially the adoption of an unspecific Specific Plan—remains undefined. How did the DEIR define an analytic framework for analysis of air quality, noise, transportation, and the other impact categories without that information? The applicant officially submitted to the City some project development plans in the applications for the Project available at <https://planning.lacity.org/pdiscaseinfo/caseid/MjQ3Mjg20>. Most of this information was submitted before the DEIR was completed. The information includes locations of buildings and uses, typical floor plans, elevations, parking and subterranean land use, and landscaping. How do these plans differ from the conceptual plan and height zones shown in the DEIR? Did the DEIR analyze the Project as reflected in these detailed plans? In what way? Why was this detailed information not included within the Project Description of the DEIR? Will these

¹³¹ CEQA Guidelines § 15004(b).

plans be part of the missing Specific Plan? If the development will differ from these plans, how will it differ?

The applicant has also provided information and plans regarding the development of the Project to the Neighborhood Council and Cultural Heritage Commission. (See **Exhibit 6**, TVC 2050 Presentation to Neighborhood Council and **Exhibit 7**, TVC 2050 Presentation to Cultural Heritage Commission.) These plans show proposed elevations, complete renderings of a fully built out Project, proposed viewsheds, site plans of various levels, circulation and access maps, and visual depictions of the Mobility Hub. How do these plans differ from the conceptual plan and height zones shown in the DEIR? Did the DEIR analyze the Project as reflected in these detailed plans? In what way? ‘Why were they not provided in the DEIR? Is the applicant constrained to these plans presented to the Neighborhood Council and Cultural Heritage Commission? The integrity of the CEQA process is called into question when the applicant shows the public and decision-makers “plans” outside of the DEIR but the DEIR says the applicant is not bound by any plans and provides virtually no development regulations.

The lack of Project plans in the DEIR itself and other information being provided to the City outside of the DEIR is confusing and misleading and further highlights the problems with the lack of an accurate-and stable Project description.

The DEIR states, “throughout this Draft EIR, where appropriate, the analyses address the potential impacts resulting from a hypothetical development mix under the proposed land use exchange program that would generate the maximum impact for that environmental issue (e.g., a maximum water demand scenario or maximum air emissions scenario). Accordingly, the maximum possible impacts of the Project are evaluated herein and represent the measure against which future land use exchange proposals may be considered.” (DEIR, pp. II-16 to II-17, emphasis added.) What is the hypothetical development mix? How many hypothetical development mixes are there? How can the public assess if a particular mix of uses would generate a greater impact for any one environmental impact area? What was the basis for determining that a particular hypothetical development mix generates the maximum impact for any particular area of analysis? What is the “real development mix”? Without the Specific Plan, an actual development program, or other information regarding the development regulations, it is impossible for the public and decision-makers to assess whether the maximum environmental impacts have been adequately disclosed and evaluated.

Response to Comment No. 26-12

Refer to Response to Comment No. 5-3 regarding how Section II, Project Description, of the Draft EIR includes sufficient information to fully evaluate the environmental impacts of the Project and how this information is consistent with the

physical aspects of the proposed Specific Plan. This information was specifically used as the inputs for the analyses of air quality, noise and transportation. As also explained therein and in more detail in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Conceptual Site Plan is based on the architectural plans on file with the City. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. The Neighborhood Council and Cultural Heritage Commission presentations were educational presentations to explain the Project, by and on behalf of the Applicant, with figures shown therein that are consistent with the proposed Project, proposed Specific Plan, and Figure II-4, Conceptual Site Plan, of the Draft EIR.

Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description includes all of the information required by CEQA Guidelines Section 15124 and how precise architectural drawings for individual buildings, building floor plans, landscape plans and building material specifications are details that are not required at this time to be included as part of an EIR for a specific plan project. Further, neither CEQA nor City policy requires a draft Specific Plan to be included in the Project's EIR.

Refer to Response to Comment No. 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project's proposed land use program set forth in Table II-2 of the Draft EIR and the Conceptual Site Plan set forth in Figure II-4 of the Draft EIR were evaluated throughout the Draft EIR and how the analyses also accounted for the limited Land Use Exchange Program. Refer to Appendix FEIR-3 of this Final EIR for a discussion of each of the maximum impact scenarios that were analyzed in the Draft EIR.

Comment No. 26-13

What evidence is there that the DEIR actually evaluated the "maximum impact" of the Project for each impact area? If the DEIR actually undertook this level of analysis, one would expect a discussion at the start of each environmental topic section discussing which "development mix" was evaluated and why that "development mix" "would generate the maximum impact." For almost all of the impact areas, there is no discussion or analysis as to why the assumed development mix used in that impact area (if it was actually even stated) would result in the maximum impact for that impact area. Please clarify for each impact section what was the "hypothetical development mix" that was evaluated and why that mix of uses evaluated would have the greatest environmental impacts in that impact area.

Without this analysis, how is it possible for the City and the public to understand the Project's true potential impacts?

Response to Comment No. 26-13

This comment raises the same topic as Comment No. 9-14. As discussed in Response to Comment Nos. 9-14 and 26-12 and in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR's environmental analysis accounts for the maximum potential environmental impacts associated with buildout of the Project as set forth in Table II-2 of the Draft EIR and in the Conceptual Site Plan included in Figure II-4 of the Draft EIR. In addition, the Draft EIR also analyzes the maximum impact scenarios (i.e., the development scenarios under the limited Land Use Exchange Program that would generate the greatest environmental impact). Refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic, as applicable, in addition to the proposed development program as set forth in Table II-2 of Section II, Project Description, of the Draft EIR.

Comment No. 26-14

No Clarity on Allowed or Proposed Uses. The DEIR provides no clarity as to what actual uses will be on the property, other than to reserve the right to develop virtually any use permitted in the C2 zone.

With the limited information provided, it is impossible to know what the Project will end up being (or what it will look like) and, therefore, what the impacts of the Project will be. The DEIR lists the following types of uses that would be permitted on site: "production activities; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, eSports, and media production; recording and broadcasting; sound labs; film editing; film video and audio processing; sets and props production; computer design; computer graphics; animation; and ancillary facilities related to those activities. The following types of related uses and facilities would also be permitted, as detailed in the Specific Plan: basecamps, communication facilities, conference facilities, modular offices and trailers, studio support facilities, parking, various ancillary commercial and retail uses to serve the onsite employees and visitors, catering facilities, special events, audience and entertainment shows, museum exhibits and theaters, childcare and educational facilities, fitness facilities, emergency medical facilities to serve the onsite employees and visitors, fueling stations and vehicle repair related to onsite uses ,and [sic] activities, infrastructure, maintenance and storage facilities, mills/manufacturing, sleeping quarters for certain onsite personnel, recreational facilities, restaurants and special event areas including the sale of alcoholic beverages, security facilities, signs, storage and warehouses, helipad, ***and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan.***" (DEIR, pp. II-15 to II-16, emphasis added.)

First of all, the DEIR does not state which category of land use each of these proposed permitted uses falls under, so the public has no idea of even a theoretical maximum amount of space used for any one of these permitted uses and activities. What land use categories do each of these activities fall under?

The applicable land use category is really just a guess given that there is no definition of the land use categories discussed in the DEIR. What are the definitions of each of the land use categories? For example, what is production office space and how is its definition, use, and function different from general office space? Are impacts for the two classes of office treated differently? If so, how and why? What is the basis for distinguishing between the two? How will their usage be regulated and enforced? Given the absence of regulatory information, the DEIR must assume the more impactful use for all analyses.

Similarly, what is the definition of production support? There is a litany of permitted uses that do not appear to be stage, office, or retail, but without the definition of the land use categories, it's impossible to tell. Is "conference facilities" part of production support, "production office," or "office"? How about "theaters", [sic] is that "production support," "stage," or "retail"? And warehouse, is that "production support" or something else? Without the definitions that might be in the Specific Plan (which was not provided), how could the preparers of the DEIR and technical reports know how much of these uses are permitted and accurately assess the related impacts?

Second, in addition to the other stated uses, the DEIR allows for, "all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan." As noted, there is no Specific Plan. The DEIR does not say which uses would be "expressly prohibited" so the DEIR must assume all uses are permitted. The C2 zone would provide more than one hundred additional allowable uses, as shown below.

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| • Bakery goods shop; | fraternal or religious associations; | • Florist or gift shop; |
| • Barber shop or beauty parlor; | • Confectionery store; | • Grocery, fruit or vegetable store; |
| • Book or stationery store; | • Custom dressmaking or millinery store; | • Hospital, sanitarium or clinics (except animal hospitals). |
| • Clothes cleaning agency or pressing establishment; | • Drugstore; | • Hardware or electric appliance store; |
| • Clubs or lodges, bridge clubs, | • Dry goods or notions store; | • Jewelry store; |

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| <ul style="list-style-type: none"> • Laundry agency; • Meat market or delicatessen store; • Office, business or professional; • Photographer; • Restaurant, tea room or café (excluding dancing or entertainment); • Shoe store or shoe repair store; • Tailor, clothing or wearing apparel shop; • Laundries or cleaning establishments of a self-service type using only automatic machines with non-flammable cleaning fluid; • Indoor swap meets; • Joint living and work quarters for the following occupations: accountants; architects; artists and artisans; attorneys; computer software and multimedia related professionals; | <ul style="list-style-type: none"> consultants; engineers; fashion, graphic, interior and other designers; insurance, real estate and travel agents; photographers and other similar occupations as determined by the Zoning Administrator • Facilities for the development of software (including the reproduction of software and data) and other computer and media-related products and services, not including hardware. • Skilled Nursing Care Housing; • Alzheimer's/ Dementia Care Housing. • Eldercare Facility. • Addressograph service. • Air conditioning equipment service. • Appliance repair, household. • Aquarium. | <ul style="list-style-type: none"> • Auditorium having a seating capacity for not more than 3,000 people. • Baths, Turkish and the like. • Blueprint and photostating. • Bootblack stand. • Broadcasting studio, without transmitting towers. • Building materials, retail. • Burglar alarm business. • Collection agency office. • Department store. • Employment agency or bureau. • Exhibits, commercial or cultural. • Export import business, with not more than 3,000 square feet of storage area. • Frozen food store. • Interior decorating store. • Locksmith shop. |
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| <ul style="list-style-type: none"> • Mimeographing service. • Museum (for profit). • Newsstand. • Physical culture institution, reducing salon. • Rubber or metal stamp store. • Sound score production • Studio, except drama, dancing, music, and motion picture. • Swimming pool, commercial. • Telephone exchange. • Theater, and showcase theater. • Trading stamp business. • Typewriter or adding machine repair. • Art or antique shop. • Bird store or taxidermist, or a pet show for the keeping or sale of domestic or wild animas | <ul style="list-style-type: none"> • Carpenter, plumbing or sheet metal shop. • Catering show. • Feed and fuel store. • Interior decorating or upholstering shop. • Sign painting shop. • Tire shop, provided the tire shop is in compliance with all of the development standards and operating conditions set forth in Section 12.22 A.28. of this Code. • Restaurant, tea room or cafe (including entertainment other than dancing) or a ground floor restaurant with an outdoor eating area. • Advertising signs or structures and billboards. • Amusement enterprises, including a billiard or pool hall use, whether primary or ancillary to the subject business, | <ul style="list-style-type: none"> bowling alley, games of skill and science, penny arcades (except those containing more than four coin or slug-operated or electrically, electronically or mechanically controlled game machines), shooting gallery, skating rink and the link. • Automotive fueling and service station • Used automobile and trailer sales area • Baseball or football stadiums or boxing arenas, having a seating capacity for not more than three thousand (3,000) people • Automotive laundry or wash rack • Church • Circus or amusement enterprise of a similar type • Drive-in businesses, including theaters, refreshment stands, |
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restaurants, food stores, and the like	automobile parking as primary or accessory uses.	vibration, or other similar causes.
<ul style="list-style-type: none"> • Ferris wheels, carrouseles, merry-go-rounds, and the like. 	<ul style="list-style-type: none"> • Pony riding ring, without stables. 	<ul style="list-style-type: none"> • Wedding chapel, rescue mission or temporary revival church.
<ul style="list-style-type: none"> • Film exchange. 	<ul style="list-style-type: none"> • Printing, publishing or lithographing establishments 	<ul style="list-style-type: none"> • Massage parlor
<ul style="list-style-type: none"> • Ice storage house, not more than five (5) tons capacity. 	<ul style="list-style-type: none"> • Automotive repair 	<ul style="list-style-type: none"> • Laundries or cleaning establishment
<ul style="list-style-type: none"> • Medical or dental clinics and laboratories. 	<ul style="list-style-type: none"> • Public services, including electric distributing substation, fire or police station, telephone exchange, and the like. 	<ul style="list-style-type: none"> • Miniature or pitch and putt golf courses, golf driving tees or ranges, and similar commercial golf uses.
<ul style="list-style-type: none"> • Music conservatory or music instruction. 		
<ul style="list-style-type: none"> • Newsstand. 	<ul style="list-style-type: none"> • Second-hand store, except pawnshops, if all activities other than incidental storage are conducting wholly within a completely enclosed building. 	<ul style="list-style-type: none"> • Shelters for the homeless
<ul style="list-style-type: none"> • Nursery, flower or plant, provided that all incidental equipment and supplies, including fertilizer and empty cans, are kept within a building. 		<ul style="list-style-type: none"> • Motion picture, television, video and other media production, no outdoor sets
<ul style="list-style-type: none"> • Parcel delivery service, branch, if all activities including storage and loading and unloading, are conducted within a completely enclosed building. 	<ul style="list-style-type: none"> • Studios (except motion picture). 	
	<ul style="list-style-type: none"> • School (elementary or high), educational institution, or private school. 	
	<ul style="list-style-type: none"> • Indoor swap meets 	
<ul style="list-style-type: none"> • Parking buildings and all buildings containing 	<ul style="list-style-type: none"> • Trade school, if not objectional due to noise, odor, 	

Because the DEIR does not identify which (if any) of these are “expressly prohibited,” did the DEIR analysis assume that all of these uses could be present at the Project Site? If not, which uses were assumed to be prohibited? How did the City come to the decision to exclude specific uses, if they were actually excluded from the analysis?

According to the DEIR, the applicant is allowed to include a hospital or clinic, a special event venue for 3,000 people, a FedEx or UPS facility, schools, and more. The DEIR must analyze specific, particular impacts related to each of these permitted uses. The lack of a real project description in the DEIR and the “flexibility” that is apparently being built into a completely undefined Specific Plan moving forward makes it impossible to know what will happen on the Project Site. For example, can the stages be used for e-sports activities? Are these spectator events? How many spectators? How often? How many times a day? What type of manufacturing and mill facilities are permitted and at what size and quantity?

Response to Comment No. 26-14

This comment raises the same topic as Comment Nos. 5-6 and 26-2. Refer to Response to Comment Nos. 5-6 and 26-2 and Topical Response No. 3, Permitted On-Site Uses, regarding the clarified list of proposed uses and how impacts associated with all permitted uses have been fully evaluated within the EIR. Based on the comments received on the Draft EIR, the permitted uses were clarified to reflect the Project’s studio objectives, including, among other things, removing the C2 zone text on page II-16 of the Draft EIR referenced in this comment. The list of C2 zone uses included in this comment are currently permitted uses for the Project Site, and the Project would substantially narrow the uses that would be permitted on-site. Hospitals, clinics, event venues, shipping facilities, and schools would not be permitted. The proposed Specific Plan would only allow five land uses—sound stage, production support, production office, general office, and retail—as well as related ancillary and supportive uses that support the studio and the five permitted land uses, all of which were fully disclosed and analyzed in the Draft EIR.

Refer to Response to Comment No. 26-122 regarding the definitions of the permitted uses in the Specific Plan, including the definition of production office and general office uses. Production office is defined as a studio land use that includes office uses associated with or in furtherance of production activity, including but not limited to merchandising, marketing, promotion, licensing, sales, leasing, accounting, distribution, legal, and administration. General office includes general office uses, which may or may not include those office uses associated with or in furtherance of production activity, including but not limited to merchandising, marketing, promotion, licensing, sales, leasing, accounting, distribution, legal, general commercial, professional, executive, business, and administration. With regard to the definition of production support uses, these are uses that primarily support production activities and employee services, “such as storage and mills” (page II-5 of the Draft EIR). Studio support facilities, such as mail rooms, would also be

permitted. Production office and general office uses may include conference rooms; however, a “conference facility” would not be permitted. E-sports and theater facilities that are used for production activities would be permitted under the sound stage definition and would not be allowed in any other permitted use, such as production office or production support. Audience capacity would be regulated by applicable LAMC and State regulations, as is the case with current existing conditions. In addition, the defined warehouse uses are not proposed as part of the Project and would not be permitted under the proposed Specific Plan. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding special events.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how the Project Description complies with CEQA, the limited Land Use Exchange Program and the regulatory process under the proposed Specific Plan.

Regarding the specific question of the utilization of sound stages for sports activities, competitive activities with contestants for production purposes, e-sports, or similar creative endeavors would be allowed, as the existing condition allows today.

Comment No. 26-15

The DEIR also summarily mentions the relocation of an existing helipad use but provides no operational information with which to assess its impacts. How often is the helipad used now? What existing restrictions or regulations are there on the use of the helipad? Does the Project propose to increase the use of the helipad from the baseline condition? If so, how? Does the Project propose to change any existing restrictions or regulations on the use of the helipad? If so, which and how? Can the helipad be located next to the Broadcast Center Apartments? What restrictions will be imposed on the use of the helipad in the future? How are any changes in the helipad use from baseline conditions assessed in the DEIR? Impacts on noise, air quality, hazards, land use, and other impact areas need to assess the changes in location and use to the helipad. What are the safety considerations of the helipad use? Could, for example, helipad use conflict with any helicopter use by Cedars-Sinai Medical Center for medical transport? For what use will the helipad be permitted. Will the helipad be permitted to bring in celebrities to the stages? Studio executives? Can anyone rent the use of the helipad?

Response to Comment No. 26-15

As discussed on page II-15 and shown in Figure II-3 on page II-6 in Section II, Project Description, of the Draft EIR, “[e]xisting uses include, among other things, a helipad that has been in operation since 1951. The original Conditional Use Permit (CUP) (ZA No. 11412), approved on October 17, 1950, authorized the existing helipad and recognized it as a necessary accessory use to a successful studio. The existing helipad use will be retained in approximately the same location on the Project Site, but at a higher elevation,

as a part of the Project.” The helipad is currently located in the central portion of the Project Site on the roof of the Service Building, and the helipad will remain in that location with the Project (refer to Figure II-3, Key Existing Site Features, on page II-6 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). In addition, the Project does not propose to change this existing use. Therefore, the Draft EIR correctly analyzed the helipad at this location, and an analysis of other locations or other considerations, as requested by the commenter, is not required.

The comment states that the Draft EIR provides no operational information with which to assess the helipad’s impacts. However, the physical environmental impacts of the helipad were discussed and analyzed in the Draft EIR. As discussed on page IV.I-43 of the Draft EIR, the helipad would continue to operate in the same general location in accordance with the existing applicable regulatory requirements, and there would be no increase in helicopter use compared to existing conditions. The only change to the helipad would be its location at a higher level. As such, the noise levels associated with the continued operation of the helipad would decrease, and no other impacts would occur. The helipad is also discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As discussed on pages IV.F-29 to IV.F-30 of the Draft EIR, a clarifier associated with the helipad was observed during Project Site reconnaissance for the Phase I ESA. The helipad clarifier is plumbed to an external double-walled steel reservoir. Minimal stormwater is collected from the reservoir by maintenance staff and disposed of under manifest as a hazardous waste. The helipad clarifier and reservoir are inspected regularly during the City’s regulatory inspections. No visual or olfactory evidence of any spills, leaks, or releases has been observed. In addition, no past leaks or releases were reported by personnel, and the clarifier is not reported to contain standing fluids. Further, as discussed on page IV.J.1-24 in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, per LAMC Section 57.4705.4, the Project would be required to provide an emergency helicopter land facility (EHLF). The continuation of the existing helipad meets this requirement.

Nevertheless, in response to comments on the Draft EIR, the Helipad Operations Memorandum, which was prepared by Michael Klausman, President of Television City, and Jeff Mapes, Vice President of Facilities Operations at Television City, included in Appendix FEIR-15 of this Final EIR, discusses how the future operation of the helipad would continue to be similar to existing conditions, including the arrival and departure flight paths and the number of flight operations. Since the future helipad would be at a higher elevation, the noise levels due to helicopter operations would be slightly lower compared to existing conditions.

Comment No. 26-16

Redefining Permitted Floor Area (Size of the Project). The DEIR relegates a critical provision about the size of the Project to a footnote. After claiming that the Project will be limited to a maximum of 1,874,000 square feet, the very first footnote in the DEIR Project Description provides so many exceptions to what is included in that 1,874,000 square feet it is clear that significant aspects of the size of the Project are being excluded from the definition of the project and the analysis in the DEIR. The footnote admits that the square footage could be well over 2 million square feet, but that still appears to significantly undercount Project square footage and, in turn, the impacts of the Project.

The DEIR footnote redefines permitted “floor area” to exclude the following areas from the Project development square footage and, therefore, from the required analysis throughout the DEIR: “exterior walls; stairways; shafts; light courts; bicycle parking (covered); rooms housing building-operating equipment or machinery; basement and ground floor (covered) storage areas; recycling or waste management equipment or machinery; parking areas with associated driveways and ramps; areas related to the Mobility Hub; outdoor eating areas (covered or uncovered); trellis and shade structures; covered canopies; existing marquees and walkways (covered); outdoor production areas; buildings wholly constructed to house mechanical, plumbing, electrical, or other co-generation and storm water equipment; production trailers; basecamp areas; temporary uses; and sets/façades.” (DEIR, p. II-1.)

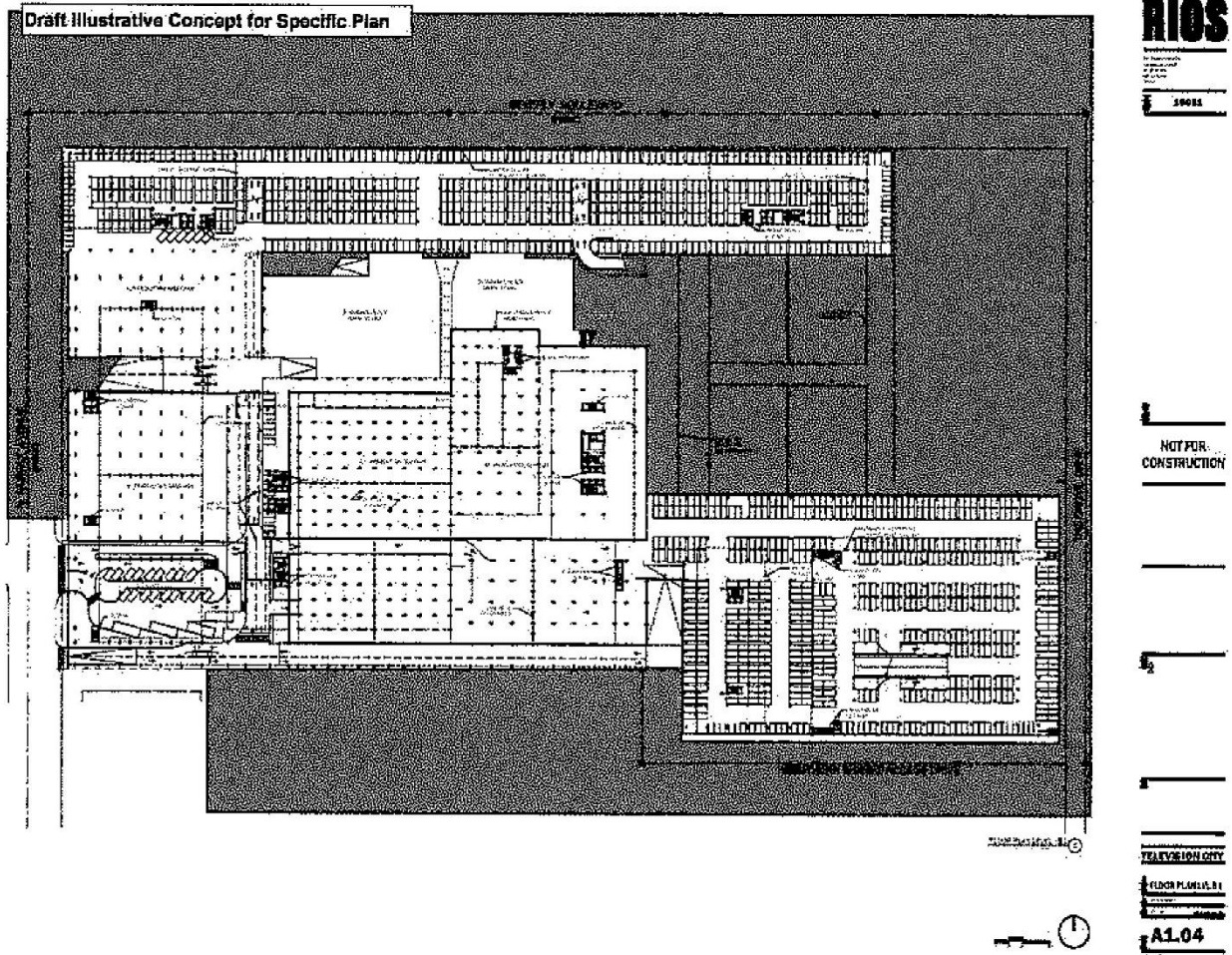
The Project’s proposed floor area definition excludes more areas than the LAMC definition of floor area. In significantly expanding the areas to be excluded from the floor area calculation, the DEIR grossly understates the size of the Project and the potential environmental impacts of the Project. Without a clear understanding of how much of these areas, including active production areas and basecamps, are incorporated into the Project, how is the public expected to understand the full scope of the Project? Excluding portions of the actual development from the definition of “floor area” would permit the Project to be much bigger than presented to the public in the DEIR. Thus the Project would have much larger impacts than is studied in the DEIR. The DEIR states, without explanation, that the change in definition would result in an approximately 110,000 square foot reduction in what is included in floor area as compared to the LAMC. How was that calculation made? What is the difference in the LAMC and DEIR definition of floor area?

The Project proposes to exclude, via a definitional change floor area that would generally be subject to environmental review, grossly understating the potential environmental impacts of the Project. Will the Project be limited to both the maximum DEIR definition derived 1.874 million square feet of floor area *and* the supposedly LAMC-derived 1.984 square feet stated in the DEIR?

The Project's website (images reproduced below) shows what appear to be below grade "parking areas" and "basecamp areas" with people working at these levels. By moving production activities below grade and redefining floor area, the DEIR appears to fail to study the impacts from these additional production areas. As indicated in the DEIR, there is an existing 95,540 square feet of sound stages and 325,450 square feet of production support. The DEIR states that the undisclosed Specific Plan would permit 350,000 square feet of sound stages yet reduce overall production support to a total 104,000 square feet. Given the significant increase in sound stages, the reduction of production support seems inconsistent with an operating studio based on industry needs to support production.

However, the Project description is misleading and may not actually reduce production support area—just redefine it so as to exclude it from the definition of "floor area." Excluded from floor area would be major areas of production support facilities through the use of production trucks and trailers and below grade areas. The current site has a ratio of 3.1:1 of production support to stage areas. Even assuming a reduced need for production support, at a 2:1 ratio, production support would be approximately 700,000 square feet, not 104,000 square feet. It appears that the below grade areas are really intended to serve as unaccounted for production space.

A review of the floor plans available in the City's files as part of the Project applications indicate that there will be at least 360,000 square feet of production area included as part of the Project that does not appear to have been counted as floor area and was not included in the DEIR analysis. This uncounted production area could actually be 500,000 or more square feet. Even if not defined as "floor area" these actively used production areas generate environmental impacts that should be studied in the DEIR. The DEIR should disclose and analyze these uncounted production areas. Please provide a detailed analysis of the actual floor area as defined by the LAMC reflected in the various plans provided to the City and in the public presentations by the applicant. Please include all subgrade areas available for use as production areas.



Below are visual renderings provided by the applicant of its below grade areas. The below grade areas are shown as being used for a wide range of production activities including dressing rooms, makeup rooms, props and sets, food services, bathrooms, meetings, trailers, and filming. The DEIR does not appear to include these actively used production areas in most of the analyses. The DEIR states, for example, that “Basecamps are defined areas at, near, or within a filming location where critical production activities can be coordinated. These areas provide for active use (including, but not limited to, loading, wardrobe, hair, make-up, craft services, etc.) and passive uses (including, but not limited to parking, storage of mobile facilities, power generators, support vehicles, etc.) all related to production activities.” (DEIR, p. II-7). What is the impact of using below grade areas to increase production support? If not included in the floor area analyzed in the DEIR, what is the increase in the impacts disclosed in the DEIR?



As a result of these activities and square footages, the DEIR understates impacts from the production activities that will occur in below grade areas on-site. Please provide an analysis of facilities designed to provide production support. It is important for the public and decision makers to understand the full scope of production support activity permitted at the site. Please also disclose the number, type and size of related production trucks and trailers that can access the site in total and on a daily basis. Also, will the Project Site be used as a staging area for offsite productions? For example, will production vehicles be staged at the Project Site for use in off-site location filming? Have all the impact area analyses provided for in the DEIR included the impacts from these “uncounted” floor area and activities? If so, please explain where and how as it is not evident from the DEIR.

By excluding square feet that will be actively used for production the Project's true floor area ratio [sic] (FAR) could exceed the requested FAR of 1.75:1. Even at the requested FAR of 1.75:1, the Project would be much more dense than other urban film and television studios with specific plans. At an FAR of 1.75, the density far outstrips that of both the Paramount Specific Plan and Century City South (Fox Studios) Specific Plan. The Project objectives do not justify such a dense project, which density will result in much greater impacts on surrounding properties. Why is such a high density project proposed? The Project applicant refers to these other studios as a reason for establishing a Specific Plan for the Project Site. Why does the Project need a density in excess of the Project Site's existing 1.5:1 FAR, which is already greater than these other studios' specific plans? Why isn't 1.0 or 1.2 FAR used as a basis for a reduced project alternative? Project impacts would be avoided or reduced if the Project's FAR was closer to that of other studio specific plan projects.

Studio	Studio Area	Maximum Total Development Allowed	Calc. FAR
Paramount SP	2,700,720 sf (62 acres)	3,284,400 sf	1.2
Fox (Century City South SP – Area B)	2,307,372 sf (52.97 acres)	1,895,000 sf	0.82

Response to Comment No. 26-16

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and to Response to Comment Nos. 5-7, 26-121, and 26-122 regarding the basis for the definition of floor area, how the Draft EIR does not underestimate the size of the Project, how all of the proposed areas, uses and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area, and how no active production activities would be located in the parking and basecamp areas below Project Grade. This is consistent with the renderings included in this comment, which show

basecamp uses below Project Grade and outdoor production activity and basecamp uses above Project Grade. It should be noted that basecamp uses operate as a subset of outdoor production activities at the Project Site, which is consistent with existing studio conditions. With the Project, the Applicant will continue this existing use with one limitation that no active filming would occur in parking or basecamp areas below Project Grade, which has been clarified in the Final EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The first rendering included in this comment depicts outdoor production activity at Project Grade, which would include active filming, as well as basecamp activities, and basecamp uses below Project Grade. As shown in the second rendering in this comment, some of the outdoor production activity and basecamp uses occurring at Project Grade may have overhangs and would not be fully enclosed. It appears that the commenter incorrectly assumes that the second rendering illustrates a location below Project Grade; this rendering shows a location at Project Grade adjacent to the existing sound stages contained in the Primary Studio Complex. Regardless of whether these areas would be open to the sky or covered partially, such areas were appropriately excluded from the definition of floor area because they do not independently generate production activity and all activity in these areas are accounted for in and derivative of the sound stage use.

As discussed in Response to Comment No. 26-121, outdoor production activities, which are related to and dependent on the sound stage use, currently occur throughout the Project Site and would continue to occur in a similar manner within the Project. As with the existing studio, productions that occupy the sound stages film outdoors within the Project Site, and this activity is captured by the sound stage use for environmental analysis purposes as an existing use that will be continued in the future with the Project. The comment incorrectly suggests that areas for outdoor production activities that occur today and are not considered floor area in the LAMC should be changed in the future for floor area purposes with this Project.

Refer to Figures II-3(a), II-3(b), II-4(c), II-4(d), and II-4(e) of Section III, Revisions, Clarifications, and Corrections to the Draft EIR, which show the existing and proposed basecamp and outdoor production activity areas. As shown therein, the Project would substantially reduce the amount of outdoor production areas, which would reduce impacts, such as noise associated with these areas. The general locations of the proposed uses are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*.

In addition, note that the total maximum floor area number of 1,874,000 square feet that would be permitted on-site would be based on the definition of floor area set forth on

page II-13 of Section II, Project Description, of the Draft EIR, which is also consistent with the definition provided in the Preliminary Draft Specific Plan. Regarding daily truck trips, refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation. The Project Site will not be used as a staging area for off-site productions.

Regarding the ratio of studio land uses, the existing studio currently includes substantially more production support floor area than is needed to support the studio, with very little sound stage area; nearly half of the existing studio is production support floor area, whereas sound stages make up less than 15 percent of the existing floor area, which is not consistent with most modern studio campuses. This imbalance of studio uses has resulted in an inefficient and underutilized studio campus. As discussed on pages II-10 and II-11 in Section II, Project Description, of the Draft EIR, the Project objectives include optimizing the currently underutilized studio and maximizing studio production capabilities by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities, production office, and general office. The proposed development program analyzed in the Draft EIR provides an adequate and complementary mix of uses. The digitization of the production industry has created the need for much more office space to support studio uses relative to sound stage and production support space. As stated on page II-10 of the Draft EIR, one of the goals of the Project is to “provide an expandable, flexible, and operationally seamless production ecosystem that can respond to evolving market demands, support content creation, and maximize studio production capabilities.” An operationally feasible balance of studio and studio-related uses is required for a successful modern studio, but the optimal balance of uses has changed over time and will continue to change as the needs of the entertainment industry continue to evolve. Accordingly, the Project is proposing a Land Use Exchange Program to allow for limited flexibility in the size of the studio uses (increases permitted only to sound stages and production support uses), discussed further in Topical Response No. 1. Notably, the needs of a modern studio were discussed in detail in the Applicant’s Neighborhood Council presentation that is attached to this comment letter.

As discussed in Response to Comment No. 26-12, the public presentations were educational presentations to explain the Project, and the figures shown therein are consistent with the Conceptual Site Plan.

Contrary to this comment, a reduction in the size of the Project would not substantially reduce or eliminate the potentially significant impacts associated with the Project, as these impacts are associated with construction noise and vibration and regional air quality emissions associated with the overlap of construction activities with operational activities. These impacts are related to the construction equipment mix and the proximity to sensitive receptors. A reduction in the size of the Project, as suggested, would not eliminate the noted impacts; rather, it would significantly hamper modern production operations and impact the studio’s financial viability. (Refer to Appendix FEIR-4, Economic

Considerations). Refer to Section V, Alternatives, of the Draft EIR and the analysis of Alternative 3, Reduced Density Alternative, on pages V-62 to V-90 of the Draft EIR. As discussed therein, although Alternative 3 would reduce the size of the Project by 20 percent, it would require the same excavation footprint and earthwork quantities as the Project. Moreover, although Alternative 3 would result in a reduction in overall construction activity, associated equipment, and the duration of construction, the peak level of daily activity—which are the factors used to determine air quality and noise impacts—would be similar to the Project.

Note that the comments regarding the density and the size of other studios do not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comments are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-17

Land Use Exchange. The proposed “land use exchange” permits “production support floor area [to] be increased from 104,000 square feet in exchange for decreases in other uses.” Is there a maximum on this use? What percentage of the Project Site could be production support floor area? How intense is this use? How many trucks, trailers, etc., could be added to the site? What amount of production support would trigger new significant impacts? Would the Specific Plan prohibit that level of production support? How? Can production support be provided to other off-site activities? Can production support be provided to other studios? Will production support services be provided to production not using proposed on-site stages? If so, have the related transportation impacts been assessed? Would there be any requirement that the production support be limited to on-site uses? Given the stated project objectives, will the Specific Plan require a base amount of stage to be constructed with/before office and production support uses?

Response to Comment No. 26-17

Land use exchange programs are common features that have been included in numerous specific plans throughout Los Angeles, including, but not limited to, the Paramount Pictures Specific Plan, NBCUniversal Specific Plan, USC Specific Plan, Los Angeles Sports and Entertainment District Specific Plan, Los Angeles International Airport Specific Plan, and Playa Vista Specific Plan.³⁸ The Land Use Exchange Program in the

³⁸ City of Los Angeles Ordinance No. 184,539, accessed at <https://planning.lacity.org/odocument/9eae5e02-0544-4bba-9d2d-96367165d695>; County of Los Angeles Ordinance No. 2013-0010, accessed at https://planning.lacounty.gov/assets/upl/case/tr_068565_specific-plan-approved-final.pdf; City of Los (Footnote continued on next page)

proposed Specific Plan would allow for limited flexibility with respect to the size of the five permitted land uses, subject to maximum floor area limits for each land use, as well as a total sitewide limit of 1,874,000 square feet. The proposed Land Use Exchange Program is more limited than many of the programs found in other specific plans, as it would only permit limited increases in sound stage and production support floor area. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the proposed Land Use Exchange Program. As discussed therein, the Land Use Exchange Program analyzed in the Draft EIR is identical to the program in the Preliminary Draft Specific Plan, except that, in response to comments on the Draft EIR, the Land Use Exchange Program in the Preliminary Draft Specific Plan was clarified to limit production support floor area to a maximum of 450,000 square feet. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. This change does not affect any of the environmental analyses or impact conclusions in the Draft EIR, as production support is generally the least impactful of the five permitted uses from a CEQA perspective. In addition, sound stage and production support uses are symbiotic (i.e., sound stages require some amount of production support), so increases in sound stages are typically accompanied by increases in production support area. Further, an operationally feasible balance of studio and studio-related uses is required for a successful modern studio. Thus, the 450,000-square-foot maximum limit for sound stages would have already indirectly limited the amount of production support floor area that would be developed.

The production support activities would be associated with on-site production activities and would not support off-site activities or other studios. The maximum amount of floor area that would be permitted for each of the five studio land uses is provided in Table II-2 and page II-16 of Section II, Project Description, of the Draft EIR, and the intensity of each of these uses has been accounted for in the impact analysis in the Draft EIR. There is no requirement that a base amount of sound stage be constructed with/before production office or general office and production support uses. Refer to Response to Comment Nos. 5-6 and 26-2 regarding the Project's studio objectives and mix of studio-related uses.

As discussed in Topical Response No. 1, the proposed Land Use Exchange Program would enable different ratios of the specified studio uses (i.e., different land use

Angeles Ordinance No. 182,343, accessed at <https://planning.lacity.org/odocument/63eaebbc-8804-486d-bfce-786657d47734>; City of Los Angeles Ordinance No. 174,224, accessed at <https://planning.lacity.org/odocument/ae3fa4-2d46-420a-b6b3-56bee727fb95>; City of Los Angeles Ordinance No. 185,164, accessed at https://planning.lacity.org/odocument/8c371dd7-15a2-4d05-a8ee-25a78a6362d4/13-0285_ord_182542.pdf; and City of Los Angeles Ordinance Nos. 160,521, accessed at <https://planning.lacity.org/odocument/656d910b-91fd-42c9-a795-33b259fb86bc/Playa%20Vista%20Area%20B%20Specific%20Plan.pdf>, 160,522, accessed at <https://planning.lacity.org/odocument/58f371f3-51d2-4436-bcc4-cf5411e576ba/Playa%20Vista%20Area%20C%20Specific%20Plan.pdf>, and 160,523, accessed at https://planning.lacity.org/odocument/c90c4ac0-f690-4e15-abc1-e153a5cd6b07/Playa_Vista_Area_D_Specific_Plan.pdf.

“mixes”), and the Draft EIR analyzed this “maximum impact scenario” such that the full range of impacts that could result from development under the proposed Specific Plan are disclosed.³⁹ Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project, including proposals that involve a land use exchange, or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding truck trips associated with operation of the Project. Note that a trailer would be attached to a truck and, therefore, is accounted for in the vehicle trips associated with the Project. In addition, it is not necessary to specify the number of trailers as such specific data are not necessary for any CEQA-related analysis.

Comment No. 26-18

Project Objectives Are So Vague As To Be Meaningless. The Project Objectives are unclear statements against which the Project could possibly be evaluated, are not met by the Project itself, and require more information to evaluate. Therefore, they do not meet the requirements of objectives under CEQA.

First, the Project Objectives are unclear statements against which the Project could not possibly be evaluated. For example, the first project objective provides that the Project should be an “expandable, flexible and operationally seamless production ecosystem.” How is the City evaluating the Project and the Alternatives against such a standard? What is the basis for that evaluation? What are the factors the City considered in evaluating an “expandable, flexible and operationally seamless production ecosystem”? What is a “production ecosystem”? Did the City retain a technical expert to assist it with the evaluation of this objective? This information is necessary for the public and decision-makers to understand what is meant by this objective and how it was used to evaluate the Project and Alternatives.

What does it mean to provide “adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio...”? How is that adequacy determined? What are the unique demands? How is safety determined in this context? Is that on-site safety? Offsite safety? How is the

³⁹ Please refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic, as applicable.

adequacy of circulation and parking assessed without development plans? The Project Site is already a production studio with ingress/egress. Is the existing ingress/egress not adequate? If not, how so? Have there been safety issues with the existing truck access to the site? As this is a Project objective, did the DEIR consider alternative ingress/egress, circulation, and parking scenarios? The DEIR should include such alternative information and an explanation of why the proposed access and circulation was chosen. This information is necessary for the public and decision-makers to understand what is meant by this objective and how it was used to evaluate the Project and Alternatives.

Second, the Project itself does not meet its own stated objectives. The Project does not “concentrate building mass and height towards the center of the Project Site.” In fact, as noted below, this objective appears to be largely inconsistent with the announced settlement between the applicant and the Los Angeles Conservancy. The buildings are not massed to the center of the Project Site. Exactly the opposite. They are massed to the perimeter of the Project Site as shown in the image below. The Project should be redesigned consistent with its own objective. Why would the City concentrate the impacts to the adjacent community? Isn’t that inconsistent with fundamental planning principles?



In addition, it is unclear how the Project provides an “adequate and complementary mix of state-of-the-art production support facilities...” when the Project is supposedly dramatically reducing the ratio of production support space to stage.

**Table II-2
Proposed Development Program^a**

Use	Existing (sf)	Demolition (sf)	Existing to Remain (sf)	Proposed New Construction (sf) ^b	Total Permitted (sf)	Net Change (sf)
Sound Stages	95,540	41,360	54,180	295,820	350,000	+254,460
Production Support	325,450	302,340	23,110	80,890	104,000	-221,450
Production Office	163,090	98,490	64,600 ^c	635,400	700,000	+536,910
General Office	159,600	53,670	105,930 ^d	594,070	700,000	+540,400
Retail ^e	0	0	0	20,000	20,000	+20,000
Total	743,680	495,860	247,820	1,626,180	1,874,000	1,130,320
<i>sf = square feet</i>						

Based on the Proposed Development Program there would be a 68% reduction in production support space while stages are increasing more than 260% (unless, as noted earlier, the Project is just failing to count all of its production support space.) What is considered an adequate amount of production support space per stage in the industry? How is that determined?

Third, some objectives require additional information for the public and the decision-maker to be able to adequately assess whether the Project meets the identified objective. For example, the last objective is to “Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant’s fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City.” (DEIR, p. II-12.) This Project objective was expressly used to evaluate the Project and the various alternatives. What information did the City obtain in order to understand whether the Project or the alternatives meet this objective? Did the City obtain the following information from the applicant or another source?

- Financial modeling for the Project including analysis of what the applicant’s expected “risk-adjusted return on investment” for the Project.
- Information to support what the “Project Applicant’s fiduciary responsibilities” are.
- Projections on the anticipated tax revenues for the City and analysis of the Project’s costs to the City.
- Detailed Project proforma including construction costs and soft costs (i.e., design fees, etc.).

Is there any other information that the City intends to use to evaluate such objective? The DEIR should provide all the financial information evaluated to support this objective with a the public the analysis by the City or its financial expert of this financial information description of how the City is using such information for this purpose. For example, did the City undertake an analysis of financial information provided by the applicant? Did the City retain a financial expert to review the applicant's financial information? Please provide to the public the analysis by the City or its financial expert of this financial information.

If the foregoing information was provided to the City, why was it not included in the DEIR?

What was the applicant's "risk-adjusted rate of return"? How was this evaluated? How does the applicant risk-adjusted rate of return compare to other developers of office, studio, and entertainment projects?

How much was paid for the property? How is the price paid for the property evaluated in the context of determining the appropriate risk-adjusted rate of return? Did the applicant pay a purchase price dependent on the City changing the Wilshire Community Plan land use designations to "Regional Center"? Did the applicant pay a purchase price dependent on the City approving a discretionary project that has impacts on the community? Are those appropriate bases for the City to evaluate the Project?

What are the applicant's "fiduciary responsibilities"? To whom are these "fiduciary responsibilities" owed? If not the City, why is this a relevant consideration? How were these fiduciary responsibilities evaluated?

Because the DEIR identified this as an objective of the Project and a basis upon which to evaluate the Project and the Alternatives, this information is critical to the public's understanding of the Project and DEIR analyses.

Response to Comment No. 26-18

The requirement to identify project objectives is set forth in CEQA Guidelines Section 15124(b), which provides that an EIR shall contain "[a] statement of the objectives sought by the proposed project," including "the underlying purpose of the project," but does not impose any substantive limitations on those objectives. The Project objectives on pages II-10 through II-12 accomplish just that. They include both the underlying purpose of the Project and a statement of the objectives for the Project. Those Project objectives were stated broadly enough to leave room for consideration of alternatives that reduce environmental impacts. The Lead Agency satisfied its obligations under CEQA and the CEQA Guidelines by preparing an EIR that allows for informed decision-making by giving meaningful consideration to potentially feasible Project alternatives with reduced environmental impacts.

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of how the Project objectives are not vague or unclear. An “expandable, flexible and operationally seamless production ecosystem” is referring to the mix of uses and activities that are needed to support the continued operation of a modern studio in a manner that responds to the changing demands of the entertainment industry. Refer also to Response to Comment No. 26-16.

In addition, the Project objective to “[p]rovide adequate, safe, and efficient ingress/egress, circulation, staging, and parking that satisfies the unique demands of a large-scale production studio with direct, enhanced access to the uses on-site and sufficient truck and trailer circulation areas, in compliance with modern fire and life safety requirements” is not unclear. This objective reflects the intent to develop a project that has adequate, safe, and efficient access that complies with modern life safety requirements, which is an important component of the Project. The information requested by the commenter is not required or necessary for the CEQA analysis. The Conceptual Site Plan meets this Project objective. Refer to the traffic and safety study included as part of the Transportation Assessment (Appendix M.1 of the Draft EIR), and Topical Response No. 12, Safety and Congestion. Refer to pages II-25 to II-30 and IV.H-52 of the Draft EIR for a discussion of the Project’s access, circulation and parking plan, which facilitates efficient, safe and effective production circulation. As discussed therein, the Project would incorporate a multi-level circulation plan to facilitate adequate, safe, and efficient ingress/egress, circulation, staging, and parking that meets the demands and unique security needs of a large-scale production studio. Refer to Response to Comment No. 16-11 regarding the multi-level circulation plan. Notably, the Project’s multi-level circulation plan was discussed in the Applicant’s Neighborhood Council presentation that is attached to this comment letter.

The existing Project Site has not experienced significant safety incidents, including safety issues associated with truck access under current operations. Note that security personnel are present at all gates to ensure safe and adequate access to the Project Site by all vehicle types. Also refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding queuing.

The statements that the Project does not meet its own objectives regarding height or mix of uses are also incorrect. Refer to Response to Comment No. 26-19 for a detailed explanation of how the Project meets the objective to concentrate building height and mass towards the center of the Project Site, while also preserving the integrity of the HCM onsite, which is another Project objective. Relative to building height, refer to Response to Comment No. 11-3. Refer to Response to Comment No. 5-9 regarding how the graphic included in this comment is inaccurate and does not portray what could be built under the proposed Specific Plan. Furthermore, note that the Los Angeles Conservancy has reviewed the Draft EIR and supports the Project; refer to Comment Letter No. 24.

Regarding the Project objective to provide an “adequate and complementary mix of state-of-the-art production support facilities[,]” the Project Site currently functions as a studio and would continue to do so with the Project. The Project seeks to modernize and enhance the studio and meet the existing unmet and anticipated future demands of the entertainment industry, which are continuously changing. The proposed development program shown in Table II-2 of the Draft EIR meets the underlying purpose of the Project. Refer to Response to Comment No. 26-16 regarding the mix of uses. In addition, the limited Land Use Exchange Program would permit limited increases in sound stage and production support uses (not to exceed 450,000 square feet each) in exchange for equivalent decreases in other permitted uses, which would allow the studio to adjust the ratio of studio uses in response to the demands of the entertainment industry. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 9-13, 9-14, and 26-17 regarding the proposed Land Use Exchange Program.

Contrary to the commenter’s claim, no active production activities or uses would be located in the parking or basecamp areas below Project Grade. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and to Response to Comment No. 26-121.

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding this comment’s CEQA-related questions about the economic objective. The financial information requested by the commenter is not required or necessary.

Comment No. 26-19

The Project Description Conflicts with Conservancy Settlement Agreement. The Project applicant and the LA Conservancy have announced a “Settlement Agreement” regarding the protection of the CBS Historic Cultural Monument on the Project Site. This announcement was made before the DEIR was released to the public.

As noted above, a stated Project objective is to “concentrate building mass and height towards the center of the Project Site.” As reported by the applicant and Conservancy, the HCM buildings in the center of the Project Site, are to be protected and the views to the HCM preserved. As a result, the Project design now has the buildings pushed to the perimeter of the Project Site away from the “center of the Project Site.” This change increases offsite impacts to adjacent properties and historical resources. The Project objective is inconsistent with the illustrative site plan and the announced settlement.

If the Project applicant is bound by the Conservancy Settlement Agreement, shouldn’t the elements of the Conservancy Settlement Agreement be reflected in the analyses in the

DEIR? Is the City, in essence, bound by the Settlement Agreement? If not, how does the “settlement” relate to the development of the property?

Has the City reviewed the Settlement Agreement and the restrictions agreed to by the applicant? Does the City have a copy of the Settlement Agreement? Since this Settlement Agreement is a key issue in the Project Site development and runs directly contrary to the Project objective shouldn't the public and decision-makers have an opportunity to review the Agreement? If the Settlement Agreement results in greater impacts to other historic resources, how can the City agree to implement it through the project approval process?

The Height Zone Map and description of height zones also does not appear to reflect the Settlement Agreement-with the LA Conservancy. It has been stated on the LA Conservancy website that the Settlement Agreement, which has not been provided to the public and may not have been provided to the City, provides for the following:

- The new proposal for TVC results in the following modifications—all intended to reduce the proximity, bulk, and mass of the intended new construction and impact on the historic TVC complex:
 1. Reduction of proposed new construction directly on top of the, historic TVC, eliminating 84 percent of overall volume and 102 feet of height
 2. Limitation to single volume rooftop addition with a maximum height of 36 feet, and set back 55 feet from existing TVC Stage Building north façade
 3. Setbacks for proposed eastern (60 feet from TVS Service Building) and western (150 feet from TVC Service Building) production office buildings
 4. Removal of proposed Flex Pavilion in front of existing TVC Service Building, and establishment of 60 feet no-build zone

However, it is unclear if these limitations are in the DEIR and in fact, the height zone map included in the DEIR conflicts with the stated settlement. With no massing permitted in these areas as provided for in the Conservancy Settlement Agreement, then the massing will likely be displaced to other areas on the Project site. If that is to occur, the DEIR needs to analyze it. Will the Specific Plan text allow for such displacement? Why doesn't the DEIR have to be revised to reflect the private agreement with the Conservancy and be recirculated for public review? If the City is going to implement the “Settlement Agreement” through the Specific Plan or other conditions of approval, shouldn't the Settlement Agreement be provided to the public and decision-makers for review?

The DEIR also fails to explain how the areas along the Beverly Boulevard frontage can have buildings up to 58 feet in height and at the same time protect the views of the HCM

for the pedestrian level on Beverly Boulevard. How is the view of the HCM protected from the corner of Beverly and Fairfax when the height district permits a building up to 160 feet at that corner? How is the Project Objective to provide the massing in the center of the property met by the Project after taking into account the Conservancy Settlement Agreement?

This issue needs to be reflected in the analysis and Project Description needs to describe accurately what the Project is. By not including this information in the Project Description, the public is left without an accurate understanding of how the Project may be built out and where the height will be located. When the Project Description is provided accurately, then the impact analyses have to be updated consistent with the accurate, finite, and stable Project description.

Response to Comment No. 26-19

As stated in CEQA Guidelines Section 15002(c), a “[p]rivate action is not subject to CEQA unless the action involves governmental participation, financing, or approval.” The confidential agreement between the Applicant and the Los Angeles Conservancy is an agreement between private parties and is, therefore, not required by CEQA to be discussed or analyzed in the EIR. The City has not reviewed the confidential agreement between the Applicant and the Los Angeles Conservancy. The Applicant confirmed that nothing in the agreement would conflict with the analysis in the EIR. In addition, any private agreement would not affect the restrictions and process set forth in the Preliminary Draft Specific Plan and is, therefore, not relevant to the impacts analyzed in the Draft EIR, and any potential conflict between the proposed Specific Plan and the terms of the agreement would be a private contractual matter between the Applicant and the Los Angeles Conservancy.

The Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR), and any substantial changes from the Project (including new structures proposed in and around the HCM and Viewshed Restoration Area that materially differ from the Conceptual Site Plan) would be subject to further discretionary review and CEQA compliance per the proposed Specific Plan, including review by OHR, as applicable, and the Department of City Planning. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the review process for new construction adjacent to the HCM and in the Viewshed Restoration Area. Refer also to Response to Comment No. 26-131.

This comment also discusses the Project objective to concentrate mass and height towards the center of the Project Site. The Project meets this objective through the

proposed height zone, frontage, and setback requirements in addition to the historic Project Parameters set forth as Project Design Feature CUL-PDF-1 to preserve the integrity of the Primary Studio Complex, discussed below. Collectively, these building restrictions and design elements would allow Project development to remain sensitive to both the HCM on-site and surrounding uses.

As discussed on pages II-17 to II-20 in Section II, Project Description, of the Draft EIR, the Specific Plan would include height zones with specified maximum height limits to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center of the Project Site, away from Project Site edges and adjacent uses; refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website. Height Zone A (the Viewshed Restoration Area) would extend 430 feet along Beverly Boulevard in the central/northern portion of the Project Site and limit building heights to up to 58 feet or two-thirds the height of the existing HCM (88 feet in height), consistent with and subject to the HCM designation (CHC 2018-476-HCM). Height Zone B in the southeastern portion of the Project Site and Height Zone C in the western, northwestern, and northeastern portions of the Project Site would limit building height to 130 feet and 160 feet, respectively. The tallest buildings on-site would be located in Height Zone D, in the central/rear portion of the Project Site, with a maximum height of 225 feet. Building heights above the Primary Studio Complex would be further limited, with heights limited to 36 feet above the existing parapet of the Studio Building in Height Zone E (approximately 84 feet above Project Grade) and no new occupiable buildings in Height Zone F. Additionally, new development within the Project Site would be subject to frontage area and building setback requirements, as described on pages II-20 to II-21 in Section II, Project Description, of the Draft EIR, and set forth in the proposed Specific Plan. Frontage areas would function as buffers and transitional space around the Project Site perimeter. Building setbacks are an architectural tool used to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation above Project Grade. Building setbacks would apply to those portions of buildings in Height Zones C and D greater than 88 feet in height above Project Grade. The Project would include a 17-foot frontage and a 10-foot setback along Fairfax Avenue, a 5- to 8-foot frontage and a 10-foot setback along Beverly Boulevard, a 30-foot frontage along the Shared Eastern Property Line, a 7-foot frontage along The Grove Drive, and a 10- to 30-foot frontage and a 20-foot setback along the southern property line/Southern Shared Access Drive. Compliance with these requirements would ensure that mass and height are set back from the Project Site perimeter and concentrated towards the center of the Project Site.

As shown in Figure V-1 of the Draft EIR and discussed in detail in the Applicant's Neighborhood Council presentation that is attached to this comment letter, development within the Project Site is constrained by the HCM on-site, which is located in the center of the Project Site. Instead of concentrating density towards the perimeter of the Project Site

where there is more available area for new development, as shown in the graphics included in the Neighborhood Council presentation, the Project concentrates height and mass towards the center of the Project Site adjacent to the HCM to the extent feasible while still preserving the integrity of the HCM.

In addition, the Project would comply with the Project Parameters in Project Design Feature CUL-PDF-1, included on pages IV.B-38 to IV.B-40 in Section IV.B, Cultural Resources, of the Draft EIR to ensure that the rehabilitation of the Primary Studio Complex preserves its historic significance and integrity and maximizes the retention of its historic fabric and character-defining features. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for a discussion of how the Project would restore and preserve the currently obstructed viewshed along Beverly Boulevard.

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the regulations and procedures for new construction in the Viewshed Restoration Area. As discussed therein, the 58-foot height limit, which is approximately two-thirds of the 88-foot height of the existing Primary Studio Complex, is taken directly from the HCM Findings. The restoration of the viewshed along Beverly Boulevard would be ensured by the historic regulations and procedures set forth in the Draft EIR and the proposed Specific Plan, and the 58-foot height limit is only one of the regulations that future development in the Viewshed Restoration Area would be required to comply with. The HCM Findings set forth the character-defining viewshed features of the Primary Studio Complex as seen from adjacent public areas along Beverly Boulevard. Per the Project Parameters (Project Design Feature CUL-PDF-1) set forth on pages IV.B-39 to IV.B-40 of the Draft EIR, which are incorporated into the Preliminary Draft Specific Plan, any future development in the Viewshed Restoration Area would be required to restore and maintain meaningful views of the Primary Studio Complex and the character-defining viewshed features set forth in the HCM Findings. Further, the Preliminary Draft Specific Plan includes objective development standards based on the HCM Findings. Accordingly, in addition to complying with the 58-foot maximum height limit and restoring the character-defining viewshed features, development in the Viewshed Restoration Area greater than one story in height would require a Project Compliance approval pursuant to LAMC Section 11.5.7[13B.4.2], which is a discretionary approval that would require subsequent CEQA compliance review. Consistent with the HCM Findings, the Draft EIR states that all new construction located within the Viewshed Restoration Area would require review by the Director of City Planning, which is reflected in the Preliminary Draft Specific Plan. Further, as discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to LAMC Section 22.171.14. As such, any proposal for new construction within the Viewshed Restoration Area will be required to

meet the objectives of the HCM Findings, conform with the Rehabilitation Standards, and would not result in significant impacts to the Primary Studio Complex as defined by CEQA. Thus, the Draft EIR correctly concluded that the impact from new construction as described in the Conceptual Site Plan within the Viewshed Restoration Area (Height Zone A) would be less than significant. In addition, the commenter is incorrect that the Viewshed Restoration Area includes the corner of Beverly Boulevard and Fairfax Avenue; the Viewshed Restoration Area is located to the east of that corner by approximately 441 feet.

As shown in Figure II-5 in Section II, Project Description, of the Draft EIR, a maximum height of up to 160 feet would be permitted in up to 40 percent of the Height Zone C area. Height Zone C is located on the western and eastern portions of the Project Site outside of the Viewshed Restoration Area. Refer to the three-dimensional diagram of Height Zone C provided in Response to Comment No. 5-9.

The construction of buildings up to 160 feet in Height Zone C as depicted in the Conceptual Site Plan would not significantly impact the Primary Studio Complex as analyzed in the Draft EIR.

Regarding the comment about the accurate, stable, and finite Project Description, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of the clearly-defined Project and Specific Plan.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-20

The Project Description Is Incomplete. In addition to not providing the Specific Plan or any real project description at all, the DEIR includes brief mentions of certain proposed uses that are not described or otherwise omitted from further discussion.

Mobility Hub. The DEIR discusses the potential benefits of the “Mobility Hub” throughout the DEIR, but never accurately or definitively describes what it will be, where it will be located, or what impacts the Mobility Hub itself might have. For example, will the Mobility Hub be open to public or just employees and visitors to the site? Will it serve other uses in the Beverly Fairfax area? How are shuttles, buses, and rideshare included in the trips generation and transportation analyses? Will Metro or other public transit providers use the Mobility Hub? Will other private shuttle providers use the Mobility Hub? Where can the Mobility Hub be located? Can it be located anywhere on the Project Site? Is the siting limited or can it be placed next to the apartment building or across from the school? Is

there a limitation on sizing? How many buses and shuttles can it accommodate? The Mobility Hub is a transportation project in and of itself that should be analyzed as such. For example, what are the air emissions from idling buses? Will all shuttles be electric? If not, the DEIR needs to treat it like a bus yard for purposes of impacts analysis. Where and how were the noise and air quality impacts from the Mobility Hub disclosed and analyzed in the DEIR? These sorts of questions go unanswered throughout the DEIR. Further, while some impact area analyses consider the Mobility Hub uses (e.g., water use), others completely ignore it (e.g., energy), leading to inaccurate and under-disclosed impacts.

Response to Comment No. 26-20

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of Section II, Project Description, of the Draft EIR, and the proposed Specific Plan. Regarding the Mobility Hub, the Mobility Hub has been adequately described and fully addressed throughout the EIR. Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 35-24 and 35-51. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate. As discussed in Response to Comment Nos. 26-E.1-23 and 35-138, the Mobility Hub would not generate trips; rather, it would reduce single-occupant vehicle trips to and from the Project Site and, thus, reduce VMT. Regarding noise and air quality impacts associated with the Mobility Hub, refer to Response to Comment Nos. 35-129 and 26-E.1-28, respectively. Refer to Topical Response No. 7, Mobility Hub, regarding the location, implementation schedule, and operation of the proposed Mobility Hub. The Mobility Hub would not be open to the public, and public transit providers would not use the Mobility Hub. Refer to Response to Comment No. 35-138 regarding rideshare trips. As discussed in Response to Comment No. 26-160, the Mobility Hub is not a transportation project as defined by the TAG; in fact, it serves the opposite purpose by reducing trips.

Comment No. 26-21

Sign District. The DEIR refers to a sign district and provides virtually no information regarding the nature and extent of Project signage.

The Project proposes 31,375 total square feet of signs on the north, east, and west perimeter. Virtually no information is provided regarding the nature and extent of this signage. For example, is there a maximum number of individual signs that will be permitted? An average highway billboard is 675 feet. At this size, approximately 45 billboards could be on the perimeter of the Project Site. Is there a maximum size per individual sign? Are there maximums by each sign type? How will sign area be measured? What types of signs are permitted—digital, wall, roof, projecting image, billboards, supergraphics? What are the limitations for each type of sign? What are the limitations on light and sound from the signs? For example, will the Project be permitted to

include supergraphics? If so, of what size? Can the supergraphics be illuminated? Is there a limit on the number or location of the supergraphics? Will signage be visible from the immediately adjacent apartments, schools, and park? If so, will there be any limitation on what is visible on such signs? From exactly which existing City sign regulations does the Project propose to deviate? How are off-site and on-site signs defined? There is reference made to “Vertical Sub-Districts” in the Figure II-10, but no explanation provided. Also, the signage plan is for “illustrative purposes only,” so what is the actual plan? Why was the “Sign District” not presented for review by the public? How can the public assess the impacts from signage if the plan is merely illustrative?

The Project would also allow an additional unlimited amount of “interior” signage. What constitutes “interior”? If it is visible from the Broadcast Center Apartments, is it interior? If it is visible from the Farmers Market or Gilmore Adobe, is it interior? Why is visibility defined as whether it is visible from offsite, public right of way, or publicly accessible plaza adjacent to right of way?

Further, it is not correct that only 31,375 square feet of signage is proposed on the site’s perimeter. The southern boundary, which is included in the Project Site “interior” for the description of the signage areas, has no square footage limitation for total proposed signage. Is there unlimited signage allowed on the southern property line? The public cannot know without the Sign District (which is not provided in the DEIR), but it appears that there is no limitation on the amount, size, and type of signage along the southern boundary.

The DEIR’s analysis appears to be limited to a discussion of the consistency of the proposed signage with the standards and goals of the Television Historic Sign Guidelines for the Primary Studio Complex (ARG’s report—Appendix C). However, Appendix C (DEIR page 490) has no “standards” or “goals” for signs on the new structures. Appendix C includes only guidelines for maintaining historic signs, replacement of existing signs, and for placement of signs on historic buildings. When it comes to new construction, Appendix C merely states that new signs outside of the historic viewshed area are to be consistent and compatible with the overall sign program. That appears to be a reference to the Sign District regulations that are completely absent from the DEIR. The disclosure and analysis of the proposed signage is completely lacking in the DEIR. The DEIR needs to be revised and recirculated with this information.

Response to Comment No. 26-21

Refer to Response to Comment No. 5-10 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Sign District, how the Draft EIR disclosed the physical elements of the proposed Sign District required by CEQA, and CEQA and City policy do not require the Preliminary Draft Specific Plan to be included in

the Draft EIR or the Final EIR. The Preliminary Draft Specific Plan will be made publicly available on the Department of City Planning's website prior to hearings for the Project.

Please note that, pursuant to Public Resources Code Section 21099 (SB 743), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts are not considered significant impacts on the environment and, therefore, do not require evaluation under CEQA. Nevertheless, the below responses are included for informational purposes only.

Refer to Response to Comment No. 5-10 regarding the maximum signage square footages allowed along the Project perimeter as well as the allowances granted for signage located within the Site Interior and Vertical Sub-District F.1. Signs located in the Site Interior and Vertical Sub-District F.1 are not intended to be publicly facing (as further described in Response to Comment No. 26-129) and as such are not limited in area, in keeping with signage precedent set by other approved sign districts and specific plans.

As signage is limited depending on a sign's location/placement within the Project Site, there is no limitation imposed on the individual number of signs, nor a limitation on any individual sign type. Signage, rather, is allowed in various sign typologies (e.g., architectural ledge signs, awning signs, wall signs, hanging signs, identification signs, information signs, wall signs, supergraphics, etc.). While many of these signs would be allowed site-wide, individual sign types would be governed based on their Sign Sub-District, Vertical Sub-District (a tool to limit signage above the Project's baseline height), or proximity to the Shared Eastern Property Line. Signs located within Vertical Sub-District F.1 of the Site Interior would not be visible from the public realm, as discussed in detail in Response to Comment No. 26-129. Signage located along the Project frontages would be visible from the right-of-way, but digital signage would be prohibited in this area. (Refer to the revised Proposed Signage Plan included in Figure II-10 of Section III, Revisions, Clarifications, and Corrections to the Draft EIR.)

All signs would be measured consistent with the definition of "Sign Area" codified within LAMC Section 14.4.2 and restated within the proposed Sign District. While individual signs generally would not have size limitations, signs located within Vertical Sign Sub-District F.2. would have a limitation of 300 square feet per building face. All signs that would be permitted within the proposed Sign District are on-site signs. No off-site signage (e.g., billboards) would be permitted. On- and off-site signage would be defined consistent with LAMC Section 14.4.2.

Signage referenced in the EIR and within those documents submitted to the case file is referenced as "illustrative" or "proposed" as no signage or design has yet to be approved by the decision-makers. Until such time as the Project entitlements are acted on by the

appropriate governmental body, the elements described are not approved and are correctly described as “illustrative” or “proposed.”

Refer to Response to Comment No. 26-129 regarding signage lighting and noise; visibility of signage from Broadcast Center Apartments, The Original Farmers Market and Gilmore Adobe; visibility of signage from the immediately adjacent apartments, schools, and park; and the Historic Sign Guidelines.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-22

Other Purported Changes to LAMC Regulations. The DEIR states that the Specific Plan would also address historic preservation, childcare, alcohol sales, and parking. Presumably, the Project would somehow be changing the regulations of the LAMC related to those issues. What changes are proposed? How can the public comment on the proposed changes if they are not disclosed and assessed in the DEIR? For example, what alcohol sales will be permitted? What will be the related regulations, hours of operations, security, etc.? Will alcohol service be permitted in stages? In theaters? How will the alcohol approvals be issued? Will these be discretionary approvals and will the public have an opportunity to comment on those decisions? What will be the minimum and maximum parking for each permitted use? Will, for example, stages with audience participation have a different parking requirement than stages that are not rated for audiences? If a stage is rated for up to 500 audience guests, what will be the parking requirement? What will the environmental impacts from changes to the City’s general standards for all of these uses?

Response to Comment No. 26-22

As discussed in Subsection 5 of Section II, Project Description, of the Draft EIR, the primary development regulations set forth in the proposed Specific Plan would address development of the Project related to land use, design, historic preservation, childcare, alcohol sales, and parking, as well as associated implementation procedures; refer to the Preliminary Draft Specific Plan. Although not required by CEQA or City policy, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding permitted uses, Topical Response No. 5, Historical Resources, regarding historic regulations, and Topical Response No. 13, Parking, regarding parking supply and operations.

As discussed in Response to Comment No. 9-18, the proposed Specific Plan would incorporate the same LAMC regulations and PDFs set forth in Section IV.B, Cultural Resources, of the Draft EIR and would codify the standards in the HCM designation.

Childcare is identified within the Specific Plan as a permitted ancillary use to general office. Any potential childcare use would be sited and constructed in accordance with all applicable regulatory requirements. Site-specific operational conditions for a childcare use are outlined in the proposed Specific Plan, including requirements that said facility shall comply with all applicable licensing requirements, State of California Code of Regulations requirements and site-specific regulations related to the location of activity space (if required by the State of California Code of Regulations, outdoor activity space shall be no closer than 200 feet from existing residential). In addition, Project Design Feature AIR-PDF-2 was added that requires any future childcare use to be located a minimum of 330 feet from the existing Big Blue emergency generator to the extent it remains in use; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Alcohol sales are discussed on page IV.H-30 in Section IV.H, Land Use and Planning, of the Draft EIR. The alcohol regulations are included in the Preliminary Draft Specific Plan and are consistent with both the City's existing regulatory requirements and the overarching operational hours and guidance of the California Department of Alcoholic Beverage Control. The proposed Specific Plan authorizes future on-site and off-site alcohol uses for the entirety of the Project Site and outlines parameters under which they may operate. However, it also requires the Department of City Planning to review and administratively approve each alcohol request to ensure that each use complies with all applicable regulations. Alcohol is currently permitted in sound stages during special events and studio-related events and would continue to be under the Project. The Specific Plan would permit theater facilities for on-site users that support production activities. Refer to Topical Response No. 3, Permitted On-Site Uses.

As discussed in Topical Response No. 13, Parking, the adequacy of a Project's parking supply is not a CEQA issue. Further, AB 2097 prohibits a public agency from imposing minimum parking requirements on development projects located within 0.5 mile of a major transit stop as defined by the PRC.

The proposed Specific Plan regulations are disclosed and analyzed in the Draft EIR as necessary under CEQA. The Project's impacts related to land use were analyzed in Section IV.H, Land Use and Planning, of the Draft EIR. In accordance with CEQA, the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including the LAMC and the Wilshire Community Plan, among others, as well as the compatibility of the proposed uses with surrounding land uses. CEQA Guidelines Section 15125(d) requires that an EIR include a discussion of any inconsistencies between the proposed project and applicable general

plans, specific plans, and regional plans. Separately, CEQA Guidelines Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Per Appendix G of the CEQA Guidelines, a project would have a significant impact related to land use if it would (a) physically divide an established community; or (b) cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As discussed on pages IV.H-38 to IV.H-39 in Section IV.H, Land Use and Planning, of the Draft EIR, the Project would not physically divide an established community. As discussed on pages IV.H-39 to IV.H-57 and Appendix I of the Draft EIR, which included an analysis of the General Plan Framework Element (including the Land Use Chapter, Open Space and Conservation Chapter, Economic Development Chapter, Transportation Chapter, and Infrastructure and Public Services Chapter), General Plan Conservation Element, the Mobility Plan, Wilshire Community Plan, LAMC, Citywide Design Guidelines, SCAG 2020–2045 RTP/SCS and SCAQMD AQMP, the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the Draft EIR correctly concluded that impacts related to land use would be less than significant.

Comment No. 26-23

Offsite Project Components are Not Disclosed. The DEIR states that the Project will require the excavation of over 700,000 cubic yards of dirt. How was that quantity calculated? Is it based on the conceptual site plan? If so, how does the City know that is the maximum? Will there be a limitation on the overall cut and fill at the Project Site?

A typical dump truck can hold approximately 10 to 14 cubic yards. Assuming approximately 700,000 cubic yards of excavation, the Project will generate the need to bring roughly 60,000 diesel dump trucks to the Project Site. Would that be 120,000 truck trips? Is there a limit on the daily number of dump trucks accessing the Project Site? Is there a size limit on the dump trucks?

It is unclear as to the total numbers of trucks needed to construct the Project. Did the City or environmental consultant know the total number of trucks needed to build the project? Is it 150,000 or 200,000 trucks? More?

Please provide a full description of the total number of trucks for Project construction, including excavation, rebar, concrete, steel, construction material and equipment, etc. Assuming the Project is constructed in its entirety in a 3 year period, how many daily trucks would need to come to the Project Site? How will these access the site if the construction time period is 3 years? What would be the number of trucks a day? What is the ability of

Fairfax Avenue to sustain such a number? How many construction workers required to access the Project Site? Does the DEIR analyses reflect that amount of trucks and construction worker traffic?

Response to Comment No. 26-23

The Draft EIR analyzed the proposed development program described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 of the Draft EIR), and, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. As stated on page II-1 in Section II, Project Description, and throughout the Draft EIR, Project construction would require an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill and up to 772,000 cubic yards of export. Thus, a total of approximately 822,000 cubic yards of import and export were evaluated. The earthwork quantities are based on the maximum potential grading for the proposed development program. The City of Los Angeles is the authority having jurisdiction and has approval authority, which if granted will provide the limitation on the cut and fill. Any substantial deviation from the Project would require further CEQA review.

The Draft EIR includes detailed information regarding construction activities, including the number of truck trips and construction workers. The analyses in the Draft EIR take into account that information. Refer to Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and construction workers. As discussed therein, as well as on page 181 of the Transportation Assessment (Appendix M.1 of the Draft EIR), the excavation/foundation subphase is anticipated to include up to approximately 640 total truck trips per day (320 truck trips in and 320 truck trips out of the Project Site), including approximately 300 haul trucks and approximately 20 delivery trucks over an approximately 8.5-month period. Haul trucks were assumed to carry approximately 14 cubic yards of soil. It would result in up to approximately 107 truck trips per hour on average, as shown in Table IV.I-11 of the Draft EIR. These truck trips are fully accounted for in the analyses within the Draft EIR. Also note that the delivery trips associated with rebar, steel, decking, sheet rock, glass, exterior walls, HVAC, plumbing, and other construction materials are included in the truck trips included in Topical Response No. 14, Construction Vehicle Impacts, and are fully accounted for in the analyses within the Draft EIR. The construction trucks would range in size, with the largest trucks consisting of a full-size semi-truck (WB-40 classification).

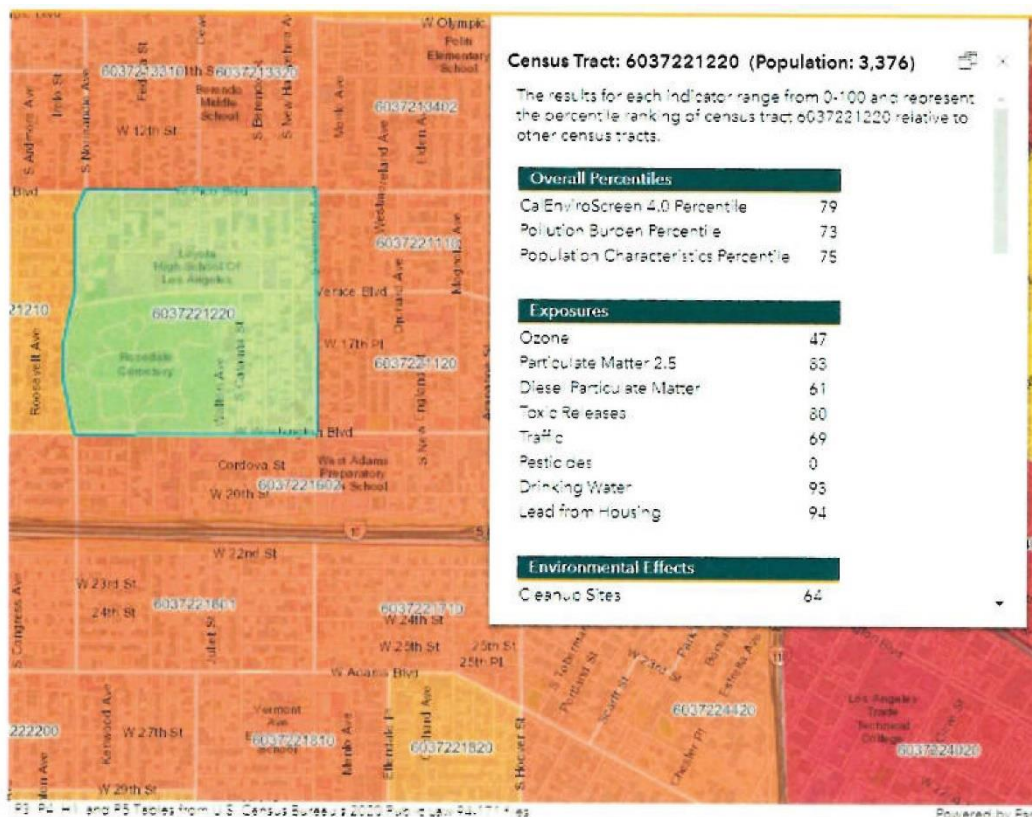
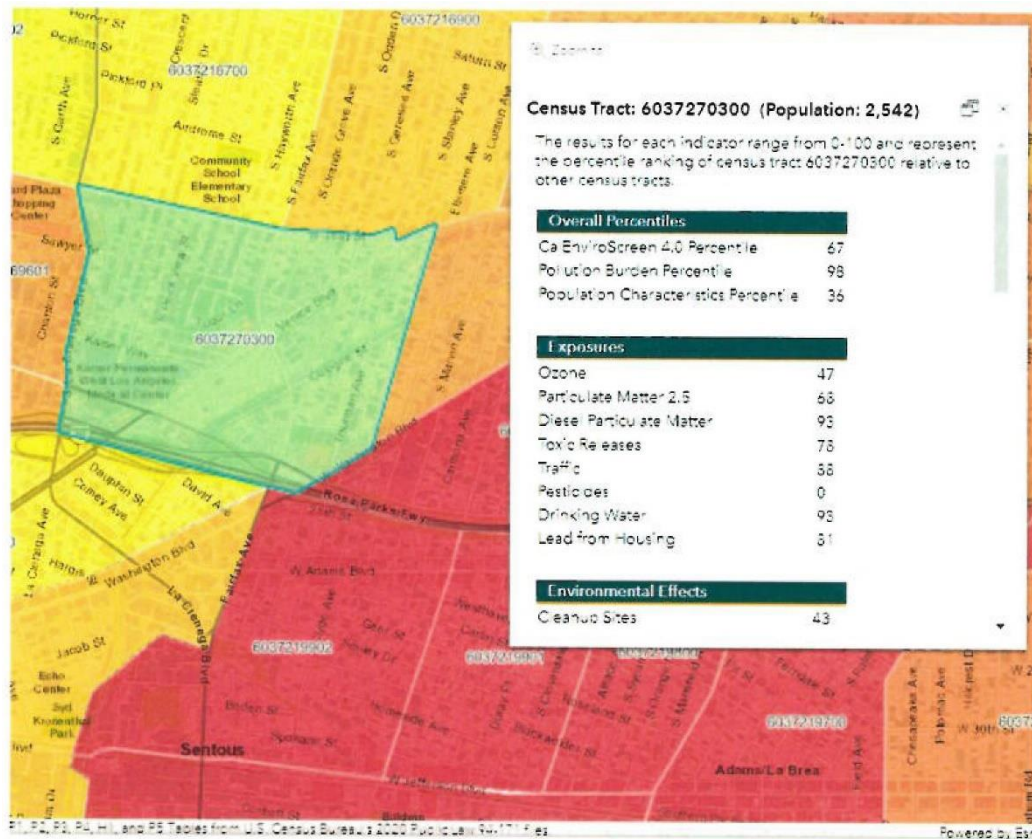
The last paragraph of this comment is substantively similar to Comment No. 5-12. Refer to Response to Comment No. 5-12, above. As discussed in Topical Response No.

14, Construction Vehicle Impacts, Project trip generation during construction would be less than the Project when fully operational and, thus, would have a lesser effect on traffic than the Project as analyzed in the Transportation Assessment (Appendix M.1 of the Draft EIR) and Section IV.K, Transportation, of the Draft EIR. Also refer to the Applicant's Neighborhood Council presentation that is attached to this comment letter (i.e., Comment Letter No. 26), and includes a graphic showing the trip capacity on Fairfax Avenue.

Comment No. 26-24

The project description does not adequately disclose the location of the offsite truck staging areas or the impacts of truck routes to the Project Site. This section simply states that "off-site truck staging areas located within the City on the north side of Venice Boulevard, west of Guthrie Avenue and on the north side of Venice Boulevard, east of Normandie Avenue." (DEIR, p. II-35.) The DEIR does not provide a map of these locations. However, both of these truck staging areas are directly adjacent to sensitive receptors including a school, community center, and a hospital. The DEIR fails to disclose these impacts by not properly disclosing the locations. The DEIR should include a map showing the location of the staging areas and adjacent sensitive receptors. (See Figures 02 and 03 in the Ramboll Report.)

Further, not only are these proposed staging areas located directly adjacent to a hospital, community center, churches, school, and cemetery, but they are also located in areas of the City that are already heavily burdened by pollution. The State's California Communities Environmental Health Screening Tool, CalEnviroScreen 4.0, is a screening methodology that is used to identify California communities that are disproportionately burdened by multiple sources of pollution. The two areas proposed as staging areas are in the 98th and 73rd percentile for "pollution burden." Adding the staging uses to these areas would further increase the already high pollution burden in these communities. The impacts of increased pollution, noise, pedestrian safety, and other risks to these communities should be assessed and disclosed in the DEIR. The DEIR needs to be recirculated with this new information.



Why were these areas chosen as the staging areas? Were other staging areas evaluated? If yes, where were the other staging areas evaluated and what were the impacts to the alternative staging areas as compared to the designated sites? Have these areas been selected as staging areas for other projects? If so, what is the cumulative impact to these communities of air quality, noise, congestions, safety, etc.?

Response to Comment No. 26-24

The Draft EIR evaluated two potential off-site construction staging areas and demonstrated that impacts associated with the use of these staging areas would be less than significant. In addition, graphics depicting the location of the two staging areas were provided in Figures IV.I-4 and IV.I-5 of the Draft EIR. However, the two off-site staging areas are no longer proposed to be used as part of the Project's construction activities. Instead, all haul truck staging would occur on-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As shown in Figure 1 of Appendix FEIR-8, two on-site haul truck staging areas would be used. These staging areas would be located along the northern and southern property lines to provide access throughout the Project Site for construction activities, and efficient truck access to these staging areas would be provided from Fairfax Avenue and Beverly Boulevard. Each staging area would have the capacity to accommodate up to 30 trucks. Although the staging area would accommodate up to 30 trucks at the same time, not all of the trucks would be idling at the same time, as each truck is limited to a maximum of 5 minutes of idling per CARB.⁴⁰ Therefore, it is estimated that up to 25 percent of the 30 trucks (eight trucks) would be idling at the same time. As shown in Table II-24 on page II-563, the estimated noise levels associated with the on-site construction staging would be consistent with the existing ambient levels and would not exceed the significance thresholds. In addition, noise levels associated with the on-site construction staging would be a minimum of approximately 10.6 dBA to 29.2 dBA lower than the noise levels from other on-site construction equipment during the grading phase (Table IV.I-10 of the Draft EIR). As such, the on-site construction staging when combined with the other Project construction noise sources analyzed in the Draft EIR would not result in additional measurable noise increase as compared to the Project analysis and would not change any of the significance conclusions in the Draft EIR.

In addition to noise, construction trucks would generate limited groundborne vibration. As provided in Table IV.I-20 and Table IV.I-21 of the Draft EIR, a loaded truck would generate a vibration level of 0.076 inch/second PPV or 86 VdB at a distance of 25 feet. The nearest offsite building to the staging areas (i.e., the commercial building to the south) would be a minimum of approximately 30 feet from the southern staging area.

⁴⁰ Each truck would be limited to a maximum of 5 minutes of idling per CARB regulatory requirements.

**Table II-24
On-Site Construction Staging Noise Levels**

Off-Site Receptor Location	Estimated Noise Levels due to Construction Staging (L _{eq} (dBA))	Existing Daytime Ambient Noise Levels (L _{eq} (dBA))	Significance Criteria (L _{eq} (dBA))	Maximum Noise Exceedance Above the Criteria (L _{eq} (dBA))	Significant Impact Without Mitigation?
R1	59.8	61.1	66.1	0.0	No
R2	51.4	62.8	67.8	0.0	No
R3	58.6	68.5	73.5	0.0	No
R4	53.2	67.7	72.7	0.0	No
R5	58.5	58.9	63.9	0.0	No
R6	45.5	60.4	65.4	0.0	No
R7	53.9	56.6	61.6	0.0	No
R8	64.5	66.9	71.9	0.0	No
R9 (Gilmore Adobe) ^a	52.4	56.0	61.0	0.0	No
<p>^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, <i>A Family Vision – Spanning Three Centuries—The History of the A.F. Gilmore Company</i>, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with on-site construction staging at the Gilmore Adobe would be less than significant.</p> <p>Source: AES, 2023</p>					

The groundborne vibration at 30 feet distance would be 0.058 inch/second PPV, which would be well below the building damage significance criteria of 0.3 inch/second PPV (applicable to the commercial building to the south). The nearest offsite sensitive receptor to the staging areas is receptor location R8, which is a hotel use along Fairfax Avenue located approximately 95 feet from the southern staging area. The groundborne vibration at a distance of 95 feet would be 68.6 VdB, which would be below the human annoyance significance criteria of 72 VdB. Vibration levels due to trucks at the onsite staging areas would be lower at other offsite sensitive receptors further away, as vibration levels dissipate with distance. As such, vibration impacts associated with the onsite construction staging areas when combined with the other Project construction vibration sources analyzed in the Draft EIR would be less than significant.

As the two off-site haul truck staging locations described and evaluated in the Draft EIR are no longer proposed, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. Please refer to Response to Comment No. 26-E.1-17 regarding on-site vehicle travel and idle exhaust emissions. Contrary to the commenter's assertion, the Draft EIR disclosed and analyzed the air quality impacts of truck routes to the

Project Site. Project haul routes for both loaded and empty construction trucks are also disclosed in the LADOT approval letter dated June 30, 2022. As accurately pointed out by the commenter, census tracts experiencing high levels of pollution burden are present in the vicinity of the Project area. Pollution burden is estimated based on pollution levels and population densities; thus, pollution burden tends to be higher in areas with higher populations which are nearer to sources of pollution, such as near highways. Therefore, where haul routes connect to and travel along highways, routing through high-burden areas is unavoidable.

The cumulative impacts of Project implementation, including construction haul truck routing, with respect to air quality, noise, congestion, and pedestrian safety are discussed in Section IV.A, Air Quality, Section IV.I, Noise, Section IV.K, Transportation, and Sections IV.J.1 and J.2, Public Services, of the Draft EIR, respectively.

The Draft EIR disclosed all elements of the Project required by CEQA and comprehensively analyzed the Project's potential impacts in accordance with CEQA. Thus, contrary to the commenter's assertion, recirculation is not required. This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-25

II. IMPACTS AND MITIGATION MEASURES

A. Air Quality

As detailed below and in the attached **Exhibit 1**, *Review of the Draft Environmental Impact Report for the TVC 2050 Project* prepared by Ramboll US consulting, Inc. (the "Ramboll Report"), the air quality analysis is deficient, contains numerous inconsistencies and errors, and is misleading. Moreover, as noted in the previous discussion regarding Project Description, once a stable and finite Project description is established, the air quality analysis will need to be revised and recirculated.

Failure to Prepare Health Risk Assessment

Despite the Project Site, haul routes, and staging areas being very close (next door) to sensitive receptors, the DEIR failed to prepare a Health Risk Assessment (HRA). As shown in Figure IV.A-4, the Project Site is surrounded by sensitive receptors, such as residences and schools.

The Project's construction and operations include sources of diesel particulate matter (DPM) and other toxic air contaminants (TACs) that could potentially have a significant health risk impact on the surrounding receptors due to: (1) the large areal scope of construction activity (25 acres); (2) the close proximity to sensitive receptors; (3) the length of construction, which could occur intensively over a 3 year period or over 20 years; (4) the additive emissions from concurrent operational emissions (such as diesel and other trucks providing production support activities and servicing on-site warehouses and facilities); (5) over 500 trucks per day visiting the Project Site for operations (which, as indicated herein, likely is underestimated); (6) the 772,000 cubic yards of excavated soil and 50,000 cubic yards of imported soil to be moved to and from the Project Site necessitating 60,000 or more dump trucks (totalling [sic] approximately 120,000 trips); (7) at least 100,000 or more heavy diesel trucks required to bring concrete, rebar, steel, glass, exterior walls, construction material, construction equipment, facility equipment, and other required materials to the Project Site; and (8) the potential release of VOCs, methane, and other oil-related products during dewatering activities and/or soil moving activities.

Given all of these factors, why did the DEIR not include an HRA? A detailed HRA should have been prepared to calculate and disclose to the public the increased risk of cancer and other health impacts (e.g., acute, chronic, and cancer risk) caused by the Project's construction and operational emissions, particularly on the community's most vulnerable residents.

Response to Comment No. 26-25

Please refer to Topical Response 1, Clearly Defined Project Description and Specific Plan, for a detailed explanation of how Section II, Project Description, of the Draft EIR is accurate, stable, and finite, and how the Draft EIR disclosed all elements of the Project required by CEQA and fully evaluated the environmental impacts of the Project.

Please see Response to Comment Nos. 26-24, 107-2, and 124-6 regarding staging and haul routes.

See Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline and the long-term buildout impact assessment.

See Response to Comment No. 26-E.1-21 for a discussion of sensitive receptor proximity to the Project Site.

See Section E, Truck Trips, of Topical Response No. 10, Trip Generation, and Response to Comment No. 26-E.1-16 for a discussion of Project truck trip generation during operation, rebutting the comment's incorrect claim that the Project will generate 500 truck trips per day.

See Topical Response No. 14, Construction Vehicle Impacts, regarding truck trips during Project construction.

Refer to Response to Comment No. 13-6 regarding potential releases during dewatering or soil-moving activities.

Additionally, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include diesel exhaust from trucks and equipment with receptors located adjacent to the Project Site. As discussed in Response to Comment No. 26-E.1-2, the quantitative HRA confirms the Draft EIR's conclusion that health risks from the Project would remain below the applicable significance thresholds. Please refer to Response to Comment No. 26-E.1-2 for additional details on health impacts to nearby sensitive receptors.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer also to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-26

Failure to Identify All Sensitive Receptors

Moreover, Figure IV.A-4 and the DEIR generally fails to identify all sensitive receptors in the vicinity of the Project. For example, the DEIR fails to label the Gilmore Adobe and the Morasha Hebrew Academy as sensitive receptors. An EIR must comprehensively canvass the entire area to identify residences, transient lodgings (hotels), schools, day care facilities, libraries, churches, hospitals, nursing homes, playgrounds, and parks to adequately assess health impacts. Does the existing site have any child-care facilities on-site?

The Project Site itself would contain sensitive receptors. Depending on the phasing of the Project, sensitive receptors may be on-site and active when additional phases are constructed. On pages 15–17 of Chapter D.II Project Description, the Project's Specific Plan is described as having flexible land uses. In addition to the permitted land uses of production-related and ancillary uses, it is unknown if the Specific Plan sensitive receptor uses and facilities such as childcare and educational facilities, sleeping quarters for certain on-site personnel, and recreational facilities will be constructed and when. In addition, the proposal to permit any C2 use has an extensive number of potential sensitive receptors. A comprehensive HRA must be prepared in order to accurately gauge impacts on all offsite and on-site sensitive receptors.

Response to Comment No. 26-26

The air quality analysis in Section IV.A, Air Quality, of the Draft EIR correctly identified and analyzed impacts to sensitive receptors consistent with the SCAQMD LST methodology. The SCAQMD in their LST methodology identifies sensitive receptors to be a receptor, such as residence, hospital, or convalescent facility, where it is possible that an individual could remain for 24 hours.⁴¹ The Project would not include uses where individuals could stay for extended periods (years) but would, instead, as listed on page II-16 in Section II, Project Description, of the Draft EIR, include sleeping quarters for certain on-site personnel, such as security guards with long overnight shifts. These uses would not be considered sensitive receptors. Please note that the Project Site does not have existing childcare uses. Refer to Response to Comment Nos. 5-6 and 224-1 regarding the uses permitted under the proposed Specific Plan.

Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours but are present for shorter periods of time, such as 8 hours. LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, were applied to receptors, such as industrial or commercial facilities in the vicinity of the Project, since it is reasonable to assume that a worker at these sites could be present for periods of 1 to 8 hours, or recreational facilities included in the CEQA analysis.

The SCAQMD LST screening methodology instructs users to identify the maximum daily Project emissions and the distance to the nearest off-site receptor. Data tables are provided to identify the maximum allowable Project emissions based on distance to the nearest off-site receptor. If Project emissions are below the lookup table allowable emissions, then significant local impacts are not expected. As shown in Table IV.A-10 and Table IV.A-11 of the Draft EIR, Project localized construction and operational emissions would remain below the significance thresholds for receptors located within 25 meters of the Project Site. A 25-meter receptor distance is the closest receptor distance on the SCAQMD LST lookup tables and may be used to analyze receptors located closer than 25 meters, including any on-site receptors. Use of the SCAQMD LST 25-meter receptor distance is, therefore, representative of impacts for on-site uses (e.g., any proposed childcare use), and the proper application of the LST methodology demonstrates that there would be no significant impacts to on-site uses, including any proposed childcare use. Therefore, the Project's air quality analysis properly analyzed localized impacts and identified sensitive receptors consistent with SCAQMD LST methodology.

⁴¹ SCAQMD, Final Localized Significance Threshold Methodology, June 2003, revised July 2008, p. 3-2.

The receptors identified in the comment, the Gilmore Adobe and the Morasha Hebrew Academy, are specifically identified in the Draft EIR, as discussed on page IV.A-29 of the Draft EIR. Figure IV.A-4 (Air Quality Sensitive Receptors Locations) on page IV.A-30 of the Draft EIR (and as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR) identifies Morasha Hebrew Academy as an educational use. While the Gilmore Adobe was not specifically identified in Figure IV.A-4 as it is a commercial use, the closest sensitive receptor land use to the Project Site would remain to be the residential use located immediately adjacent to the east of the Project Site (Broadcast Center Apartments). As shown in Table IV.A-10 and Table IV.A-11 of the Draft EIR, Project localized construction and operational emissions would remain below the significance thresholds for receptors located within 25 meters of the Project Site.

Moreover, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include diesel exhaust, architectural coatings, char broilers and other fugitive emissions. Receptors analyzed in the HRA include sensitive uses and commercial uses to the south of the Project Site.⁴² Although not required for CEQA purposes, Project on-site receptors, including any proposed childcare use, were also analyzed for informational purposes and impacts were determined to be less than significant, confirming the conclusions in the Draft EIR. Please refer to Response to Comment No. 26-E.1-2 below for additional details on health impacts to nearby sensitive receptors.

Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the permitted uses under the proposed Specific Plan. A childcare use is the only sensitive use that would be permitted, and, as explained above, would not be subject to significant localized air quality impacts based on the SCAQMD LST methodology. The childcare use would also be sited and constructed in accordance with all applicable regulatory requirements. In addition, a PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to address emergency generators to ensure all applicable regulatory requirements, as well as the additional 100-meter buffer distance, are taken into account in the siting of any childcare use on the Project Site. Project Design Feature AIR-PDF-2 requires all new emergency generators to meet the emission standards included in Table 1

⁴² Based on the 2018 book, *A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company*, which was written by the A.F. Gilmore Company, the Gilmore Adobe has been home to the corporate offices of the A.F. Gilmore Company since 1976 (see page 59). This is consistent with the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project, which identified the Gilmore Adobe as a commercial office use (The Grove at Farmers Market Addendum to Final Environmental Impact Report dated July 15, 1999 [EIR No. 87-515-SUB(ZV)(YV)(ZC); State Clearinghouse No. 87102102]). Accordingly, the Draft EIR correctly identified and analyzed the Gilmore Adobe as a commercial use. Nevertheless, for informational purposes, the HRA provides an analysis of the Gilmore Adobe as a hypothetical sensitive receptor.

of SCAQMD Rule 1470 and USEPA Tier 4 Final standards. The existing “Big Blue” emergency generator (SCAQMD Permit No. 618456), which is shown in Figure IV.F-1 of the Draft EIR (and Figure IV.F-1 as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR), results in 0.08 grams per brake horsepower-hour (g/bhp-hr) of DPM and meets the SCAQMD Rule 1470 standard (0.15 g/bhp-hr of DPM) for emergency generators located greater than 50 meters (approximately 164 feet) from sensitive receptors and 100 meters (approximately 330 feet) from schools. To be conservative, the childcare use, if any is proposed in the future, would be located a minimum of 330 feet from the existing Big Blue generator if such generator remains in use.

Comment No. 26-27

Flawed Assumptions about Distances to Sensitive Receptors

The DEIR relies on the use of SCAQMD’s Localized Significant Thresholds (LSTs) to evaluate the localized impacts of criteria air pollutants (NO_x, CO, PM₁₀, and PM_{2.5}) during construction and operation. The DEIR says the closest sensitive receptors to the Project Site are the residential uses located east of and directly adjacent to the Project Site (the Broadcast Center Apartments). This assumption may be wrong given the presence of the Gilmore Adobe. But even if correct, the DEIR incorrectly assumes that these residential uses are 25 meters (82 feet) away. However, these apartments are much closer than 82 feet away, which is readily apparent when looking at the maps in the DEIR. In fact, there is only a limited setback between the Broadcast Center Apartments and the Project Site. What’s more, the apartments have open air balconies and windows that open to the Project Site. Given the lack of detailed Project information, it appears that Project uses with air emissions, such as diesel trucks, generators, mills, etc., could be immediately adjacent to the residential receptors.

The DEIR also fails to perform site-specific emission dispersion modeling after the LST was exceeded. At a minimum, the DEIR should have run a project-specific analysis using the AERMOD dispersion model, which would show how the concentration of pollutants is dispersed from the area and volume resources to nearby sensitive receptors.

Moreover, construction emissions are compared against an assumed 5-acre site. However, if the Project pursues a phased approach to construction, such as constructing a parking structure first, the area of land under construction at any given time may be less than 5 acres. The LST thresholds for smaller land sizes are more stringent, and thus the DEIR analysis is not appropriately conservative and the Project’s LST impacts would be greater than disclosed. Given that the Project may have construction areas much smaller than 5 acres, the DEIR must evaluate the potential impact for construction areas less than 5 acres.

Response to Comment No. 26-27

Please refer to Response to Comment No. 26-E.1-21 regarding the analysis of localized air quality impacts and the use of SCAQMD's LST methodology (i.e., applicability of a 5-acre site and 25-meter receptor distance). While the Gilmore Adobe was not considered a sensitive receptor in the Draft EIR, the receptor is located farther than the analyzed distance of 25 meters. As shown in Table IV.A-11 and discussed on pages IV.A-66 and IV.A-73 in Section IV.A, Air Quality, of the Draft EIR, with the application of mitigation measures, localized Project construction emissions would result in less-than-significant impacts based on the SCAQMD LST screening methodology. Therefore, detailed dispersion modeling is not required.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project's potential impacts.

Comment No. 26-28**DEIR Makes Unsupported Statements about Atmospheric Dispersion of TACs**

At page IV.A-31, the DEIR states that sensitive receptors "would experience lower air quality impacts from potential sources of emissions at the Project site due to atmospheric dispersion effects." However, the DEIR does not conduct any modeling of atmospheric dispersion, which can and should be conducted as part of an HRA. The DEIR likely avoids this HRA air dispersion modeling because, among other reasons, the Project would create a canyon filled with exhaust from trucks and other emissions sources on the eastern boundary of the Project Site. The Project proposes a new internal street at the eastern property boundary that would be used as a roadway for diesel trucks. The Project building directly across the truck roadway from the Broadcast Center Apartments could be up to 160 feet tall and the Broadcast Center Apartments are 5 stories, leaving nowhere for the DPM from the hundreds of trucks accessing through the new Project roadway and other TACs to disperse. Another internal street with vehicular and truck access is proposed to the south of the apartments with an up to 130-foot Project building next to the internal roadway. As detailed in Ramboll's Report, traffic emissions in the wake of a development with a proposed height of 130–160 feet can result in an increase in annual concentrations of approximately 5% while peak concentration may increase by up to 15–20%. The impact will be greater for particulate matter (PM) concentrations as compared to NOx concentrations. In short, the balconies of the Broadcast Center Apartments would be subject to diesel exhaust, soot, and other air quality impacts and expose residents to these emissions.

The DEIR also fails to analyze the air quality impacts caused by the trucks, generators, food trucks, equipment, and other production-related vehicles that will be staged in the

basecamp and production support areas. Some of these areas are below grade and will not experience the same type of atmospheric dispersion that would occur in an open setting. However, portions of the below grade areas may be open to the sky if developed similar to the site plans submitted to the City with the applications and available at the City's Project website.² It is also unclear where the venting for the below grade areas and subsurface systems will be located and whether the emissions were factored into the air quality and GHG analyses. The DEIR must include modeling of intake and exhaust of all below grade areas. Is there any restriction as to where this venting can be located? Can it be located next to the residential uses?

² <https://planning.lacity.org/pdiscaseinfo/caseid/MjO3Mjg20>.

Response to Comment No. 26-28

The commenter inaccurately claims that the Draft EIR must include dispersion modeling. Please refer to Response to Comment No. 26-26 regarding the analysis of localized construction and operational air quality impacts. As stated on page IV.A-31 in Section IV.A, Air Quality, of the Draft EIR, the air quality analysis was performed consistent with SCAQMD LST methodology. This methodology employs intentionally conservative dispersion parameters, derived from dispersion modeling conducted by SCAQMD which incorporated local meteorology and background pollutant levels, to evaluate whether estimated emissions from a project site would have the potential to result in local air quality impacts. Following the LST methodology, the nearest receptor to the Project Site would be the most likely to have the potential for local air quality impacts. The Draft EIR's statement that sensitive receptors "would experience lower air quality impacts from potential sources of emissions at the Project Site due to atmospheric dispersion effects" is in specific reference to those receptors which would be farther from the Project Site than the nearest receptor and is, therefore, accurate. Tables IV.A-10 and IV.A-11 on pages IV.A-70 and IV.A-74, respectively, in Section IV.A, Air Quality, of the Draft EIR show that localized construction and operational emissions would remain below the significance thresholds for receptors located within 25 meters of the Project Site after the application of mitigation. It should be noted that a 25-meter receptor distance is the closest receptor distance on the SCAQMD LST lookup tables and may be used to analyze receptors located closer than 25 meters (SCAQMD, Final Localized Significance Threshold Methodology, page 3-3, 2008). Therefore, the Project's air quality analysis properly analyzed localized impacts and identified sensitive receptors consistent with SCAQMD LST methodology.

As discussed on page II-7 of Section II, Project Description, of the Draft EIR, basecamp areas would include parking, storage of mobile facilities, support vehicles, etc. While existing production activities occasionally require the use of small portable generators when electrical hookups are not available, the Project will provide a sufficient number of electrical hookups in basecamp areas such that use of portable generators will

not be needed. Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of additional electrical hookups at all basecamp areas. Diesel trucks, including food trucks accessing basecamps, would travel on-site for short distances and would plug into electric power when parked in below or above Project Grade areas. Diesel trucks would also comply with a CARB-mandated airborne toxic control measure (ATCM) which limits idling to no more than five minutes at a time. As discussed in Topical Response No. 10, Trip Generation, trip generation estimates in the Draft EIR included trips associated with basecamp operations. Also note that, as discussed in Response to Comment No. 26-121, while outdoor production activities may occur above-Project Grade, no active production activities or uses would be located in the parking and basecamp areas below Project Grade. As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, all of the proposed uses, areas and activities were fully accounted for in the impact analyses in the EIR. Basecamp uses are specifically accounted for in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR).

Underground parking exhaust fans are typically placed inside the parking structure to allow for energy efficiency and minimize potential noise from the mechanical equipment. While there are no restrictions where the venting for the below grade areas will be located, venting is typically run vertically through the parking structure and out through the top level of the parking structure. Ventilation for underground parking and basecamp areas will comply with Section 120.6(c) of the California Building Code (CBC), Mandatory Requirements for Enclosed Parking Garages, which mandates a minimum flow rate of 0.15 cubic feet per minute per square feet when the structure is scheduled to be occupied. As discussed on page IV.A-45 of Section IV.A, Air Quality, of the Draft EIR, a CO exceedance of ambient air quality standards (AAQS) is caused by vehicular emissions, primarily when idling. Therefore, the CBC requires installation of at least one CO sensor per 5,000 square feet and also requires automatic controls and/or devices that would increase the air flow to maintain acceptable CO concentrations well below the AAQS (health protective of the underground parking users). This, in turn, would protect nearby sensitive receptors as the vented air from the underground parking would be further diluted with ambient air further reducing the CO concentrations below the AAQS.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include, among others, diesel exhaust, architectural coatings, char broilers, production and basecamp operations, Mobility Hub operations, venting, parking operations (e.g., venting from parking structures), and other fugitive emissions. Receptors analyzed in the HRA include sensitive uses and commercial uses to the south of the Project Site. Project on-site receptors were also analyzed for informational purposes. As discussed in Response to Comment No. 26-E.1-2, the

quantitative HRA confirms the Draft EIR's conclusion that health risks from the Project would remain below the applicable significance thresholds. Please refer to Response to Comment No. 26-E.1-14 for additional details on health impacts to nearby sensitive receptors.

Please note that the Project would not include a new internal "street" as incorrectly stated in the comment. Rather, the Project would include internal circulation pathways and lanes as is typical in any development project.

Comment No. 26-29

Truck Trips Are Artificially Lowered

Page IV.A-72 of the DEIR claims, per SCAQMD guidance, that since the Project site would not exceed 100 trucks visits per day, an HRA is not required. What is the basis for the DEIR's conclusion that truck trips will be less than 100 trucks per day? What range of permitted uses were assumed in drawing that conclusion? Warehouse is a permitted use—how much warehouse was assumed for that calculation? What amount of production support was assumed and how many daily trucks associated with that production support? How many stages were assumed and how many truck trips were assumed per stage? How much office was assumed and how many truck deliveries for the offices was assumed? The amount of trucks calculated, the type of trucks, and basis for the calculation of daily truck trips should be disclosed.

Moreover, the DEIR's own analysis is not consistent with the statement that the Project will not exceed 100 trucks per day. On page 98 of Appendix B, the Total Permitted Land Uses CalEEMod winter run presents the fleet mixes for each of the land uses (page 103) and the average daily trip rate (page 102). Combining these, it is estimated the number of truck trips per day to be 559 one-way trips/day, or 279 round trips/day for the Project (assuming the truck types include light-heavy duty trucks, medium-heavy duty, and heavy-heavy duty trucks). How can the DEIR make conclusions based on assumptions that contradict the technical information appended to the DEIR?

The DEIR needs to correct this inconsistency as there is no way to understand what is the correct assumption. Further, without clarity as to which permitted uses will be built and to what square footage, it is not supportable to assume that the 100 truck per day threshold will not be exceeded.

More importantly, given that the DEIR's own analysis estimates that the number of truck visits is greater than 100, then the DEIR fails its own criteria to determine if an HRA is required. An HRA must be prepared and a recirculated DEIR made available to the public.

Response to Comment No. 26-29

Please refer to Response to Comment No. 1-4 for a discussion of the 100 truck per day screening criteria. Please refer to Topical Response No. 10, Trip Generation, and Response to Comment No. 26-E.1-16 for a detailed explanation of the trip generation assumptions which went into the Draft EIR's truck trip estimates. As discussed therein, trip generation estimates were based on Project-specific vehicle trip data from existing facility operations, rather than CalEEMod default trip generation parameters of representative land uses for the facility's subtypes. Thus, no specific breakdown of facility land use subtypes was necessary for trip generation estimates. A more detailed overview of facility vehicle trips is provided in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR).

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Topical Response No. 3, Permitted On-Site Uses, regarding the Conceptual Site Plan and the size of the five permitted uses.

As discussed in Response to Comment No. 26-E.1-2, the quantitative HRA confirms the Draft EIR's conclusion that health risk from the Project would remain below the applicable significance thresholds (see Appendix FEIR-10 of this Final EIR).

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-30**Hauling Trips are Underestimated, Failing to Disclose Construction Air Impacts**

The DEIR underestimates the number of hauling trips evaluated in the CalEEMod runs, thereby underestimating the air quality impacts of construction. The CalEEMod analysis must be corrected and the DEIR recirculated.

On page 3 of Appendix B, it is noted that it is expected that haul trucks will dispose of exported soil materials at United Rock Products Landfill in Irwindale. Following the haul route given on page 8, this path results in ~30 miles the haul truck would need to travel. On top of that, the DEIR has assumed that up to 60,000 cubic yards of hazardous soil materials, which is reportedly a subset of the maximum 772,000 cubic yards of export, 'Will be exported to Button-willow Landfill in Kern County which is 145 miles away. When reviewing the CalEEMod runs (on pages 26 and 311 of Appendix B), it shows that the default hauling trip number given in the CalEEMod run of 102,750 trips was reduced to

8,572 trips. This updated trip number was noted to be associated with the 60,000 cubic yards of contaminated soil exported. The hauling trip length was also changed from the default of 20 miles to 145 miles.

Based on this and the comment below, it appears that the CalEEMod run only accounts for hazardous waste haul trips and the other 94,178 haul trips with a trip length of ~30 miles have not been accounted for in the emissions inventory analysis.

On pages 28, 53, 131, 156, 180, 205, and 312 of Appendix B, there is another line item in the CalEEMod defaults table for a trip number for hauling trucks of 2,255 that was changed to 0. It is not clear in the analysis why this was done. Furthermore, the CalEEMod run does not appear to be accounting for the hauling trips associated with the more than 700,000 cubic yards of non-hazardous material after this on-site import is accounted for. It is also important to note that the estimate of 60,000 cubic yards of contaminated soil export may in fact be underestimated given the known conditions at the Project Site that necessitated preparation of a soil management plan. The DEIR should be revised to correct the discrepancy and update the analysis accordingly.

The true number of haul trips for soil conservatively could be up to 91,923 after accounting for the soil import/export transfer on-site and the hazardous waste trips. This number is over ten times higher than what was presented in CalEEMod currently and could result in an additional ~2,750,000 VMT by the hauling trucks that has not been accounted for in the Project emissions inventory. Use of this corrected number would more than double the VMT associated with hauling trips based on the current CalEEMod runs. This does not account for other construction truck trips for delivery of concrete, steel, and other construction material.

The DEIR should be revised to include a complete list of the estimated trucks needs to construct the Project over a 3-year period and a 20-year period and the associated trip lengths. Please provide a full description of the total number of trucks for Project construction, including excavation, rebar, concrete, steel, construction material and equipment, etc.

Response to Comment No. 26-30

This comment misrepresents information provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR and instead identifies some limitations of CalEEMod 2020. The comment cites that CalEEMod provides a total of 102,750 haul truck trips for import/export. CalEEMod 2020 provides two truck purposes vendor and haul, for each construction phase. Vendor trips are input as peak daily and haul trips are input as the total number of haul trucks trips over the grading/export duration. To account for peak daily export activity, haul truck trips were input into CalEEMod as 640 vendor trips of which

600 trips would be for hauling of import/export and 40 trips could be used for deliveries or import/export. All trips were assumed to be of the hauling vehicle class and trip length was adjusted to account for hauling to import/export site of approximately 30 miles. As identified in the CalEEMod input file, grading/excavation would occur over 185 days, which is equivalent to hauling of up to 777,777 cubic yards (300 hauls x 14 cy truck x 185 days) or 111,000 haul trips. Please note that the grading phase also includes up to 50,000 cubic yards of import, and it was assumed that export haul trucks would provide the imported materials on return trips. Furthermore, it was conservatively assumed that the 40 vendor trips could be used for hauling exported soil with the same 30-mile trip distance, which would account for an additional 7,400 truck trips. This comment also misconstrues the hauling trip information related to contaminated soil. The comment cites that the CalEEMod runs default hauling trip number was reduced from 102,750 to 8,572 and the trip length was changed from 20 to 145 miles. This comment acknowledges that the Draft EIR provided a note that the 8,572 trips were associated with 60,000 cubic yards of contaminated soil export and that the trip distance was increased from 20 to 145 miles. Therefore, it should be clear why the default number of trips and trip distance was modified as the construction activity was not related to general import/export. As shown in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the modeling included 8,572 haul trips for the additional VMT (145 miles per trip) related to any hazardous soil materials (60,000 cy / 14 cy truck capacity x 2 trips). Based on the provided information above, the Draft EIR analysis accounted for a total of 126,972 (111,000 + 7,400 + 8,572) truck trips during the grading phase, which is conservative and more than the CalEEMod default (102,750 truck trips). Refer to Response to Comment No. 26-83 regarding the conservative estimate of 60,000 cy of contaminated soil.

Please note that this comment also misstates the number for hauling truck trips associated with demolition activities. Once again, the truck trips were input as vendor trips to account for peak daily activity. As shown on the same pages in the Draft EIR cited in this comment (i.e., pages 28, 53, 131, 156, 180, 205, and 312 of Appendix B), the Project would include 80 daily truck trips over the 65-day construction period (5,200 total truck trips) and is more than double the CalEEMod number of demolition truck trips (2,255). To summarize, the CalEEMod analysis included in the Draft EIR correctly reflects peak daily truck trips and distances during grading/export and demolition, and all construction-related VMT has been accounted for in the Project emissions inventory. No changes to the air quality analysis are necessary based on this comment.

Please refer to Details of Project Buildout and Construction Activities and Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendices FEIR-8 and FEIR-9 of this Final EIR, respectively) for a detailed discussion of the long-term buildout scenario. As discussed therein, with a long-term buildout and operation of some facilities on-site while construction is occurring, only a single excavation operation could be accommodated on-site, thus reducing the excavation activities and

associated haul truck trips by half. A single excavation operation would only result in half the number of pieces of equipment operated and result in 300 daily haul truck trips instead of 600 trips. Other construction activities, such as building construction and finishing, would likely occur at a further-reduced level but were still assumed to occur at 50 percent of the maximum daily intensity for a conservative analysis.

Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional discussion regarding construction truck trips.

Comment No. 26-31

DEIR Contains Flawed Trip Counts and VMT Reduction Claims

The significant flaws in trip counts and VMT reduction claims detailed elsewhere in this letter ripple throughout the DEIR, rendering the Air Quality Section, associated appendices, and CalEEMod runs inadequate. Some of those flaws are further highlighted below.

Visitor Trips

The DEIR does not properly account for visitor trips. As outlined in the Project Description on page II-26, the Project includes a Mobility Hub, which it intends to provide services to visitors. However, as referenced in the Appendix M Sub-appendix E Attachment B, the persons taken into account in the overall VMT calculation only include “employees,” and trips taken into account only include those within the land use “Studio, Production, and Office.” Why was this distinction made? What support is there for only including those trips? Furthermore, as referenced in Appendix B section 4.2 Trip Summary Information, calculations of annual VMT and trip rate values are only performed for trips within the land use “User Defined Commercial,” while trips within other land use types are excluded. Visitor trips must be added and the overall trips recalculated.

Also, it is unclear how and to what extent visitor trips from audience shows were included in the analyses. The Television City studio is unique in that all of its existing stages are rated for audience shows. The Project provides for 350,000 or 450,000 sf of stage, which could be up to 19 or more stages that could accommodate 300 or more audience guests. The DEIR does not include any limitations as to the amount or operation of audience shows. Absent any limitations, based on the past use of this studio, there could be 5,000 or more visitors a day to audience shows at the Project Site. How were the trips associated with these visitors included in the overall Project trips? Were they included in the VMT? Are these trips factored into the air quality analyses? How? If not included, the DEIR must be revised to include the analyses which account for these and other visitor trips to this proposed “Regional Center”. [sic]

Response to Comment No. 26-31

The trip counts and VMT reductions in the Draft EIR are not flawed. Rather, the trip counts and VMT analysis in the Draft EIR were completed in accordance with LADOT procedures and CEQA. Refer to Topical Response No. 8, Vehicle Miles Traveled, and Topical Response No. 10, Trip Generation. As discussed in Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, the Project trip totals calculated by the VMT Calculator includes all trips generated by the Project (employees, visitors, audience members, production vehicles, deliveries, etc.). These trip totals were used in the air quality analysis in Section IV.A, Air Quality, of the Draft EIR. As such, the air quality analysis accounts for all Project trips, including visitor and audience trips. Also refer to Section A of the Topical Response regarding the evaluation of VMT impacts based on the daily work VMT per employee, consistent with the OPR Technical Advisory.

Figure 1 on page 11 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the Project would contain 12 sound stages which is consistent with the 350,000 square feet of total sound stages shown in Table 7 on page 82 of the Transportation Assessment.

The Mobility Hub proposed for the Project would serve employees, visitors, or audience members by providing multi-modal transportation services to or from the Project Site. As discussed in detail in Topical Response No. 10, Trip Generation, the studio audience trips are inherent in the empirical trip generation rates that were used in the Transportation Assessment (Appendix M.1 of the Draft EIR) to estimate Project trips. There is no evidence provided by the commenter to support the statement that the Project could have 5,000 visitors per day. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a detailed discussion of the number of audience stages and audience visitors under existing conditions and with the Project.

Because most of the trips to and from the Project Site are generated by employees, the VMT analysis was conducted based on the Project serving as an employment destination. As discussed in detail in Topical Response No. 8, Vehicle Miles Traveled, the VMT analysis followed guidelines from *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Governor's Office of Planning and Research, December 2018) and appropriately focused on home-based-work attraction trips for estimating work VMT per employee. When other trip types are a small component of overall VMT, page 5 of the OPR Technical Advisory recommends that the focus of VMT reduction efforts should be on trips between home and work. As described in Topical Response No. 10, Trip Generation, the visitor trips to the Project Site represent a small percentage of the total trips and therefore the focus on work VMT per employee is the appropriate measure of the potential transportation environmental impacts of the Project.

Comment No. 26-32**VTM Reductions are Overestimated**

On Page IV.A-531 the DEIR assumes VMT reduction features result in an approximately 37% reduction in overall VMT, citing SCAG RTP/SCS strategies as the basis of the reductions in the length and number of automobile trips. However, as described in more detail in the GHG Section of the Ramboll Report, CARB's Draft SB 150 2022 Progress Report (https://ww2.arb.ca.gov/sites/default/files/2022-06/2022_SB_150_Main_Report_Draft_1.pdf) indicates that most trends (e.g., land use and housing trends, travel behavior, per capita VMT, etc.) “demonstrate limited progress in meeting the targets through 2019” and “many trends moved in the wrong direction, away from advancing climate goals and showing worsening inequality.” The report concludes that “Californians are driving more... despite State planning statutes that encourage better transportation and planning decisions.” In other words, the DEIR's reliance on a plan that has been found inadequate renders the assumed VMT reductions flawed.

The DEIR must identify realistic VMT reductions (if any) that can be attributed to the Project. What evidence supports a 37% reduction in overall VMT that is based in empirical data? Why is the City using 37% when the existing data demonstrates the actual percentage is much lower? The analysis should be re-run without the assumed reduction.

The number of parking spaces being built also suggests the Project applicant also assumes the use of public transit is overstated. The Project proposes 3 spaces for every 1,000 square feet of office. This is above the LAMC's standard requirement of 2 spaces for every 1,000 square feet of office. How does the Project justify a 15% trip reduction (and concomitant) reduction in VMT when a higher rate of parking is proposed? What evidence, is there to support the 15% reduction in the face of the Project's proposed parking?

Response to Comment No. 26-32

Please refer to Response to Comment No. 26-E.1-22 for a discussion of the 37 percent reduction in overall VMT with incorporation of TDM measures and in comparison to the MXD VMT provided in the LADOT VMT Calculator.

The proposed rate of three parking spaces per 1,000 square feet of office does not conflict with the 15-percent transit usage assumption. Consistent with Table 1 of the City's *VMT Calculator Documentation Version 1.3* (May 2020), the Project assumes four employees per 1,000 square feet of office space. With 15 percent riding public transit, there are 3.4 employees per 1,000 square feet using other modes, including many drivers. Refer to Section A, TDM Effects on Trip Generation, of Topical Response No. 11, Transportation Demand Management, for a detailed discussion of the 15-percent trip

generation adjustment. Refer to Topical Response No. 13, Parking, for additional information on the validity of the Project's proposed parking supply.

Comment No. 26-33

Overlapping Construction and Operational Emissions Not Properly Calculated and Analysed [sic]

Has the applicant provided a construction phasing schedule for the 20-year construction scenario? Without that information how could the DEIR analyze the emissions associated with a 20-year construction plan?

The DEIR does not properly evaluate the emission scenarios throughout the potentially very long duration of Project construction (20 years). While Table IV.A-13 on page IV.A-78 in DEIR Chapter IV purports to show emission estimates for overlapping construction and operation, the underlying model runs for construction emissions were not performed properly.

Construction of the Project could-extend to 2043. As such, it is likely that construction emissions would occur in parallel with operational emissions. The construction emissions presented in the DEIR represent 50% of the maximum daily intensity that was found in CalEEMod runs for each of the five-year increments presented in these tables. But the 50% value was arbitrarily selected, with no substantial evidence supporting its use. The DEIR should provide detailed information as to an estimate of what level of construction activity may occur for the entire duration of a 20-year construction period and then align them with the anticipated operational emissions. The Project applicant should provide information as to a phasing plan for the Project indicating how that Project would be constructed over a 20-year period.

Response to Comment No. 26-33

Please refer to Response to Comment No. 26-E.1-24 for a discussion of the 20-year build out analysis and assumptions.

Comment No. 26-34

DEIR uses old emissions models and, even then, misapplies them

The DEIR fails to utilize or even address the federal 2010 1-hour NO₂ standard. The DEIR must evaluate the Project's potential impact relative to this federal standard. In other words, the DEIR must run the appropriate models and disclose their results.

Also, as explained in the Ramboll Report, the DEIR and appendices lack basic information and the emissions modeling is akin to a black box for which even technical experts have difficulty understanding or replicating the results. It is virtually impossible to “connect the dots” in the analyses.

- The DEIR does not utilize the most recent version of CalEEMod and the Emission FACtor (EMFAC) model. The DEIR uses CalEEMod2020.4.0, which in turn uses EMFAC2017. EMFAC2021 has been available on the EMFAC web tool for over a year and is used in CalEEMod2022. Please re-run the analysis using the EMFAC2021 model.
- The DEIR does not provide complete technical documentation in the appendices for the air quality and GHG analyses, and so it is not clear if the peak daily emissions are represented in the DEIR. The missing output files prevent the reviewer from verifying the technical analyses and results of the analysis. The information must be provided in a recirculated DEIR.
- There are numerous assumptions in the CalEEMod analysis that do not appear to be consistent or accurate, such as unsupported changes in energy intensity factors.
- The DEIR does not adequately evaluate the various types of permitted uses that would be allowed on the Project Site. Among the various permitted uses are: fueling stations; vehicle repair; maintenance and storage facilities; warehouses; and helipads. No information is provided regarding the operation of these permitted uses. There is an extensive list of permitted uses that would be allowed, most of which do not appear to be analyzed in the Project’s CalEEMod runs, which only include the following land uses: production offices, sound stages, retail centers, and a restaurant. As a result, the Project’s estimated air quality and greenhouse gas emissions may not be accurate if other permitted uses were constructed.
- Emissions caused by wind-blown dirt are not adequately analyzed in the DEIR. Any excavated soil becomes a potential source of fugitive dust that may be carried throughout the community by wind erosion. The DEIR omits analysis of the impact of fugitive dust from wind and the radius that may be impacted. In particular, the DEIR fails to provide specific analysis of Santa Ana winds that occur periodically on-site and alter the typical wind pattern, resulting in a different impact radius for air emissions. The DEIR omits analysis of impacts from air emissions generated by the extensive cutting, filling, and hauling of soils during construction during Santa Ana wind events, which poses a high risk to health and safety. This omitted analysis of wind erosion and of Santa Ana winds understates the Project’s air quality impacts. The DEIR should evaluate the potential impacts to community from emissions caused by wind.

Response to Comment No. 26-34

Please refer to Response to Comment No. 26-E.1-21 for a discussion of localized construction and operational emissions regarding the federal 1-hr NO₂ standard. The significance conclusions provided in Tables IV.A-9, IV.A-10, IV.A-11, and IV.A-13 of Section IV.A, Air Quality, of the Draft EIR remain unchanged when considering the calculated LST for the federal 1-hour NO₂ standard. Localized impacts remain less than significant.

Please refer to Response to Comment No. 26-E.1-25 for an explanation as to the applicability of the CalEEMod 2020.4.0 version used in the Draft EIR and a discussion of CalEEMod 2022.1.1 results included in Appendix FEIR-9 of this Final EIR for informational purposes.

Please refer to Response to Comment No. 26-E.1-25 regarding technical documentation for the air quality and GHG analyses. The commenter's report incorrectly asserts that the CalEEMod output file provided in Draft EIR Appendix B is missing pages. As discussed in Response to Comment No. 26-E.1-25, documentation and CalEEMod output files provided in Draft EIR Appendix B properly identify Project construction and operational impacts.

Please refer to Response to Comment No. 26-E.1-27 for a discussion of changes to CalEEMod default industrial park land use energy factors to account for Project-specific utility requirements.

Please also refer to Response to Comment No. 26-E.1-27 for a discussion of allowable land uses and the applicability of Project emissions, estimated using CalEEMod, for representative land uses. The Project would not include a fueling station, vehicle repair, or warehouse, and these uses would not be permitted under the proposed Specific Plan. Refer to Topical Response No. 3, Permitted On-Site Uses, and Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Response to Comment No. 26-15 regarding the helipad.

As discussed in Response to Comment No. 26-26, localized air quality impacts were analyzed using SCAQMD's LST methodology. The emission limits from the LST methodology for a given source receptor area (SRA) were developed by SCAQMD based on dispersion modeling incorporating localized meteorological data and background pollutant concentrations. Therefore, since the LST methodology already accounts for the effects of local meteorological conditions, such as Santa Ana winds, the mitigated localized construction impacts, summarized in Table IV.A-11 of the Draft EIR, are appropriate and considerate of localized meteorological conditions.

Comment No. 26-35**DEIR Undercounts Emissions by Failing to Include Basecamps and Mobility Hub in Analysis**

The DEIR does not appear to evaluate emission sources from uses within the basecamps, production areas, and Mobility Hub in its analysis. The DEIR states that the Project is redefining floor area to exclude base camp activities and other production areas; this does not mean that there are not emissions associated with these activities. Whatever the square footage is called, the impacts from how the space is to be used must be analyzed.

The CalEEMod inputs on page 264 of Appendix B lists the land uses that were used to evaluate emissions. It does not appear to include emissions associated with basecamps, certain production areas, or the Mobility Hub. These uses will clearly have emissions associated with them. For instance, as discussed below, basecamps will include diesel trucks, portable generators and other equipment, as may the below production areas. The Mobility Hub will include vehicles coming and going throughout the day, and idling while awaiting pickups. The DEIR's analysis of water usage includes both the basecamps' and Mobility Hub's usage; why wasn't the same analysis done for air quality? The DEIR must be revised to account for emissions from basecamps, all production areas (including all production zones whether included in floor area or not) and the Mobility Hub.

Response to Comment No. 26-35

The trips associated with basecamp areas and the Mobility Hub are accounted for in the transportation analysis. Refer to Topical Response No. 10, Trip Generation, for a more detailed explanation of the derivation of the trip generation estimates for the Project, including Section D, Basecamp, for a discussion of basecamp trips.

As discussed in Response to Comment No. 26-160, the Mobility Hub would not be a source of net new trips because it would generate fewer new trips than it displaces. The Mobility Hub would reduce single-occupant vehicle trips to and from the Project Site and thus reduce both vehicle trips and VMT. Therefore, the air quality, GHG, and noise analyses in the Draft EIR are conservative because they are based on the higher number of trips and VMT that do not measure the overall positive effects of the Mobility Hub.

As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, the EIR accounts for the potential physical environmental impacts of all proposed uses and activities, regardless of whether they are within the definition of floor area.

As discussed in Response to Comment No. 26-E.1-28, within the Draft EIR, electricity and GHG emissions associated with lighting of basecamp areas and the Mobility

Hub were accounted for in the GHG emissions and energy calculations associated with covered parking areas. However, as part of this Final EIR, these components were separately evaluated within the confirmatory air quality, GHG, and energy analyses included as Appendix FEIR-9. As shown in these confirmatory analyses, impacts would remain less than significant.

Also note that no portable generators would be used for basecamp and Mobility Hub operations, and electrical hookups would be provided for trailers to minimize use of combustion powered equipment.

Comment No. 26-36

DEIR Ignores Portable Generators Spread Across the Project Site

According to the Project Description, power generators would be used to supply power to the basecamps. But the DEIR fails to indicate whether these portable generators would run on diesel fuel or some other fuel, such as compressed natural gas (CNG).

If they combust diesel fuel, then they will emit DPM and other TACs, apparently without any restrictions on location, hours of use, or duration of use.

Furthermore, it appears that large areas of basecamps and other production areas are to be located below grade and in parking structures and it's unclear how diesel trucks and generator emissions will be controlled. The DEIR must calculate the emissions associated with these generators (and diesel trucks) and model their health impacts on the sensitive receptors.

Similarly, fuel stations can be a source of TACs both on-site and offsite, including for sensitive receptors. The DEIR includes inadequate information on the locations and specifications (e.g., how many pumps) of these fuel stations.

Response to Comment No. 26-36

Power generators would not be used to supply power to the basecamps. While existing production activities occasionally require the use of small portable generators when electrical hookups are not available, the Project will provide a sufficient number of electrical hookups in basecamp areas such that use of portable generators will be prohibited. Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of additional electrical hookups at all basecamp areas. Diesel trucks accessing basecamps would travel on-site for short distances and would plug into electric power when parked. Diesel trucks would also comply with a CARB-mandated ATCM which limits idling to no more than five

minutes at a time. As discussed in Topical Response No. 10, Trip Generation, trip generation estimates in the Draft EIR included trips associated with basecamp operations.

Also note that, while outdoor production activities may occur above Project Grade, no active production activities or uses would be located in the basecamp or parking areas below Project Grade. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

A fueling station would not be permitted under the proposed Specific Plan. Accordingly, the fueling station use has been removed from Section II, Project Description, of the Draft EIR. The removal of fueling operations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-37

Failure to Assess Applicability of SCAQMD Warehouse Indirect Source Rule

On May 7, 2021, the SCAQMD Governing Board adopted Rule 2305, known as the Warehouse Indirect Source Rule (ISR). The rule requires warehouses greater than 100,000 square feet to directly reduce nitrogen oxide (NOx) and DPM emissions, or to otherwise reduce emissions and exposure of these pollutants in nearby communities.

Warehouses are a key destination for heavy-duty trucks and have other sources of emissions like cargo handling equipment, all of which contribute to local pollution, including toxic emissions, to the communities that live near them. Among the Project permitted uses is warehouses. No further information is provided regarding the warehouses. How much warehousing would be permitted? What size of warehouse? How many? As indicated by the very existence of the ISR, warehouses on the Project Site could attract large numbers of trucks on an ongoing basis that would further burden local air quality with DPM and other TACs, as well as regional air quality with NOx emissions.

While the DEIR mentions the ISR (Rule 2305), it fails to analyze the applicability of the ISR to the on-site warehouses. The DEIR must disclose the square footage of warehouses on the Project Site, assess applicability of Rule 2305, and notify the public of the Project's compliance plan.

Response to Comment No. 26-37

The commenter discusses Rule 2305, which applies to warehouse facilities with warehouse buildings greater than or equal to 100,000 square feet and defines a warehouse as a building which stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers. The Project does not include the defined

warehouse uses, and such warehouse uses would not be permitted under the proposed Specific Plan. Accordingly, the warehouse use has been removed from Section II, Project Description, of the Draft EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Thus, Rule 2305 does not apply to the Project. As stated on page II-16 in Section II, Project Description, of the Draft EIR, the Project includes five uses—sound stage, production support, production office, general office, and retail uses. See Topical Response No. 3, Permitted On-Site Uses, for additional detail on the permitted on-site land uses.

Comment No. 26-38

Inconsistency with South Coast Air Quality Management District Rules

Additionally, Rule 1166 lays out certain requirements for disturbed and excavated soils that may contain petroleum hydrocarbons. Petroleum hydrocarbons (e.g., tar or oil) are present at the Project Site. Rule 1166 requires submission of an excavation plan application. Additionally, excavation operations need to be monitored for VOC concentrations and the excavation plan must include a discussion of how the Project will handle VOC-contaminated soil. How will the Project comply with SCAQMD Rule 1166? Given the sensitive uses immediately adjacent to the Project Site (residences, schools, park) additional information is required to assess the potential emission of hazardous substances, such as petroleum, hydrogen sulfide and VOCs during soil disturbance and other construction activities.

The Project Site has naturally-occurring methane that will create a safety problem for the underground facilities that would be allowed by the DEIR. This methane can build up and risk explosions. The DEIR refers to methane venting systems but does not refer to SCAQMD Rule 219. How will the Project comply with SCAQMD Rule 219? That rule includes an exemption for certain residential methane venting systems, but if a system vents H₂S or other TAC emissions to atmosphere, a District permit may be required and District Rule 1401's health risk limits might be triggered. The DEIR must perform the necessary analysis to determine whether compliance with SCAQMD Rule 2019 or Rule 1401 is required, how compliance will be achieved, and the potential impacts associated with compliance.

Response to Comment No. 26-38

As discussed on page IV.F-43 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, in the event that VOC-impacted soils are encountered during construction or construction occurs in areas of known or potential contamination, appropriate handling, off-site disposal, and/or treatment would be implemented in accordance with the Soil Management Plan (included as Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]) and applicable regulatory requirements, including SCAQMD Rule 1166

(Volatile Organic Compound Emissions from Decontamination of Soil). Pursuant to Mitigation Measure HAZ-MM-1 (see pages IV.F-50 to IV.F-53 of the Draft EIR) and the Soil Management Plan, in the event VOC-contaminated soil is encountered during excavation, a SCAQMD Rule 1166 permit must be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than 3 inches from the surface of the excavated soil with an organic vapor analyzer (OVA) calibrated with an appropriate calibration solution, such as hexane or isobutylene. Based on available subsurface soil, soil vapor and groundwater testing data, conditions that might exceed the 50 ppm VOC level would not be commonly encountered at the Project Site, but excavation at the residual gasoline plume in soil and groundwater (northeast corner of the Project Site) may create limited conditions above the 50-ppm level due to gasoline range organics (GRO) and benzene, toluene, ethylbenzene, and total xylenes (BTEX).

Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, is applicable to excavation and grading of soil containing VOC materials. As discussed on pages 16–17 of the Soil Management Plan and set forth in Mitigation Measure HAZ-MM-1, either a Various Locations permit and plan, or a site-specific permit and plan will be required for excavation, depending upon the volume of soil to be excavated per Rule 1166. Undisturbed soil is not included in the scope and jurisdiction of Rule 1166. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit will be the responsibility of the General Contractor. Requirements under Rule 1166 are briefly summarized below. The list below is a general, not comprehensive, list of Rule 1166 requirements for VOC-contaminated soil handling, stockpiling, and off-site disposal. In addition, Rule 1166 requirements vary depending upon concentrations of VOC encountered.

- If a Rule 1166 permit is required, an air monitoring plan may be required by the SCAQMD. Air monitoring plans are intended to protect the surrounding community from harmful exposure to VOCs from the Project Site and typically entail stationary monitoring stations for sample collection for laboratory analysis. Protection of on-site construction workers shall be accomplished by development and implementation of a Health and Safety Plan.
- VOC-contaminated soil is determined at the time of excavation by measurement of VOCs emitted from the soil cut face with a photoionization detector (PID), equipped with a 10.6 electron volt (eV) lamp, calibrated with hexane or isobutylene. The ambient air in all areas of soil impact (e.g., excavation) will be measured and recorded every 15 minutes.
- Stockpiles are required to be managed in accordance with specific criteria stipulated in Rule 1166 and the Rule 1166 permit. At a minimum, stockpiles of VOC contaminated soil must be segregated from non-VOC-contaminated soil.

Water suppressant and/or plastic sheet covering with sand-bag anchors may be required for VOC-contaminated soil stockpiles.

- No on-site or off-site spreading, grading, or screening of excavated VOC contaminated soil is permitted.
- VOC-contaminated soil must either be shipped off-site for appropriate disposal or on-site treatment must be initiated within 30 days of excavation. If total VOCs are 1,000 ppm or greater (by PID), then the soil must be placed into sealed containers or directly loaded into haul trucks moistened with water, covered, and immediately transported off-site the same day to an appropriate disposal facility.

As discussed in Response to Comment Nos. 13-4 and 16-28, with regard to potential soil contamination, any residual concentrations would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1. Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control. For example, as stated in Mitigation Measure HAZ-MM-1, if the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the property owner's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by the property owner prior to the beginning of work. The Suspect Soil must be managed and handled in accordance with Sections 5.3.1 to 5.3.3 of the Soil Management Plan.

Odors potentially produced by excavation activities, such as from hydrogen sulfide, will be monitored and controlled pursuant to SCAQMD Rule 402, Nuisance [SCAQMD, 1976] and an odor monitoring plan. With respect to methane gas control, refer to Response to Comment No. 13-6. As stated therein, the installation of a methane mitigation system will address potential vapor intrusion from residual fuel hydrocarbons from the former Texaco station, and naturally occurring hydrogen sulfide.

With respect to SCAQMD Rule 219, Equipment not Requiring a Written Permit Pursuant to Regulation II, this rule applies to passive and intermittently operated active venting systems used at and around residential structures to prevent the accumulation of naturally occurring methane and associated gases in enclosed spaces, which is not applicable to the Project because the Project does not include residential structures. Therefore, a permit exception in accordance with SCAQMD Rule 219 is not required. As discussed in Response to Comment No. 13-6, the Project's methane mitigation system will be reviewed and approved by LADBS and will ensure a less-than-significant impact.

SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants, this rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I of Rule 1401, which does not include methane.

Note that the SCAQMD provides guidance for compliance with Rule 1401, and the quantitative HRA prepared for the Project in response to comments on the Draft EIR (refer to Appendix FEIR-10 of this Final EIR) is consistent with this guidance. In addition, any permitted sources on-site would also be required to obtain a SCAQMD Permit, consistent with Rule 1401.

Comment No. 26-39

The DEIR's Mitigation Proposals Are Inadequate

CEQA requires the City to implement all feasible mitigation measures that would reduce the Project's significant impacts. The DEIR's proposed mitigation measures are insufficient to mitigate the identified and unidentified significant impacts. Therefore, the City must adopt further, feasible measures as described more fully below.

The Project's construction air quality impacts would remain significant and unavoidable after mitigation. In addition, the Project's concurrent construction and operational emissions under the long-term buildout scenario would remain significant and unavoidable after mitigation. To minimize these impacts as required by CEQA, the DEIR should consider the feasibility of the following mitigation measures for the Project and apply all feasible measures:

- Use of exclusively electric-powered construction equipment where such models are available.
- Use of zero emission or near-zero emission (ZE and NZE, respectively) heavy-duty trucks and other equipment during construction. Use of these trucks would further reduce NOx emissions.
- Use of ZE and NZE vendors and delivery trucks during operation, particularly for the warehouse operations given the JSR discussed herein.
- Installation of not only light-duty EV charging stations, but also charging stations for medium- and heavy-duty EVs.
- A prohibition on use of diesel and CNG portable generators, at basecamps or elsewhere on-site. Installation of a backbone electrical grid so that plugs are available at all potential basecamp sites.

Response to Comment No. 26-39

The commenter summarizes a series of proposed mitigation measures intended to address the Project's significant and unavoidable air quality impacts. Please note that the commenter's consultant (Comment Letter No. 26-E.1) recommended these measures as mitigation for GHG impacts, not air quality (see Comment No. 26-E.1-38), and there is no technical basis for applying these measures to air quality.

The similar mitigation measures are discussed in greater detail in responses to the following comments:

- Use of electric-powered (ZE and NZE) construction equipment: Response to Comment Nos. 1-2 and 26-40;
- ZE and NZE operational trucks: Response to Comment No. 26-E.1-38; and
- Medium- and heavy-duty EV charging stations: Response to Comment No. 26-E.1-38

With respect to construction ZE and NZE construction trucks, ZE and NZE truck use will occur in the future and it is not within the Project's operational influence to ensure that only ZE or NZE vehicles operate at the Project Site during construction. During construction, numerous independent contractors will operate haul trucks and delivery trucks, who may themselves subcontract other entities, including small businesses, to provide hauling and deliveries to meet those needs. There is simply no feasible mechanism to fairly apply and enforce such a requirement given the scale of Project construction. Development of commercial ZE and NZE technologies is ongoing and further development is necessary to meet the requirements of CARB's adopted Advanced Clean Trucks program, in-development Advanced Clean Fleets program, and any other future ZE and NZE vehicle programs or policies. Moreover, the needs of commercial ZE and NZE vehicles have changed dramatically over the past decade, and, as the adoption of ZE and NZE trucks increases and new ZE and NZE vehicles technologies emerge, the needs will continue to evolve. As discussed on page IV.A-44 in Section IV.A, Air Quality, and on page IV.E-48 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, mobile source emissions were estimated using emission rates from the current version of CalEEMod, which do not account for the use of ZE and NZE trucks and do not account for improvements to fuel economy or emissions standards beyond 2026. Therefore, Project mobile source emissions conservatively overestimate emissions for this source. The truck trips estimated for the Project in the Draft EIR represent the reasonably foreseeable trips which could be associated with Project construction. Due to the conservative vehicle emissions estimates in the Draft EIR, actual future construction mobile source emissions are expected to be lower than those presented in the Draft EIR.

With respect to the commenter's suggestion to prohibit the use of portable generators at basecamps, Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of additional electrical hookups at all basecamp areas to eliminate the need for portable generators.

Comment No. 26-40

The following mitigation measures which appear to be feasible for the Project also should be imposed:

Construction Mitigation Measures
In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during Project construction be battery-powered. The use of battery operated equipment will reduce emissions associated with diesel/gasoline powered equipment.
In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard. This goes beyond the proposed measure of requiring 2010 model year or newer and would provide additional reductions beyond those identified in the DEIR.
Require all construction vehicles to be rinsed prior to exiting the construction site. This will reduce fugitive dust emissions associated with the Project.
Use cement blended with the maximum feasible amount of flash or other materials that reduce emissions from cement production.
Use lighter-colored pavement where feasible. This Will prevent heat islands which can increase air pollution.
All exposed surfaces shall be watered with non-potable water at a frequency adequate to maintain minimum soil moisture of 12%. Moisture content can be verified by lab samples or moisture probe.
All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. This will prevent fugitive dust from spreading into the nearby sensitive receptor areas.

Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50% air porosity. This will prevent fugitive dust from spreading into the nearby sensitive receptor areas,

The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be prohibited. Activities shall be phased to reduce the extent of disturbed surfaces at any one time.

Use low-VOC coatings beyond the local requirements.

Require that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM.

Operation Mitigation Measures

Provide off-site safety or other improvements for bicycles, pedestrians, and transit connections beyond the referenced cross-walk improvements.

Given the Specific Plan nature of the Project and its long-term buildout, require the Project to report energy use, and set specific targets for reductions in energy use over time.

Provide a micromobility charging hub, such as a Perch portal (<https://www.perchmobility.com/>) to be used by employees and visitors.

Response to Comment No. 26-40

The commenter recommends a variety of emissions mitigation measures for consideration. Please note that the commenter's consultant (Comment Letter No. 26-E.1) recommended these measures as mitigation for GHG, not air quality (see Comment No. 26-E.1-39), and there is no technical basis for applying these measures to air quality.

As discussed on pages IV.A-62, IV.A-65, and IV.A-76 in Section IV.A, Air Quality, of the Draft EIR, the Project would result in significant regional construction emissions of NO_x, significant localized construction emissions of PM₁₀ and PM_{2.5}, significant regional combined construction and operational emissions of VOC under the long-term buildout scenario, and less than significant regional and localized operational emissions. As discussed on page IV.E-83 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would be consistent with applicable plans, policies, and regulations pursuant to GHG emissions and, thus, no mitigation is required. The Draft EIR details various PDFs and mitigation measures included in the Project for the minimization of air quality and GHG emissions. All recommended measures have been considered, compared to existing PDFs

and mitigation measures and, if not already present in the document, analyzed for applicability and feasibility as follows to reduce air quality impacts.

The commenter suggests that small (less than 19 kilowatt) off-road construction equipment be electrically powered. Per the commenter's suggestion, Mitigation Measure AIR-MM-1 has been revised as presented in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and now additionally requires, to the extent commercially available, the use of electric small (less than 19 kilowatt) off-road construction equipment.

The commenter suggests a mitigation measure requiring the use of model year 2014 or newer heavy-duty trucks meeting CARB's low-NO_x standard during construction. Per the commenter's suggestion, Mitigation Measure AIR-MM-2 has been revised as presented in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and now additionally requires, to the extent commercially available, the use of model year 2014 or newer heavy-duty trucks meeting CARB's 2013 optional low-NO_x standard.

The commenter suggests that construction vehicles be rinsed prior to exiting the construction site. As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of best available control technologies (BACT) for dust control, including measures for the prevention of dust track-out onto public roads. As such, a specific measure to rinse vehicles prior to exiting the construction site is not necessary as compliance with SCAQMD Rule 403 requires BACT measures to be included. The commenter suggests that cement be blended with the maximum feasible amount of flash or other emission-reducing products. Incorporation of high levels of flash (i.e., fly ash or coal ash) can reduce GHG emissions associated with concrete production (which occurs off-site) by reducing CO₂ emissions through mineral carbonation. However, as discussed above, the Project would result in a less-than-significant GHG impact. Thus, no mitigation is required. This comment has not provided substantial evidence of how the use of flash in concrete would reduce significant Project-related air quality impacts. Furthermore, flash contains hazardous contaminants, including mercury, cadmium, and arsenic, which could negatively impact communities in the vicinity of the Project Site if carried off-site by local winds. Based on the above information, this measure does not need to be considered further in this Final EIR. The commenter suggests that lighter-colored pavement be used to reduce heat island effects; however, this measure is already addressed through Project Design Feature GHG-PDF-1, which mandates that the Project be designed to meet the equivalent of LEED Gold or higher sustainability standards. These standards require design elements, such as those suggested by the commenter, to reduce the heat island effects of the Project. However, as discussed above, the Project would result in less-than-significant GHG impacts. Thus, no mitigation is required. Furthermore, this comment has not provided substantial evidence of how this measure would reduce significant Project-related air quality impacts.

The commenter suggests a variety of mitigation recommendations related to the control of fugitive dust, including watering of disturbed areas, suspension of construction activities during periods of high wind, use of wind breaks at the boundaries of construction activities, and phasing of construction activities. As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACTs for dust control, which includes mandatory control actions and dust control contingency measures incorporating each of the commenter's suggested measures as appropriate and applicable to control fugitive dust.

The commenter suggests that low-VOC emission coatings be used beyond local requirements. As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 1113—Architectural Coatings limits the allowable VOC content of architectural coatings in the SCAQMD's jurisdiction and is regularly amended to reduce allowable VOC content of architectural coatings based on the commercial availability of low-VOC products. This rule was most recently amended in 2015, limiting building envelope coatings to low-VOC content levels (50 grams per liter) beginning in 2019. Construction and subsequent operation of the Project will be consistent with Rule 1113 requirements as even lower-VOC products are made more commercially available and the rule continues to be updated.

The commenter suggests that BACT be employed for construction equipment PM and NO_x emissions. The suggested measure is already addressed through Mitigation Measure AIR-MM-1, which requires the use of Tier 4 Final emission standard equipment. As discussed in Response to Comment No. 1-2, Mitigation Measure AIR-MM-1 has been revised as presented in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and now additionally requires equipment to meet future CARB Tier 5 emission standards if commercially available.

The commenter suggests a mitigation measure pertaining to off-site safety or other improvements for bicycles, pedestrians, and transit connections. As described on pages II-21, II-23, and II-25 in Section II, Project Description, of the Draft EIR, the Project would include an array of frontage and public realm improvements to enhance pedestrian, bicycle, and bus access. Refer also to Response to Comment Nos. 16-72 and 26-E.4-3. Additionally, consistent with Project Design Feature TR-PDF-2, the Project will implement a series of TDM measures that exceed the requirements established in the current TDM Ordinance and support pedestrian safety and additional bike lanes.

Regarding the recommendation to report energy use and set specific targets for reductions in energy use over time, please refer to pages IV.C-41 and IV.C-43 in Section IV.C, Energy, of the Draft EIR, as neither construction nor subsequent operation of the Project would result in significant impacts with respect to energy; thus, the suggested

measure, which would not directly reduce energy consumption, is not necessary or required under CEQA.

Regarding the recommendation to include a micromobility charging hub, please refer to page IV.E-51 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, in which the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces must include EV charging equipment, and a total of 30 percent of all new parking spaces would be required to be EV "ready," which must be capable of supporting future EV charging equipment. This requirement would effectively implement the recommended measure.

Comment No. 26-41

B. Cultural Resources and Tribal Cultural Resources

The DEIR's sections on Cultural Resources and Tribal Cultural Resources are fundamentally incomplete and inadequate. See attached **Exhibit 2, Letter Report on the Review of the Draft Environmental Impact Report and Supporting Technical Appendices for the TVC 2050 Project** from Statistical Research, Inc. (SRI Report). The DEIR's Cultural Resources and Tribal Cultural Resources sections must be revised and recirculated for further public review and comment.

The DEIR Defines the Period of Significance Too Narrowly

The DEIR claims that the Project's period of significance only extends from 1952 to 1963. As discussed in the SRI Report, the period of significance for the CBS television studio on the Project Site is the span of time when the property actively contributed to the growth and popularity of commercial television, which ended no earlier than 1979.

By improperly limiting the period of significance, the DEIR conveniently excludes the 1969 Mill Addition and the 1976 Support Building from the period of significance and avoids addressing the impacts of the proposed demolition of these likely historic resources. The 1969 Mill Addition and 1976 Support Building were part of the original Television City master plan. Gin Wong, a master architect who coordinated the architectural design and construction of the Primary Studio Complex for Pereira and Luckman, also designed these additions. The Project's Cultural Resource analysis must be redone with an appropriate period of significance, the 1969 Mill Addition and 1976 Support Building must be reevaluated under the more appropriate period of significance of 1952–1979, and the DEIR must be recirculated.

Response to Comment No. 26-41

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the period of significance was not established by the Draft EIR, but by the adopted HCM designation, which identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation.

The commenter provides no explanation as to how the period of significance was determined improperly. Furthermore, in preparing the Historic Report (Appendix C.1 of the Draft EIR), HRG reviewed all of the relevant materials for consistency with best practices and concluded the period of significance was appropriate. The period of significance ends in 1963 because that is the year CBS ended its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City.

The commenter provides no justification for extending the period of significance to 1979. The commenter incorrectly states that the 1969 Mill Addition and 1976 Support Building “must” be considered historical resources because they were designed by Gin Wong. For the record, the 1969 Mill Addition was designed by Pereira and Luckman, while Wong was the project coordinator. The 1976 Support Building and 1992 East Studio Building were designed by Gin Wong Associates. Although designed by a notable architect, neither the Support Building nor the East Studio Building are of particular merit individually.

A celebrated architect in his own right, Wong’s indispensable contributions to the design and construction of Television City is thoroughly acknowledged in the HCM nomination. NPS guidance, however, states that not every property designed by a master architect is necessarily significant. To be eligible, the property “must express a particular phase in the development of the master’s career, an aspect of his or her work, or a particular idea or theme in his or her work.”⁴³ The improvements at Television City directly credited to Wong do not represent an architectural achievement and did not play an important role in Wong’s career. Therefore, the 1976 Support Building addition and 1992 East Studio Building are not eligible as historical resources in and of themselves or character-defining features of Television City because they were designed by Wong.

Overall, the analysis of historical resources was completed in full compliance with CEQA. This comment does not provide substantial evidence that “significant new

⁴³ Patrick Andrus and Rebecca Shrimpton, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), 20.

information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-42

The Cultural Resources Surveys Are Incomplete

The DEIR fails to include an archaeologic resources report. The DEIR merely relies on information from the Tribal Cultural Resources report, which does not include consideration of archaeological resources from the protohistoric and historical periods and fails to adequately investigate specific types of buried cultural resources with a high likelihood of being present at the Project Site. Why did the City not require a detailed review of cultural resources given the clear evidence that such resources are likely present at the Project Site?

Given the known archaeological resources in the Project area, the Project should follow standard methodology for the evaluation of archaeological resources, including a geoarchaeological study. As detailed in the SRI Report, the level of archaeological resource analysis conducted for the Project, especially in light of the known resources in the area, failed to meet the minimum standards for CEQA review.

Instead, the DEIR surprisingly focuses on prehistoric period information from San Diego and the Mojave Desert instead of the Los Angeles Basin. Why focus on San Diego and the Mojave Desert? The limited Los Angeles Basin information relies on cultural resource surveys that were performed over a decade ago, with the last investigation performed in 2012, and ignores recent research in downtown Los Angeles and the coastal communities. Why was more recent research information excluded?

The DEIR omits historical archaeology, which includes known buried historical period resources on the Project Site and immediate vicinity, such as those relating to the Mexican Rancho Period and the Rancho La Brea, the Gilmore Adobe, the local oil industry, and development of early sports and entertainment businesses, including Gilmore Field and Gilmore Stadium. Why was this rich history ignored? This information is important to anticipating the potential buried resources that can exist in the Project area.

The Tribal Cultural Resources Report is also inadequate because: (1) there was no pedestrian survey completed; (2) the records search area of a ½-mile radius should be increased to 10 miles to capture relevant sites; and (3) the Tribal Cultural Resources Report incorrectly focuses on the wrong regions (e.g., San Diego and Mojave Desert). Further, the DEIR states that copies of four studies within the Project Site were not obtained due to COVID-19 operation protocols. How did the protocols affect the City’s

ability to get copies of the reports? What efforts has the City recently taken to get copies of the reports? Does the City know the results of the reports?

Response to Comment No. 26-42

Regarding the standards for a CEQA review, the need for additional technical analysis considers whether information on the existing conditions is already available and whether substantial evidence has already been identified, such that the agency can make a decision regarding the potential for impacts and evaluate the adequacy of proposed measures to mitigate potentially significant impacts. As explained below, the analysis of the Project's potential impact to archaeological resources in the Draft EIR, including the various technical reports included as appendices to the Draft EIR, satisfies that standard under CEQA. Multiple sources presented in the Draft EIR provide substantial information on the historical setting and existing conditions for the Project Site as they relate to the assessment of archaeological resources. The available information includes the following: results from searches of the California Historical Resources Information System (CHRIS) and Sacred Lands File (SLF); discussion of historical land uses supported by archival photographs, maps, permits, and other published sources; photographs from recent site visits depicting the Project site and surroundings; and geotechnical data. This information was included in the following sources: pages IV.B-16 through IV.B-16, IV.B-57 and IV.B-58 in Section IV.B, Cultural Resources, of the Draft EIR; pages IV.D-11, IV.D-15, and IV.D-16 in Section IV.D, Geology and Soils, of the Draft EIR; pages IV.L-5 through IV.L-13 in the Section IV.L, Tribal Cultural Resources, of the Draft EIR; the Historic Report in Appendix C.1 of the Draft EIR; a historical resources report prepared by Architectural Resources Group (ARG) for the assessment of CBS Television City, which is included as Appendix C to the Historic Report; the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR; the Preliminary Geotechnical Engineering Investigation in Appendix E.1 of the Draft EIR; and the Phase I Environmental Site Assessment in Appendix G of the Draft EIR.

There is a detailed discussion of the historical background and context for the Project Site in pages 24–28 and 39–44 in the historic resources report by ARG, pages 13–54 in the Historic Report, and pages 20–22 in the Tribal Cultural Resources Report. Relevant portions of are excerpted or summarized in Section IV.B, Cultural Resources, of the Draft EIR. A review of Gabrielino ethnographic literature is included in pages 15–20 and 32–41 in the Tribal Cultural Resources Report. Additional historical sources were included in the review of maps and aerial photographs that are discussed on pages 28–29 of the Tribal Cultural Resources Report. These sections include a discussion of the Spanish and Mexican historical periods; the developments made by the Gilmore family, including the operation of the dairy and their ventures in the oil, sports, and entertainment industry; and the development of the CBS Studios.

The discussion of the CHRIS records search results and on-site soils is especially relevant to analysis of archaeological resources. The CHRIS results are initially referenced on pages IV.B-33 and IV.B-34 of Section IV.B, Cultural Resources, of the Draft EIR, and then repeated on page IV.B-57, and discussed on page 28 of the Tribal Cultural Resources Report. The discussion of on-site soils is included in Section IV.D, Geology and Soils, of the Draft EIR, and the Preliminary Geotechnical Engineering Investigation included in Appendix E.1 of the Draft EIR. The results of the geotechnical investigation were also reviewed and addressed on pages 29–30 in the Tribal Cultural Resources Report. The CHRIS search results identified two historical archaeological sites: CA-LAN-3045H and CA-LAN-2964H. CA-LAN-3045H was identified during construction of The Grove at Farmers Market commercial development. Additional information on these two resources were obtained from studies obtained in the CHRIS search, particularly two reports discussing the archaeological monitoring work conducted in the early 2000s by Cogstone Resource Management Inc. (Cogstone) for The Grove at Farmers Market project: *Archaeological and Paleontological Monitoring Report for Phase I of The Grove at Farmers Market (CA-LAN-3045H), Los Angeles, Los Angeles County, California*; *Final Archaeological and Paleontological Monitoring Report for The Grove at Farmers Market, The Farmers Market Expansion Project, and the Gilmore Adobe Landscaping Project, Los Angeles, Los Angeles County, California*. These reports were both submitted in 2003 and provided additional information on the archaeological components of CA-LAN-3045H and summarized the results of a records search conducted at the time.

The components of CA-LAN-3045H, which include the Gilmore Adobe itself, were composed entirely of historic-period materials (from the nineteenth and twentieth century). While some of the specific components recorded in CA-LAN-3045H are not necessarily also likely to occur within the Project Site (e.g., features from The Original Farmers Market and early 1900s oil extraction), the historical themes and material components referenced in the summary of CA-LAN-3045H constitute a substantial element of the historical context and existing conditions for the Project Site, and thereby provide a reasonable basis on which to analyze the potential for impacts. CA-LAN-2964H was composed of assorted historical refuse found as a diffuse scatter and one brick-lined structure, which mostly date between 1930 and 1950, although a few items date as early as 1901 to 1911. The components were identified during construction monitoring for a mixed-use development and were recorded in two discontinuous parcels situated between the Park La Brea apartments and 3rd Street, west of Cochran Avenue and east of Ogden Drive, between 280 and 990 meters (919 to 3,248 feet) south-southwest of the Project Site. The type and age of materials from CA-LAN-2964H are already represented by the archaeological components in CA-LAN-3045H, which otherwise provides more representative example of the type of archaeological resources likely to be encountered in the Project Site; therefore, detailed analysis or discussion of CA-LAN-2964H is unnecessary and does not contribute any substantially new information on the existing conditions or potential for impacts. The relevance of CA-LAN-2964H in the assessment of the CHRIS records search results is

further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR.

The proximity of CA-LAN-3045H to the Project Site is noted on page IV.B-58 of Section IV.B, Cultural Resources, of the Draft EIR, which recognizes that there is some potential for unknown historic-period materials in the Project Site, adequately considers the type of archaeological resource most likely to be encountered, and provides a reasonable means of mitigating potentially significant impacts if such a resource is identified. Thus, the information already obtained and presented in the above-references sources provided sufficient evidence to reasonably conclude that the Project Site has the potential to contain previously unidentified archaeological resources, particularly materials associated with the historical land uses during the late nineteenth and twentieth centuries.

Regarding the need for a pedestrian survey, the lack of exposed ground surfaces and the availability of information on the existing conditions for the Project Site eliminates the need for a pedestrian survey to adequately assess archaeological resources. Ground photographs taken of the Project Site and surrounding area were provided in Appendix A of the Historic Report, which was included in Appendix C.1 of the Draft EIR. Another set of ground photographs taken of the Project Site and surroundings were provided in Attachment B of the Phase I Environmental Site Assessment, which was included as part of Appendix G in the Draft EIR. Analysis of the recent ground photographs combined with recent aerial imagery made it clear that existing unpaved surfaces on the Project Site were confined to landscaping whose inspection through further pedestrian survey has no obvious utility in an archaeological assessment. While on some occasions it may be helpful to include a pedestrian survey for a mostly paved setting, it is common for an archaeological assessment to exclude this for urban settings. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion regarding standard archaeological practices and methodological considerations given in assessing the need for pedestrian survey.

Regarding the need for a geoarchaeological analysis, this portion of comment is referring to an analysis that considers archaeological evidence in relationship to geological and environmental data such as sediment type (also referred to as soil), stratigraphy, geomorphology, and topographic setting. Archaeological evidence includes information from previously recorded artifacts and sites, consideration of Native American foraging behaviors and patterns, and historical land uses. A geoarchaeological study may be conducted to answer several different types of research topics, but the most pertinent application in an environmental review under CEQA is assessing the potential for a buried resource within a given project site. Analyzing the potential for a buried resource is also referred to as preservation potential, sensitivity analysis, sensitivity assessment, or buried site assessment. From a regulatory perspective, there are no standard terms and defined methods specific to conducting a geoarchaeological study or analysis of buried site

potential. Rather, this is assessed under CEQA as part of the existing environmental conditions. As discussed above, the presence of CA-LAN-3045H provided sufficient evidence to suggest that archaeological materials similar in nature could occur within the Project Site, as was disclosed on pages IV.B-57 and IV.B-58 in Section IV.B, Cultural Resources, of the Draft EIR. The presence of CA-LAN-3045H and multiple sources discussing the historical background and on-site soils provided the relevant information to support this finding. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, further reinforces the findings of the impact analysis presented in the Draft EIR, Tribal Cultural Resources Report, historical resources report, geotechnical investigation, and Phase I Environmental Site Assessment.

The additional detail presented in the Supplemental Cultural Memo includes information on the internal components of CA-LAN-3045H, and expands the discussion of the geotechnical results, historical land uses, and sensitivity for historical archaeological resources. The Supplemental Cultural Memo also further integrates the archaeological data with the discussion of the geotechnical data otherwise presented in Section IV.D, Geology and Soils, of the Draft EIR, Preliminary Geotechnical Engineering Investigation in Appendix E.1 of the Draft EIR, and the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The need for additional archaeological testing—including but not limited to methods using mechanical excavation and remote sensing—as part of an expanded geoarchaeological assessment was further assessed and confirmed as being unnecessary to support the findings already presented in the Draft EIR, which considers the substantial evidence already provided concerning the likelihood of discovering an archaeological resource and the proposed means of mitigating the potential for impacts. Given the availability of the existing information from multiple data sources, additional sampling is unlikely to contribute any significant information that would materially change the analysis of impacts and recommended mitigation measure provided in the Draft EIR. As stated in the Supplemental Cultural Memo, additional review did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR or considered in the Tribal Cultural Resources Report.

Regarding the adequacy of the CHRIS records search area, a radius of 0.5 mile around the Project Site was used to identify previously recorded cultural and tribal cultural resources, and reports prepared for study areas that have been mapped within the specified radius around the Project area. This radius is among the three most commonly used by technical experts for assessing archaeological and tribal cultural resources. Neither the CHRIS search nor the radius used for the search are specifically cited in existing regulations, but the search itself is nonetheless conducted as a matter of due diligence and is cited as such in most guidance documents and recommendations. In all cases, the project scale and nature of the existing knowledge are considered when assessing the radius and whether the results returned are adequate for characterizing the existing conditions. CHRIS records search radii of 0.25, 0.5, and 1.0 mile are the standard

increments used for technical studies conducted in the City of Los Angeles. The smaller radius is often conducted in areas that have more resources recorded nearby, whereas a 1.0-mile radius might be used when there are fewer. A search radius of 10 miles is disproportionate to the Project's potential impact(s) to archaeological or tribal cultural resources, in addition to being unnecessary, given available information.

The CHRIS records search presented in the Draft EIR was conducted using a 0.5-mile radius and identified the two historical archaeological sites mentioned above: CA-LAN-2964H and CA-LAN-3045H. The information contained in the archaeological site records and associated reports obtained at the time, as summarized in the Draft EIR and technical studies, were detailed enough to provide a reasonable characterization of the existing conditions for the Project Site, and further reinforces that the CHRIS records search was more than adequate for purposes of assessing archaeological resources for the Project Site.

The Supplemental Cultural memo, included in Appendix FEIR-14 of this Final EIR, provides further details regarding the selection of a radius distance when conducting a CHRIS records search and gives expert opinion confirming that the use of a 0.5-mile radius for the Project provided adequate information to characterize the existing conditions within the Project Site.

Regarding the copies of reports that were not available at the time of the CHRIS records search, of the 37 reports identified in the CHRIS records search, copies of four studies (LA-01939, LA-04558, LA-06442, and LA-11473) were not provided. The staff at the South Central Coastal Information Center (SCCIC) stated that the reports were not already digitized and their staff could not access the paper records because of COVID-19 restrictions in place at the time, as stated in the Draft EIR and Tribal Cultural Resources Report. These access constraints applied to any party who requested the CHRIS records search, including public agencies. Even without the copies of the report being available at the time, the information obtained from the CHRIS records search—bibliographic information of all studies, site records, and full-length copies of other studies—provided a reasonable indication that the reports were unlikely to provide substantially new information beyond what was already available.

Of the four studies for which only bibliographic references were available, LA-04558 and LA-11473 did not explicitly address archaeological or tribal cultural resources because they were conducted for projects that did not involve ground disturbances, and instead were focused on assessing above-grade historic resources. For the other two reports that were not available (LA-01939 and LA-06442), both had been previously reviewed or

otherwise referenced in the aforementioned studies by Cogstone. LA-06442 is a report prepared by Greenwood and Associates in 2002 titled *The Grove at Farmers Market, Phase I, Archaeological Monitoring*.⁴⁴ The report presents the results from an earlier phase of work for the same project (The Grove at Farmers Market) reported by Cogstone. Report LA-01939 contains an excerpt from a draft EIR prepared in the late-1980s for the Grove at Farmers Market Project (State Clearinghouse No. 1987102102). To clearly demonstrate that the analysis did not exclude any substantial information presented in these reports, copies of the four studies were obtained while preparing the Supplemental Cultural Memo. The Greenwood and Associates report (LA-06442) included some more detailed information on the archaeological components of CA-LAN-3045H, but their work preceded that of Cogstone who had largely accounted for the prior work at the site and offered a more recent update to the site. The other three reports were confirmed as having no information relevant to a review of archaeological or tribal cultural resources. Assessment of these reports confirmed the prior assessment that none of the information presented in these four reports altered the conclusions of the original findings or omitted meaningful information not otherwise presented in the Draft EIR or technical studies. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further detail on the contents of these specific reports and gives expert opinion confirming the conclusions of the findings presented in the Section IV.B, Cultural Resources, of the Draft EIR.

Regarding the regional prehistoric context referenced in the Tribal Cultural Resources Report, page 13 of the report states that, “[v]arious attempts to parse out variability in prehistoric archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these chronologies are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions.” There is no single “correct” chronology and California archaeologists have developed multiple chronologies based on new information and in service of different research objectives. For example, in their synthesis of the Native American archaeological record in Southern California, Brian Byrd and Mark Raab⁴⁵ use a chronology based on a region defined as the Southern Bight of California—the coast and near-coastal setting covering the area between Point Conception, California, and northern Baja. The Tribal Cultural Resources Report draws on broader regional patterns that are documented through review of early prehistory to supplement information gaps local to the Project Site. The summary of the prehistoric context presented in the Draft EIR was put

⁴⁴ Messick, Pete, Alice Hale, Roberta S. Greenwood, *The Grove at Farmers Market, Phase I, Archaeological Monitoring*, 2002 (Greenwood and Associates, Pacific Palisades). On file, South Central Coastal Information Center, California State University, Fullerton, California.

⁴⁵ Byrd, Brian F. and Mark Raab, “Prehistory of the Southern Bight: Models for a New Millennium” (*California Prehistory: Colonization, Culture, and Complexity*, Terry L. Jones and Kathryn A. Klar, eds., 2007, pp. 215–228. AltaMira Press, Lanham, Maryland).

forward as a good faith effort to publicly disclose that the Native American archaeological record within southern California begins thousands of years ago, and has been subdivided various ways by scholars to characterize various changes that are represented across this timespan. In this regard, by giving a basic summary of Native American history for the region, both the Archaeological Resources and Tribal Cultural Resources sections of the Draft EIR provide an adequate means of characterizing the existing conditions, which was used to inform the impact analysis. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further details on some of the alternative chronological sequences used in academic literature and provides confirmation on the adequacy of the typology used in the Tribal Cultural Resources Report.

Comment No. 26-43

The Project Design Features (“PDF”) Are Disguised Mitigation Measures

CUL-PDF-1 and CUL-PDF-2 are mitigation measures disguised as a “Project Design Feature.” By assuming implementation of the PDFs, the DEIR fails to disclose the Project’s actual environmental impacts. The DEIR must analyze potential impacts first and then propose all feasible mitigation measures. The Courts have been clear that projects cannot disguise their actual impacts in this manner. (See *Lotus v. Department of Transportation*, 223 Cal.App.4th 645.) Therefore, the Cultural Resource analysis must be redone without assuming the PDFs would be in place. This is especially true because there is no Project even proposed—just a Specific Plan that allegedly sets forth guidelines for development which are not available for public review.

The PDFs Improperly Defer Mitigation

CUL-PDF-2 constitutes deferred analysis. This work is critical to understanding what the impacts will be, and it should have been performed prior to the DEIR’s release. As explained in the SRI Report, without a Historic Structure Report (HSR) prepared now, the public and decision-makers cannot understand how the proposed rehabilitation of the Primary Studio Complex would impact the historical resource. A detailed HSR should be required as part of the DEIR, particularly because there is no defined development plan for the Project. Without an HSR, the DEIR’s analysis and conclusions regarding the Project’s potential impacts on historical resources is unsupported. Why did the DEIR not include this necessary analysis? The public and decision-makers are denied the opportunity to evaluate the feasibility of implementing this massive Project without significantly impacting on-site cultural resources until it is too late. The DEIR should be recirculated with this new information.

Response to Comment No. 26-43

The comment that Project Design Features CUL-PDF-1 and CUL-PDF-2 are disguised as mitigation measures is incorrect. These PDFs are included as an integral part of the design of the Project (i.e., they are part of the Project that is analyzed by the Draft EIR). By definition, mitigation measures are not part of the original project design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are above and beyond existing laws, regulations, and requirements that would reduce environmental impacts.

As discussed throughout Section IV.B, Cultural Resources, of the Draft EIR, Project Design Feature CUL-PDF-1 establishes Project Parameters to ensure that the rehabilitation of the Primary Studio Complex preserves its historic significance and integrity and maximizes the retention of its historic fabric and character-defining features. In part, these Project Parameters set forth the removal of non-historic additions and the retention of character-defining features to ensure that the Primary Studio Complex is not adversely impacted. These Project Parameters form the basis for the Conceptual Site Plan analyzed in the Historic Report. In addition, as discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Project would also include an HSR to guide the rehabilitation of the Primary Studio Complex in accordance with the Rehabilitation Standards. OHR would use the HSR in reviewing Project plans and approving permits pursuant to the requirements of the Cultural Heritage Ordinance. Accordingly, the PDFs are described, and their effectiveness in reducing or avoiding potential impacts are analyzed in the Draft EIR, consistent with CEQA and *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 (per *Lotus*, concluding that an impact is less than significant without describing how avoidance and minimization measures of the project design prevent or minimize the impact, is not legally adequate). Further, the PDFs are included in the Mitigation Monitoring Program; refer to Section IV, Mitigation Monitoring Program, of this Final EIR. Therefore, the commenter's statement that the cultural resource analysis must be redone without assuming the PDFs would be in place is incorrect and contrary to CEQA and the case cited in their comment.

Regarding the comment that there is no project, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR provides all of the necessary information to provide a thorough analysis of the Project's potential impacts in accordance with CEQA. As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are

substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance. Refer also to Section B of Topical Response No. 5 regarding Project Design Feature CUL-PDF-2 and the implementation timing of the HSR.

Refer to Response to Comment Nos. 5-14, 11-3, and 26-7 for further discussion on the scale of the Project. In addition, with regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-44

The Mitigation Measures Are Inadequate

Based on the DEIR’s failure to assess potential impacts to buried archaeological resources, CUL-MM-1 regarding archaeological monitoring during Project grading is inadequate. On-site monitoring may be appropriate to identify and treat unanticipated resources, but it is inadequate where there is a very high likelihood for buried resources to be present. Given the information regarding the Project Site, it is anticipated such resources will be encountered. As such, an archaeological testing plan should be developed for any major ground disturbance activities in order to fully avoid or mitigate the Project’s potential impacts.

Response to Comment No. 26-44

Regarding the assessment of the likelihood for buried resources, see Response to Comment No. 26-42 for the discussion of the process for characterizing the existing conditions and identifying the potential for buried archaeological resources, especially those similar in nature to those recorded for CA-LAN-3045H. Mitigation Measure CUL-MM-1, as stated in the Section IV.B, Cultural Resources, of the Draft EIR, includes specific provisions to ensure that any archaeological discoveries are evaluated and treated in accordance with applicable regulations and following professional standards. The measure specifically refers to “unanticipated” archaeological resources, also referenced as “unknown resources,” but neither of these phrasings negate the statements in the impact analysis recognizing that there is a potential for historical archaeological resources to occur, as suggested by the presence of an archaeological site CA-LAN-3045H. For the

Project Site as a whole, it is reasonable to conclude that there may be archaeological materials identified in specific locations that cannot be anticipated, even if there is an overall understanding of the most likely resources likely to occur and a general sense of where they may or may not be located. Conversely, areas designated as having a higher likelihood of containing archaeological resources are anticipated to have areas without any archaeological materials, even though one area may have a higher likelihood compared to another.

The phrasing of “unanticipated” or “unknown” resources is intended to acknowledge that archaeological materials could be present but have as-yet not been confirmed archaeologically. Response to Comment No. 26-42 addresses why archaeological testing to confirm the presence or absence across the Project Site is impractical and unnecessary, which is firstly because the evidence needed to provide a reasonable characterization of the existing conditions within the Project site had already been identified, and secondly because the same result could be achieved through implementation of the steps proposed in Mitigation Measure CUL-MM-1. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further clarification regarding the potential for buried resource within the Project Site.

By identifying the qualification standards for retaining a qualified archaeologist, specifying the criteria by which the CRMTP shall be prepared, requiring a worker training program, and identifying the timing necessary for each of these steps, implementation of Mitigation Measure CUL-MM-1 provides a reasonable means by which trained specialists would identify any archaeological resources that may be present, evaluate them as a historical resource and unique archaeological resource, and proceed in implementing mitigative treatment measures that would avoid or allow for the recovery of scientifically consequential information, or take other potential actions that could be appropriate based on the specific type of resource identified. When carried out, these steps can reasonably be expected to allow for any archaeological resources that may be present to be confirmed, evaluated, and if necessary, treated when avoidance is not feasible. In so doing, the provisions put forward in Mitigation Measure CUL-MM-1 provide an adequate means of reducing potentially significant impacts to less than significant levels.

Also, as shown in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR, Mitigation Measure CUL-MM-1 has been clarified to further define performance criteria and enhance the ability of the principal archaeologist (now referred to as the Qualified Archaeologist) and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

The activities of the Qualified Archaeologist and archaeological monitors working under their direction are now supplemented by a Tribal Consultant and Native American

monitor. These roles have been identified to ensure that in the event of an archaeological resource that is Native American in origin is discovered, then tribal values would be appropriately considered in addition to scientific values during evaluation and treatment. By providing a second individual to observe ground-disturbing activities, the Native American monitor further enhances the ability of the archaeological monitor to ensure that any potential archaeological resources that may be present are identified.

Revisions to Mitigation Measure CUL-MM-1 have been made to provide greater clarity and consistency in the terminology used to describe the roles of various qualified personnel. For example, the “qualified principal archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology” is now defined as the Qualified Archaeologist.

Revisions to Mitigation Measure CUL-MM-1 have been made to clarify and enhance the CRMTP. The provision in Mitigation Measure CUL-MM-1 requiring the CRMTP include “applicable regulations” has been revised to include specific regulations, including but not limited to the requirement that preservation in place be the preferred alternative for treatment. The revised measure has removed the provision requiring that the archaeological monitor be approved by the City’s Office of Historic Resources (OHR) because Mitigation Measure CUL-MM-1 already requires the CRMTP to include qualifications standards for a monitor and that the CRMTP be approved by City Planning, which includes the OHR.

The revised mitigation measure also includes a minimal radius of 25 feet as an area in which Ground Disturbing work must cease in the event an archaeological resource is discovered. Details related to the curation of archaeological materials have also been added in the revision to Mitigation Measure CUL-MM-1 that further clarify the treatment procedures defined in the CRMTP.

Mitigation Measure CUL-MM-1, as revised, has removed the reference to “native soils” as a condition for monitoring ground-disturbing activities. Mitigation Measure CUL-MM-1 has also been revised to clarify that the monitoring will occur during demolition and construction activities and continue until the “...Qualified Archaeologist and Tribal Consultant, in consultation with the archaeological monitor and Native American Monitor, determines monitoring is no longer necessary.”⁴⁶ Reporting requirements have been

⁴⁶ “Tribal Consultant” refers to a representative of a California Native American Tribe. “Native American monitor” refers to any person authorized by the Tribal Consultant to act as a monitor, regardless may of their status as a member of a California Native American Tribe. The difference in the terms “Tribal” and “Native American” in these respective roles conveys that the monitor may have a different tribal affiliation from person(s) acting as the Tribal Consultant.

added to further clarify the means by which the SOI *Standards for Archeological Documentation* will be implemented. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR for this revised mitigation measure.

Archaeological documentation and treatment provisions may include but are not limited to the collection and curation of artifacts as part of a larger data recovery program, which is typically the most appropriate means of mitigating archaeological losses resulting from construction. Identification of an appropriate repository for the curation of any collected materials is a standard component of a treatment plan and would be identified during preparation of the CRMTP as specified in Mitigation Measure CUL-MM-1. At a minimum, public benefit is conferred through archaeological data recovery by recovering the scientifically relevant information through recording, collection and analysis of artifacts, making the results available in a report, and retaining a curated sample of artifacts at repository for future research, which are all standard components of treatment for archaeological resources, especially those that are historic-in-age. The need for a public education component or artifact exhibition would require considering the basis on which the significance of the resource has been established and several other factors that could only be determined once a resource was identified. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further clarification and expert opinion regarding how the preparation and implementation of the CRMTP in accordance with the SOI Documentation Standards provides adequate protection for significant archaeological resources and defines a process for determining when it is appropriate to collect, analyze, curate, and exhibit any archaeological materials that could be identified during the Project.

Thus, curating and exhibiting collected items from an archaeological resource as a means of treatment is not imposed as a condition in the Mitigation Measure CUL-MM-1 but is also not specifically ruled out from consideration as a means of implementing the measure. Minor revisions have been made to Mitigation Measure CUL-MM-1 that otherwise maintains the same overall framework described in the Draft EIR to further ensure that implementation would avoid or reduce potentially significant impacts to archaeological resources encountered during the Project.

Comment No. 26-45

Project Parameters Are Purely Conceptual

The Historic Report underlying the DEIR's analysis analyzed a purely conceptual design that the applicant is not required to implement and limited and inappropriate "Project Parameters" (CULPDF1). Because the Project design is merely conceptual and no Specific Plan is provided, it is impossible to know the Specific Plan's actual impacts. The public needs to be able to review the Specific Plan and other Project documents, such as the Sign District and HSR to understand what they allow in order to assess the Project's

Cultural Resources impacts. The Project Parameters do not aid in this evaluation as they are vague or themselves result in significant impacts as discussed in more detail in the SRI Report. In the absence of definitive development plans, based on the Project's proposed Height Zones, new construction would envelop the Primary Studio Complex and result in a significant loss of integrity with respect to setting, feeling, and association. Height Zone A (Figure II-5), which is supposedly a "viewshed restoration" area, would permit buildings up to 58 feet in height. How can historic views from Beverly Boulevard be preserved with one or more six-story buildings allowed directly north of the Primary Studio Complex? The Primary Studio complex could then be surrounded on the remaining sides by Height Zone D that permits buildings up to 225-feet in height. And development would be permitted on top of the Primary Studio Complex as well. Height Zone E would permit a rooftop addition up to 36 feet above the existing parapet of the Studio Building for a length of approximately 350 feet. In addition, Height Zone F is a rooftop zone that would apparently permit a variety of non-occupiable structures on top of the Primary Studio Complex north of Height Zone E. So the Primary Studio Complex would be surrounded and overshadowed by new development, diminishing its integrity.

Response to Comment No. 26-45

Refer to Topical Response No. 5, Historical Resources, specifically Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, regarding the HSR and preservation of the Primary Studio Complex and regulatory procedures; Section C, Potential New Construction North of the Primary Studio Complex, regarding potential new construction north of the Primary Studio Complex (i.e., Height Zone A, the Viewshed Restoration Area); and Section D, Analysis of Impacts to the Primary Studio Complex, regarding impacts to the Primary Studio Complex, including an analysis of the rooftop addition. Also refer to Response to Comment No. 26-E.2-6 regarding the proposed buildings to the east and west of the Primary Studio Complex within Height Zone D and how the distinctive form and design of the Primary Studio Complex would remain intact, and its architectural features would remain visible with implementation of the Project.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR discloses all of the elements of the Project required by CEQA and provides a comprehensive analysis of the proposed development program. A draft Specific Plan and Preliminary Draft Specific Plan are not required by CEQA for environmental analysis of the Project. Please note that the Preliminary Draft Specific Plan incorporates the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review.

As discussed throughout Section IV.B, Cultural Resources, of the Draft EIR, Project Design Feature CUL-PDF-1 establishes Project Parameters to ensure that the rehabilitation of the Primary Studio Complex preserves its historic integrity and maximizes the retention of its character-defining features. The assertion that the Project Parameters would themselves result in significant impacts seems to be based upon the false belief that the 1969 Mill Addition and 1976 Support Building are character-defining features of the Primary Studio Complex. As discussed in Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-41, the 1969 Mill Addition and 1976 Support Building were not included in the HCM Findings or designation. The report referred to by the commenter does not provide any “details” about the 1969 Mill Addition and 1976 Support Building. It just states that these buildings are “likely” significant without providing any evidence. As discussed on pages 51 to 54 of the Historic Report, removing these non-historic additions would not adversely impact the Primary Studio Complex, but rather reveal extant historic fabric to be rehabilitated. Additionally, as discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the preparation of an HSR will complement the City’s regulations aimed at protecting and managing the historical resource. The claim that an HSR is required to properly analyze potential impacts to the Primary Studio Complex is incorrect as neither the State of California nor the City of Los Angeles requires an HSR as baseline information for the CEQA review of historical resources.

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the regulations and procedures for new construction in the Viewshed Restoration Area and restoration of the historic viewshed along Beverly Boulevard; see also Response to Comment No. 26-19. The statement that six-story buildings would be allowed in the Viewshed Restoration Area is incorrect. As discussed in Section C of the topical response, the 58-foot height limit in

the Viewshed Restoration Area, which is approximately two-thirds of the 88-foot height of the existing Primary Studio Complex, is taken directly from the HCM Findings. In addition to the 58-foot height limit, any development in the Viewshed Restoration Area would be required by the HCM Findings, which would be codified in the proposed Specific Plan, to restore the currently obstructed character-defining viewshed features of the Primary Studio Complex as seen from adjacent public areas along Beverly Boulevard. Further, as proposed in the Preliminary Draft Specific Plan, development in the Viewshed Restoration Area greater than one story in height would require a Project Compliance approval pursuant to LAMC Section 11.5.7[13B.4.2], which is a discretionary approval that would require CEQA compliance review.

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Draft EIR and Historic Report included a full analysis of integrity after implementation of the Project. This analysis concluded that integrity of *association* would be retained but the integrity of *feeling* for the Primary Studio Complex would be adversely affected. In addition, the integrity of *setting* has already been lost prior to this Project. As explained in the Historic Report, NPS guidance states, “to retain historic integrity a property would always possess several, and usually most of the (seven) aspects” of integrity.⁴⁷ The integrity analysis included in the Draft EIR and Historic Report found that after the Project is constructed, the Primary Studio Complex would retain most of the aspects of integrity, including *location*, *design*, *materials*, *workmanship*, and *association*. Retaining five out of seven of the aspects of integrity—one of which was already compromised prior to the Project—would qualify as retaining “most.”

With regard to the “non-occupiable structures” allowed in Height Zone F, such structures refer to housing for mechanical services or communication equipment which are common on building rooftops. These types of structures have always occupied portions of the Primary Studio Complex roof and are necessary for maintaining building operations. Non-occupiable rooftop structures do not add to the height and mass of the building overall in any substantial way.

Comment No. 26-46

Destruction of the South Façade

The Project proposes to demolish the South Façade of the Service Building. This level of alteration would destroy the entire building’s integrity. There is no evidence in the DEIR supporting a contrary conclusion. The DEIR claims that the demolition of the 1976 Support

⁴⁷ Refer to the Historical Resources Technical Report included as Appendix C.1 of the Draft EIR, Section 9.7.

building would restore the Studio Building to its original form and volume. However, as discussed in the SRI Report, the 1976 Support Building is likely a historical resource. Therefore, the Cultural Resource analysis must be redone to identify these impacts.

Response to Comment No. 26-46

The commenter is correct that the south façade of the Service Building would be removed; however, the commenter offers no evidence or analysis as to why this might “destroy the entire building’s integrity.” Contrary to the assertions of the commenter, the comprehensive analysis provided in Section IV.B, Cultural Resources, of the Draft EIR does support the conclusion that the Primary Studio Complex would retain sufficient integrity to maintain its historic significance (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-41 to IV.B-55 and Appendix C.1, Historic Report, pages 50 to 64). The Draft EIR correctly concluded that the Project would not result in a substantial adverse change in the significance of the Primary Studio Complex, and impacts would be less than significant. This is due to the fact that removal would be limited to the rear portion of the original Service Building which retains few character-defining features and is not generally visible to the public. More importantly, the analysis accounts for the retention and rehabilitation of the entire Primary Studio Complex, which includes both the Service Building and the attached Studio Building. Although the two original component parts of the Primary Studio Complex are referred to as the “Studio Building” and “Service Building” to reflect programmatic distinctions, they were, in fact, designed together as an integrated and functionally dependent complex. Since its original construction, portions of the Primary Studio Complex have been altered through removal and additions. As discussed on page IV.B-42 of the Draft EIR, demolition of the south portion of the Service Building would remove some original material and alter the building’s overall form and volume. This loss of material, however, would be counterbalanced by the removal of the 1976 Support Building, which would restore the original form and volume of the Studio Building and restore and reveal its original west wall. Because the majority of the original volume of the Studio Building would be restored, the overall form and volume of the original Primary Studio Complex would be improved as compared to existing conditions. Moreover, compliance with the Rehabilitation Standards is based upon the totality of a project and whether a project preserves the historic character of the subject building as a whole. This Project is not limited to removing the rear portion of the original Service Building. Despite some loss of integrity by removing the southern portion of the Service Building, on balance, the integrity of the Primary Studio Complex would be improved overall. For more information regarding the preservation of the Primary Studio Complex, refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources. Refer to Response to Comment No. 26-E.2-5 regarding impacts to the Service Building.

The claims that the 1976 Support Building is likely a historical resource and the cultural resource analysis must be redone are incorrect. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the HCM Findings identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the 1976 Support Building and any other buildings and structures constructed after 1963 were not included in the designation.

Comment No. 26-47

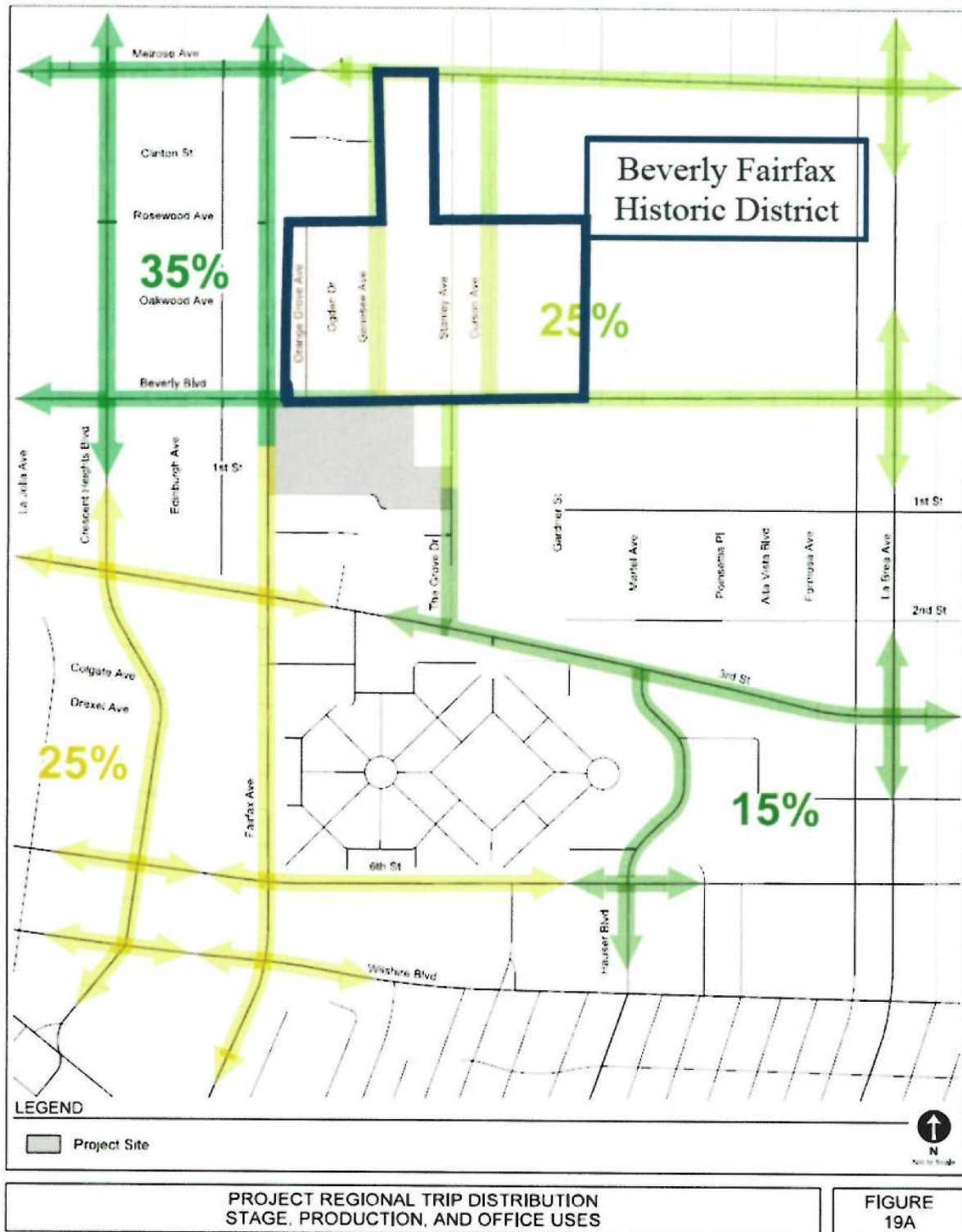
Identified Historical Resources

In addition, the DEIR describes “numerous historical-period resources [that] were identified during the records search,” but it only focuses on one (P-19-003045/CA-LAN-003045H). Why does the DEIR only focus on the one? What about the other “numerous” historical-period resources that were identified? The DEIR needs to describe and analyze those resources too.

The DEIR Gives Short Shrift to the Gilmore Adobe, Farmer’s Market and Beverly Fairfax Historic District

The DEIR inappropriately dismisses potential impacts to the Gilmore Adobe and the Farmer’s Market. The overall setting will markedly change following Project implementation, with the proposed height and massing of buildings immediately adjacent to the Gilmore Adobe and the Farmer’s Market. Currently, the entire area is characterized by low-rise structures whereas the Project proposes development of structures that could reach 225 feet (up to 20 stories), significantly diminishing the environmental setting and affecting the view sheds of the Gilmore Adobe and Farmer’s Market. A more detailed assessment of potential impacts to both of these historic resources is required.

The DEIR and Historic Report also fail to adequately assess the potential impacts to other surrounding resources, including the Beverly Fairfax Historic District (listed in the NRHP in 2018). Anticipated cut-through traffic in the neighborhood from the Project which is documented in the Transportation Assessment for the Project, is an unstudied impact on the historic district. As noted in the SRI Report, increased traffic through the historic district would diminish the integrity of the Beverly Fairfax Historic District. A comparison of the map of the district and the map of the traffic intrusion for the Project transportation study shows the direct impact on this district. The DEIR must be revised to include this information and recirculated.



Response to Comment No. 26-47

Regarding the focus on CA-LAN-3045H⁴⁸ of the likelihood for buried resources, see Response to Comment No. 26-42 for a discussion on the relevance of the site to the characterization of existing conditions and how this informed the analysis of the potential for impacts. In brief, the material contents of CA-LAN-3045H, its location and associated historical land uses, and the circumstances of its discovery during construction monitoring provided important information regarding the existing conditions within the current Project Site. Combining the documentary evidence from CA-LAN-3045H with the other sources of data, including but not limited to the other results from the CHRIS records search, the available information provided sufficient evidence to analyze the potential for impacts to archaeological and tribal cultural resources, and formulate reasonable and feasible means of mitigation. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further analysis of how the information from CA-LAN-3045H was used in this regard.

The reference to “numerous historical-period resources” is cited on page IV.B-34 of Section IV.B, Cultural Resources, of the Draft EIR, which provides a review of the CHRIS records search results based on the contents in the Tribal Cultural Resource Report in Appendix C.2 of the Draft EIR. The section discussing previously recorded resources that were identified in the CHRIS records search is given on page 27 of the Tribal Cultural Resource Report. There is a summary table that lists two previously recorded archaeological sites, both composed of materials from the eighteenth and nineteenth centuries, i.e., the historic period.⁴⁹ The two sites are CA-LAN-2964H and CA-LAN-3045H. A description of CA-LAN-2964H is provided in the table and the site is noted as being approximately 915 feet away from the Project Site. The location of CA-LAN-2964H plotted on a scaled map that is part of the confidential appendix, which also includes the site forms that contain further confidential information on the detailed contents and location of the site. Compared with CA-LAN-3045H, the contents of CA-LAN-2964H were redundant and did not contribute any substantially new information otherwise obtained from the analysis of CA-LAN-3045H. Given that CA-LAN-3045H provided adequate and more precise information on the existing conditions with the Project Site, partly by virtue of being located in closer proximity, further description of CA-LAN-2964H was excluded from the summary of CHRIS results in Section IV.B, Cultural Resources, of the Draft EIR.

⁴⁸ The commenter uses a combination of CHRIS database identifiers P-19-003045/CA-LAN-003045H that is simplified to the trinomial site number used here.

⁴⁹ As discussed on pages IV.B-33 and IV.B-34 of the Draft EIR, “...the CHRIS records search indicate that there are eight cultural resources mapped by the SCCIC within the 0.5-mile records-search radius. Of these, six are historic built environment resources and two are historic-period archaeological sites.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 5-13 regarding impacts to historical resources in the vicinity of the Project Site. As discussed therein, the Draft EIR fully and adequately analyzed potential impacts to historical resources in the vicinity of the Project Site, including the Gilmore Adobe and The Original Farmers Market, in Section IV.B, Cultural Resources, and Appendix C.1 (Historic Report) of the Draft EIR. The Gilmore Adobe and The Original Farmers Market are discussed on pages IV.B-27 to IV.B-29 of the Draft EIR and pages 39 to 40 of the Historic Report, and potential impacts to these historical resources are discussed on page IV.B-55 of the Draft EIR and pages 87–88 of the Historic Report.

The immediate setting of these two historical resources would be unaffected by the Project because it would not involve the demolition, destruction, relocation, or alteration of either of these historical resources. The broad setting of the Gilmore Adobe and The Original Farmers Market has been continually altered by adjacent construction, demolition, and new construction since they were originally built, including construction of The Grove shopping and entertainment center in 2002, which shares a property line with the aforementioned resource. Therefore, neither The Original Farmers Market nor the Gilmore Adobe currently retains their integrity of broad setting. The commenter does not explain how or why the broad setting, which has already been substantially changed, is essential to conveying the significance of these historical resources. Visibility of a new building constructed as a result of the Project from a historical resource in the vicinity alone would not result in a significant impact. For a significant impact to occur under CEQA, the integrity of the historical resource would have to be diminished to the degree that it would no longer be able to convey its significance. The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the historical resources in the vicinity, including their integrity of setting, and concluded that any potential impacts would be less than significant.

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, historical impacts and transportation impacts are analyzed separately and have different thresholds. No explanation is provided as to how increased trips through the Beverly Fairfax Historic District might translate to physical demolition, destruction, relocation, or alteration such that the significance of the Beverly Fairfax Historic District would be materially impaired, which is the threshold for significant impacts on historical resources in Appendix G of the CEQA Guidelines.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-48**Cumulative Impacts**

In addition, the DEIR identifies only 3 related projects in the Project vicinity, assuming a buildout year of 2026. The DEIR must consider a longer build-out year—up to 2043—given the proposed build out until 2043. The DEIR must analyze reasonably foreseeable projects based on that longer build out.

Nature of Use

The Project proposes 1.4 million square feet of office space and only 350,000 square feet of sound stages and 104,000 of production support. Thus, in terms of use, this is an office project. The change in use from studio to office was not considered as part of the historic assessment. Shouldn't that change of use be evaluated in the historic assessment? The DEIR must be revised to include this analysis and recirculated.

Response to Comment No. 26-48

The cumulative impact analyses in the Draft EIR include development of all known related projects in the Project Site vicinity based on information provided by LADOT and the Department of City Planning. As shown in Section III, Environmental Setting, of the Draft EIR, this list includes 68 related projects, not three related projects as stated by the commenter. In addition, this list of related projects is not limited to projects with a buildout year of 2026. For the purpose of assessing cumulative impacts on historical resources, the analysis focused on the three related projects located in the Project Site vicinity. Only these three have the potential to contribute to alterations to identified historical resources on the Project Site and in the Project Site vicinity. Thus, the Draft EIR fully evaluates cumulative impacts based on a list of reasonably foreseeable projects. The Draft EIR also includes a specific discussion of a long-term buildout scenario for each of the impact analyses.

The comment incorrectly claims that the Project is an office project and is a change in use. As stated repeatedly throughout the Draft EIR, the Project is a studio project that would continue the existing studio use. The proposed Specific Plan would allow five land uses—sound stage, production support, production office, general office, and retail (these are the same uses as the existing studio, except the Project would include a small amount of neighborhood-serving retail). Further, the proposed Specific Plan would limit general office and production office floor area to a maximum of 700,000 square feet each. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. The rise of digital media has created the need for larger and taller sound stage volumes as well as enhanced technological infrastructure and production office, and the studio ecosystem requires offices to be located close to sound stages and production support. The industry

has changed and become more digitized which requires much more office space co-located on a campus setting than traditional studios. The proposed development program analyzed in the Draft EIR provides an adequate and complementary mix of uses, including 350,000 square feet of sound stage, 104,000 square feet of production support, 700,000 square feet of production office, 700,000 square feet of general office, and 20,000 square feet of retail uses. Regardless of how the property would be used in the future, a change of use does not, in and of itself, constitute a significant impact to a historical resource under CEQA. A project has the potential to result in a significant impact only if a new use will cause a substantial physical change such that the historical resource can no longer convey its historic significance. The Draft EIR and Historic Report included a full analysis of the integrity of the Primary Studio Complex after implementation of the Project (refer to Draft EIR pages IV.B-54 to IV.B-55 and Historic Report pages 76 to 81), and found that the Primary Studio Complex would retain sufficient integrity after implementation of the Project to convey its historic significance. Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for more information regarding the preservation of the Primary Studio Complex.

As discussed in Topical Response No. 1, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-49

Tribal Consultation

The City’s tribal consultation does not appear to comply with SB 18. It also appears that the City did not meet the good faith effort standards for AB 52. The City sent one letter to the tribal representative on the City’s contact list near the height of the COVID-19 pandemic. It appears that the City’s tribal consultation letters did not require a signature for delivery, so it is possible that letters were not actually delivered or were delivered to unoccupied offices given the ongoing pandemic. There is nothing in the record that indicates the recipients actually received the letters. There is also nothing that indicates

that the City followed up with any phone calls or other letters, even when the City did not receive any responses. As a result, particularly in light of the pandemic and potential that letters were not received, the City's efforts fall short of the good faith effort required by law.

Response to Comment No. 26-49

Refer to Response to Comment No. 26-E.2-17 with regard to SB 18 and the adequacy of the City's tribal consultation efforts in accordance with AB 52.

Comment No. 26-50

C. Energy

The State is facing a future where impacts to the energy system will become even more critical as we transition away from fossil fuels and rely on renewables. This necessary transition can be undermined by the Project's failure to adequately analyze impacts related to energy use. The DEIR's analysis related to energy is wholly inadequate and must be revised and recirculated.

DEIR Undercounts Energy Use by Failing to Include Basecamps, Production Areas, and Mobility Hub in Analysis

The DEIR does not appear to evaluate energy use from uses within the basecamps, production zones and Mobility Hub in its analysis. The DEIR admits that hundreds of thousands of square feet will be used for basecamp and production purposes but does not include these areas as floor area for the Project. Significant below grade areas and parking areas clearly are to be used for basecamps and production areas. Basecamps and production areas, which support production efforts, will use electricity. Therefore, such electricity use must be included in the DEIR's analysis of energy consumption. Similarly, the Mobility Hub will require electricity for support functions and yet the DEIR did not disclose how much electricity will be used by it. This information needs to be added into the analysis and the DEIR recirculated for public review.

The DEIR's analysis of water usage includes both basecamps' and Mobility Hub's usage, although it is not clear if the water usage factors accounted for the additional areas in the BI level and parking garage that will be used for production areas and basecamps. Please explain why the Draft EIR excludes these uses from its energy consumption analysis. Please provide a clear chart showing the energy assumptions for these uses. The DEIR must be revised to account for energy use from basecamps, production areas, and the Mobility Hub and recirculated for additional public comment.

There is a well-established correlation between fuel and electricity use and air quality emissions. The Project has numerous significant and unavoidable air quality impacts that require imposition of all feasible mitigation measures. There are a number of feasible, market-ready measures that the DEIR did not analyze or disclose to reduce electricity, natural gas, diesel fuel, and gasoline use. At a minimum, the City needs to analyze and disclose the energy use reductions that would be achieved by these measures. Please include this analysis in a recirculated DEIR for public comment.

Response to Comment No. 26-50

Refer to Response to Comment Nos. 26-E.1-27, 26-E.1-28, and 35-53 and Appendix FEIR-9 of this Final EIR for a detailed discussion regarding electricity usage associated with the basecamp areas, production areas, and the Mobility Hub, the CalEEMod land use modeling, and how the EIR analyzed the potential physical environmental impacts of all proposed uses, areas, and activities. Contrary to what is stated in this comment, electricity usage associated with basecamp, which are a subset of outdoor production areas, and the Mobility Hub was accounted for in the Draft EIR.

Per the comment's request, the electricity analysis is further detailed in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) to account more specifically for these uses, which confirms the conclusions in the Draft EIR for energy usage and GHG emissions. Regarding the correlation between fuel and electricity use and air quality emissions, Section IV.A, Air Quality, of the Draft EIR states that CalEEMod does not calculate criteria pollutant emissions from regional power plants associated with building electricity use (refer to pages IV.A-43 and IV.A-44). When electricity is used in buildings, the electricity generation typically takes place off-site at power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, State, and federal control measures, which can be considered the maximum feasible level of mitigation for stack emissions. This comment also refers to "a number of feasible, market-ready measures"; however, no specific measures were provided for consideration. The Draft EIR comprehensively analyzed the Project's energy impacts in Section IV.C, Energy, and concluded that impacts would be less than significant. Thus, no mitigation is required.

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and to Response to Comment Nos. 5-7 and 26-121 regarding the definition of floor area, how the Draft EIR does not underestimate the size of the Project, how all of the uses and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet

the definition of floor area, and how no active production activities would be located in the parking and basecamp areas below Project Grade.

This comment acknowledges that the Draft EIR's analysis of water usage includes both basecamp and Mobility Hub usage. Please note that Table IV.M.1-5 in Section IV.M.1, Utilities—Water Supply and Infrastructure, of the Draft EIR also provides water usage associated with covered parking (e.g., BI level and parking garage).

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-51

The DEIR Fails to Properly Analyze Natural Gas Usage Given the Long-term Buildout of Project

The DEIR's analysis of Threshold (b) in Energy Section (“Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?”) fails to analyze whether the Project conflicts with the State's goal of electrification of buildings in California. Why doesn't the DEIR address how the Project would be consistent with building electrification plans where the Project would include buildings that utilize natural gas for heating (e.g., space and water heating)?

Does the Project's use of natural gas conflict-with the State's SIP strategy and the 2022 AQMP for the SCAQMD? These strategies include control measures that require the use of zero-emission space and water heaters in new residential and commercial buildings-starting in 2030 (well before long-term build out date of 2043). Additionally, per the State's SIP strategy, the use of these fuels in buildings (primarily natural gas) for space and water heating can “contribute significantly to building related criteria pollutant and GHG emissions and provide an opportunity for substantial emissions reductions where zero-emission technology is available.”

For example, the State's SIP strategy includes a zero-emission standard for space and water heaters. Under this measure, CARB intends to develop a zero-emission standard using its regulatory authority for GHGs (which includes consideration of related criteria pollutant reduction benefits) for space and water heaters sold in California. This measure would go into effect in 2030 and require 100% of new space and water heaters (for either new construction or replacement of burned-out equipment in existing buildings) sold in California to meet the zero-emission standard. Does the Project) with a 2043 buildout, conflict with these standards?

Similarly, the SCAQMD's 2022 AQMP includes several building control measures intended to reduce emissions from water heating, space heating, cooking, and other combustion sources in both residential and commercial applications. In general, these control measures include the proposed development of rules to require installation of zero-emission equipment and appliances in both new and existing buildings. Does the Project, with a 2043 buildout, conflict with these measures?

The DEIR does not identify City policies on natural gas usage in new construction. Are there no such policies? Given the 2043 buildout the DEIR should-consider the relevant City energy policies.

As required by state law, both the CPUC (<https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division/building-decarbonization>) and the CEC (<https://www.energy.ca.gov/data-reports/reports/building-decarbonization-assessment>) have proceedings focused on transitioning buildings, including existing building stock, to be fully electric.

In light of these State and regional priorities and requirements, why doesn't the DEIR assess how a 2043 buildout of the Project including natural gas hookups would be consistent with the state's and region's various plans to electrify buildings?

Response to Comment No. 26-51

The Draft EIR analyzed the Project's energy impacts in Section IV.C, Energy, of the Draft EIR in accordance with CEQA and concluded that impacts would be less than significant. The Project's impacts related to conflicts with applicable plans for renewable energy or energy efficiency, including the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, the Green New Deal, and SCAG's 2020–2045 RTP/SCS, is analyzed on pages IV.C-41 to IV.C-43 of the Draft EIR. The Project's energy impacts under a long-term buildout scenario are analyzed on pages IV.C-43 to IV.C-44 of the Draft EIR.

The comments regarding the SIP strategy and the 2022 AQMP are similar to Comment No. 26-E.1-26. Refer to Response to Comment No. 26-E.1-26 for further discussion of this topic.

The Draft EIR analyzed all relevant and applicable City policies related to natural gas usage in new construction, as mentioned above. Based on the analysis presented in the Draft EIR, it was determined that the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. After the Draft EIR for the Project was publicly circulated, the City of Los Angeles passed Ordinance No. 187714 (effective January 2023), which requires all new buildings to be all-electric with a few exceptions. The City's all-electric buildings ordinance applies to any development where an application

for a building permit is submitted after April 1, 2023. As this all-electric buildings ordinance was not in effect at the time the Draft EIR was published, it was assumed that the Project would consume natural gas during operations. Although the all-electric buildings ordinance was not assumed in the GHG and energy demand modeling conducted for the Draft EIR, it would be expected that under the long-term buildout, at the milestone years indicated in the AQMP and SIP, construction approval would have required designs consistent with future applicable rules developed to implement AQMP and SIP control strategies for natural gas. As an example, Title 24 requirements apply to projects based on the date when a building permit is issued. Thus, buildings constructed at a later date would be required to comply with subsequent versions of Title 24, which typically include increasingly stringent energy conservation requirements and associated reductions in energy use. As the requirements under subsequent versions of Title 24 are not yet known, it would be speculative to include reductions in natural gas usage under a long-term buildout scenario and as such were not included in the calculation of natural gas usage.

Nonetheless, the Project would potentially be the first studio in the City built in accordance with the City's new all-electric buildings ordinance. Therefore, the GHG and energy analyses have been updated to take into account compliance with the City's new all-electric buildings ordinance. The updated Project modeling is included in Appendix FEIR-9 of this Final EIR, which confirms the less than significant conclusions of the Draft EIR. As detailed in the updated modeling, the building-related energy demand and GHG emissions included in the Draft EIR represented a conservative assessment of Project demands and emissions (i.e., the estimate of natural gas usage did not account for the City's new all-electric buildings ordinance that prohibits new natural gas usage with certain exceptions).

Please note that Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at all basecamp areas.

Comment No. 26-52

Failure to Assess Whether Electricity Distribution Infrastructure is Adequate to Handle the Project Site's Peak Load

Please explain why the DEIR failed to analyze whether the existing electricity distribution infrastructure can handle the Project's peak load. The DEIR only compares the Project's peak load to LADWP's total peak load across its service territory, which is not an informative or useful comparison as to impacts on utility infrastructure in the area. DWP often has localized infrastructure limitations and requires significant local projects to increase capacity. Has the City requested an assessment from DWP as to infrastructure needed to support the Project? Will the Project upgrades to local infrastructure require

additional offsite construction activities? Will the Project put area residents and businesses at risk for localized failures due to local infrastructure limitations? Why was this level of analysis not required?

With more uses being electrified (such as cars and trucks), the electricity grid is being strained at the local level. For examples, the Advanced Clean Trucks (ACT) regulation, adopted by CARB in 2020, covers everything from heavy-duty pickups or work trucks to the semi-trucks used in drayage and long-haul applications, and requires truck manufacturers, beginning with the 2024 model year (MY), to produce and sell ZEVs into California's market in growing numbers. The proposed ACF regulation would require certain fleets to deploy ZEVs starting in 2024 and would establish a clear end date of new medium- and heavy-duty internal combustion engine (ICE) vehicle sales in 2040. In its own CEQA-equivalent document prepared in support of the ACF regulation, CARB discloses the impact of electrified trucking on the grid:

- The electrification of the various sectors affected by the Proposed Program could increase local and regional energy use and impact supplies and requirements for additional capacity. The Proposed Program may also impact peak and base load period demands for electricity and other forms of energy. The level of energy demand generated from these actions, and the potential for a change in energy demand, would be site-specific and dependent on the location and scale that the electrification of these sectors would occur.
- CEC's preliminary modeling, which considered 5.0-kilowatt (kW) and 350-kW charging power levels, suggests that to charge these 180,000 medium- and heavy-duty BEVs, 157,000 DC fast chargers will be needed, of which 141,000 are 50 kW and 16,000 are 350 kW by 2030.
- This charging need will initially be focused "behind the fence" through depot charging, but publicly accessible options will be needed to enable a widespread charging network for long-range and interstate travels.
- CEC modeling indicates that the necessary make-ready infrastructure to support EVSEs requires special attention and investment.³

Given the level of truck usage anticipated for this Project, how did the DEIR consider these impacts of electrified trucking?

As described elsewhere herein, the Project may be required to fully electrify (i.e., no natural gas hookups), include plugs instead of portable diesel generators, and numerous charging stations to service, light-, medium-, and heavy-duty vehicles, plus micromobility options like e-bikes and e-scooters. This is especially true now that California has prohibited the sale of gas-powered vehicles starting in 2035, with significant reductions prior to 2035. A single heavy-duty charger can require 1 megawatt of capacity, over 16% of the Project's projected

peak load of 6,103 kw (which likely is an underestimate of the Project's actual peak load at buildout).

As has been well established by LADWP, SCE, PG&E, and SDG&E activity, the electrical distribution grid was not designed to handle these higher peak loads. Please provide a detailed analysis of the overall infrastructure needs to support the Project long-term, including consideration of the evolving electrification requirements.

Please assess whether the feeder lines (i.e., distribution lines) and substation currently serving the Project Site are adequate to address the peak load of a stable and finite Project design. This information should be included in a recirculated DEIR.

³ See <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/appd.pdf> (internal citations omitted).

Response to Comment No. 26-52

Exhibit 5 (LADWP Will Serve Letter) provided in Appendix O, Utility Infrastructure Technical Report, of the Draft EIR details that electric service is available and will be provided in accordance with the DWP Rules and Regulations. The estimated power requirement for the Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system. As discussed in Response to Comment No. 26-E.1-33, the energy demand analysis for existing conditions was conservatively based on CalEEMod historical default emission factors and resulted in reduced energy demand relative to the actual energy demands of the 50+ year old existing buildings at the Project Site. The updated energy usage estimated using CalEEMod 2022.1.1, which accounts for the City's Ordinance No. 187714 (effective January 2023), is presented in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) and shows, based on application of Ordinance No. 187714, that energy usage would be higher than the energy usage estimated for the Project in the Draft EIR. Thus, the City requested LADWP to provide an updated will-serve letter demonstrating that the Project's estimated electricity demand (including EV chargers and electrical hook-ups) could be met by the existing electrical infrastructure in the Project area. The updated LADWP will-serve letter is provided as part of the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) and confirms (a) that LADWP's infrastructure, including distribution grid, is sufficient to address the Project's electricity demands, and (b) the Project's less-than-significant electricity impact conclusion in the Draft EIR. Regarding the electrification of various sectors at the State level, it is not the responsibility of an individual project to evaluate or individually affirm the regional power grid's ability to meet the presumed power demands of CARB's current and future ZE and NZE program requirements. Given the Project's less-than-significant electricity impact, no

further analysis is required under CEQA. Refer to Response to Comment No. 26-E.1-38 for further discussion with respect to ZE and NZE infrastructure support.

As stated on page IV.E-51 of the Draft EIR, the Project would comply with the City's Green Building Ordinance regarding EV charging requirements. Additionally, a PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at basecamp areas during operations and this additional electricity usage is included in the Confirmatory Air Quality, GHG, and Energy Impacts Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR). Trucks accessing basecamps would travel on-site for short distances and would plug into electric power when parked in lieu of use of small portable generators (e.g., food trucks). The Draft EIR concluded that energy impacts associated with trucks would be less than significant and the Confirmatory Air Quality, GHG, and Energy Impacts Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR) confirmed that energy impacts associated with the additional electrical hookups for trucks/trailers at basecamp areas during operations would be less than significant; therefore, the Project does not require electrified trucking to reduce energy impacts.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-53

D. Geology, Soils, and Seismicity

The Geology and Soils section of the DEIR fails to provide important information to the public and decision-makers and includes conclusory statements of impact determinations, and proposes inadequate mitigation measures. Therefore, it must be revised and recirculated so the public and decision-makers can understand the Project's true impacts.

DEIR Fails to Analyze Dewatering Impacts

The DEIR fails to specify the extent of construction dewatering required.

Response to Comment No. 26-53

The dewatering analysis included in the Draft EIR is consistent with CEQA and City policy. Refer to Response to Comment No. 11-5 regarding the Draft EIR's analysis of impacts related to dewatering, which were determined to be less than significant. Refer to Response to Comment Nos. 11-25, 13-6, 16-64, 26-56 through 26-62, 26-64, 26-65, and

26-67 through 26-70 for further information regarding the temporary construction dewatering. A detailed technical dewatering analysis is typically performed during the individual building design and permitting phases after a project is approved, and not as part of an EIR. Nevertheless, in response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure (i.e., the Dewatering Report) is provided in Appendix FEIR-13 of this Final EIR for informational purposes. The Dewatering Report confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant.

In addition, as discussed in Response to Comment No. 3-7, per Project Design Feature GEO-PDF-1, the proposed below-grade parking structures will be designed to resist the hydrostatic pressure such that a permanent dewatering system (post-construction dewatering) will not be required.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 for a detailed discussion regarding recirculation.

Comment No. 26-54

The DEIR states that excavations will go to a depth of 45 feet. How was that depth determined?

Response to Comment No. 26-54

The maximum excavation depth of approximately 45 feet was determined based on the proposed development program described on pages II-12 to II-35 of Section II, Project Description, of the Draft EIR. As stated on page 36 of Geotechnologies' Preliminary Geotechnical Engineering Investigation included as Appendix E.1 of the Draft EIR, it is anticipated that excavations up to a maximum of approximately 45 feet in vertical height will be required to accommodate three levels of subterranean parking and related substructure. The excavation process will remove any unsuitable materials and compact per the recommendations discussed in the Preliminary Geotechnical Engineering Investigation included as Appendix E.1 of the Draft EIR. Refer to Response to Comment No. 26-55 for additional information regarding the depth of excavation.

Comment No. 26-55

Is the Project restricted from excavating beyond 45 feet below ground surface?

Response to Comment No. 26-55

The Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to pages II-12 to II-35 therein), and any substantial changes from the Project would be subject to further discretionary City review and subsequent CEQA compliance review per the proposed Specific Plan. As stated on page II-1 in Section II, Project Description, of the Draft EIR and throughout the Draft EIR, the Project would include excavations up to a maximum of approximately 45 feet below grade, which is based on the proposed development program described on pages II-12 to II-35 of Section II, Project Description, of the Draft EIR.

Comment No. 26-56

Given that depth of excavation, what is the nature and extent of dewatering required?

Response to Comment No. 26-56

Refer to Response to Comment Nos. 11-5 and 26-61 regarding estimated quantities of groundwater that may be extracted. The Dewatering Report in Appendix FEIR-13 of this Final EIR provides estimates of pumping rates, water-level drawdown, and cone of depression radius of influence for the estimated 21-month temporary dewatering period. See Figures 8A and 8B in the Dewatering Report for estimated temporary cones of depression and Table 1 in the Dewatering Report for estimated groundwater dewatering quantities.

Comment No. 26-57

What will be the rate, drawdown, and radius of influence of dewatering needed for construction?

Response to Comment No. 26-57

Refer to Response to Comment Nos. 11-25 for a summary of the drawdown and radius of influence estimated to result from temporary dewatering during construction of the Project. The Dewatering Report in Appendix FEIR-13 of this Final EIR provides estimates of pumping rates, water-level drawdown, and cone of depression radius of influence for the estimated 21-month temporary dewatering period. See Figures 8A and 8B in the Dewatering Report for estimated temporary cones of depression and Table 1 in the Dewatering Report for estimated groundwater dewatering quantities.

Comment No. 26-58

What will be the design of the dewatering system?

Response to Comment No. 26-58

As discussed in Addendum I, Response to Soils Report Review Letter prepared by Geotechnologies dated June 3, 2021 (included in Appendix E.3 of the Draft EIR), the Project is currently in the pre-approval process.

Once the final construction plans are prepared for individual buildings during the regulatory building permit process, the feasibility of a traditional temporary dewatering system with well points to draw down the water level will be evaluated. Additional dewatering and settlement analyses will be provided and submitted to the City of Los Angeles Grading Division for review and approval. For example, the number and type of groundwater extraction points for each excavation will be based on additional subsurface and hydrogeologic testing that takes into account the volume and rate of flow of water intercepted by the below grade levels.

While the dewatering system will be determined during the City's building permit process, specifically LABC Sections 1803.5.4 (which states that a subsurface soil investigation shall be performed to determine whether the existing groundwater table is above or within 5 feet below the elevation of the lowest floor level where such floor is located below the finished ground level adjacent to the foundation) and/or 1805.1.3 (which states that the design of a system to lower the groundwater table shall be based on accepted principles of engineering), in response to comments and for informational purposes, a dewatering evaluation is included in the Dewatering Report included in Appendix FEIR-13 of this Final EIR, which confirms the Draft EIR's conclusion that impacts associated with temporary construction dewatering would be less than significant. The dewatering system would include regulatory infiltration control measures, as necessary. The Dewatering Report analysis assumes cut-off walls will be installed to provide lateral groundwater infiltration control. However, this is only one example of a potential regulatory infiltration control measure, and other control methods will be considered when final construction plans are prepared during the regulatory building permit process. A final dewatering analysis will be performed upon the selection of the specialty contractor performing the dewatering scope. The final dewatering analysis will incorporate the experience of the specialty contractor and confirm the quantity and rate of flow once construction plans for individual buildings are prepared to develop a suitable temporary dewatering program.

Comment No. 26-59

Depending on the design of the system—number of wells, size of wells, spacing of wells—the extent of the impacts may vary.

Response to Comment No. 26-59

Refer to Response to Comment No. 26-58 for additional information regarding the design of the dewatering system. While the dewatering system design can affect the lateral and vertical extent of groundwater drawdown, as described in the Dewatering Report, regulatory lateral groundwater infiltration control measures are planned to be implemented as needed to reduce temporary groundwater drawdown off-site.

Comment No. 26-60

Please provide information as to the rate, drawdown, and radius of influence of dewatering needed for buildout by 2026 or 2043.

Response to Comment No. 26-60

As further described in Response to Comment No. 11-25, the Dewatering Report provided in Appendix FEIR-13 of this Final EIR provides estimates of temporary construction dewatering rates and drawdown cone of depression dimensions (also referred to as radius of influence) for the Area 2 excavation dewatering program that is estimated to occur over a 21-month period. Based on the Area 2 analysis, the dewatering quantities and cones of depression for the other excavations are estimated based on the similar assumption of a 21-month dewatering period for the 2026 buildout plan.

As discussed in Response to Comment No. 11-5, and as discussed in the Dewatering Report, the total amount of groundwater that would be dewatered during the temporary dewatering is approximately 26.4 million gallons (40,600 gpd).

With regard to the 2043 buildout scenario, recognizing groundwater conditions may have fluctuated slightly due to natural conditions (i.e., drought, precipitation events, etc.), the dewatering rates, quantities, and cone of depression estimates would be expected to be comparable to or less than the estimates for the 32-month buildout scenario given that the dimensions of the excavations are not expected to change between the two buildout scenarios.

Comment No. 26-61

How much water will be extracted and how will the water be disposed?

Response to Comment No. 26-61

Refer to Response to Comment No. 11-5 regarding the estimated quantities of groundwater that may be extracted and Response to Comment No. 3-7 the reuse or discharge of extracted groundwater.

Please see the temporary construction dewatering estimate quantities in the Dewatering Report that was prepared in response to comments, which is included in Appendix FEIR-13 of this Final EIR. As discussed therein, a total of approximately 26.4 million gallons, or 81 acre-feet, of groundwater would be extracted during the temporary construction dewatering. Please note that there are no active pumping wells within 1 mile of the Project Site, and the groundwater storage capacity of the Hollywood Subbasin in which the Project Site is located is reported to be approximately 200,000 acre-feet. The overall dewatering estimate of 81 acre-feet is therefore less the 0.05 percent of the basin capacity. Thus, the temporary construction dewatering program is anticipated to have a minor effect on the local groundwater resource.

As further discussed in Response to Comment Nos. 3-7 and 11-5, any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements, and, therefore, groundwater quality would not be negatively affected by potential dewatering activities.

Comment No. 26-62

What happens if the water is contaminated?

Response to Comment No. 26-62

Refer to Response to Comment No. 16-64 for a summary of how the extracted groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal method.

Comment No. 26-63

Given that the area is an oil field zone, hydrocarbons may well be issues that will need to be addressed and should be evaluated in the DEIR.

Response to Comment No. 26-63

Refer to Response to Comment No. 13-4 regarding hydrocarbons, the oilfield and the former gas stations and Response to Comment No. 16-64 regarding potential groundwater contamination and for a summary of how the extracted groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal methods. The nature and extent of petroleum hydrocarbon impacts in soil and groundwater at the Project Site are described in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Site Summary Report (Appendix G.1 of the Draft EIR), and various groundwater monitoring reports for the former Texaco station (see State of California Geotracker database; <https://geotracker.waterboards.ca.gov/>). Overall, while

hydrocarbons have been detected sporadically in each of the media, average concentrations for the Project Site are low.

Comment No. 26-64

There is some reference in the DEIR to a cut-off wall system. What exactly are the details of that system? Will it rely on sheet piles, well points, or some other design? How will it limit the construction dewatering and related impacts? What is the potential for leakage to occur through or below the cut-off wall? How does the design of the cut-off wall proposed for the Project address the potential for leakage? If construction of the Project is phased, how is the cut-off wall system implemented for a phased project? Have any pilot tests been completed for the system? Will some amount of dewatering still be required with such a system? How much? What impact will the cutoff wall have on adjacent properties? Will it cause a mounding effect on the neighboring properties? Could it impact structures, especially historic structures, on the neighboring properties? Do the neighboring properties have dewatering systems? If so, how will they be affected by the cutoff wall or Project dewatering?

Response to Comment No. 26-64

Refer to Response to Comment No. 26-58 regarding a summary of the dewatering system. As described therein, although a preliminary grading and excavation plan has been developed, additional and more detailed Project Site characterization will be performed as part of determining the means and methods of construction for individual buildings during the regulatory building permit process. Specifically, the specific means and methods for potential site retention and dewatering systems for individual buildings will be developed for the various excavations based on the elevations of water bearing strata, flow rates and varying sizes, locations and depths of the excavations. Depending on the results of the detailed Project Site characterization, the final dewatering system may or may not include a cut-off wall. The final dewatering system methods, phasing, potential pilot tests, and shoring design (per Section 1812 and 3307 of the Los Angeles Building Code), which are subject to regulatory control for safety and subsidence, will be submitted to LADBS for review and approval as part of the building permit processes prior to construction.

A Dewatering Report is provided in Appendix FEIR-13 of this Final EIR. The report presents estimates of groundwater dewatering quantities and drawdown cone of depression dimensions. The analysis uses modeling to conclude an approximation of a vertical cut-off wall system can reduce dewatering quantities and the estimated surrounding groundwater drawdown cone of depression by impeding lateral groundwater flow into the excavations. While a cut-off wall is estimated to significantly impede lateral groundwater inflow into the proposed excavations, in practice some leakage can occur. The cut-off wall

may also be able to be founded into a low permeability clay or silt layers to impede groundwater leakage into the excavation bottoms. During the temporary construction dewatering program and including the potential use of a cut-off wall, temporary water level declines are expected due to the active groundwater pumping and groundwater mounding is not expected.

None of the neighboring properties are known to have dewatering systems, thus the temporary construction dewatering is not expected to create interference with neighboring structures, including historic structures. Appendix D of the Dewatering Report presents a geotechnical analysis that concludes that subsidence associated with dewatering would be negligible and have a less-than-significant impact on surrounding properties, including historical buildings.

Comment No. 26-65

While information regarding construction dewatering is insufficient, information regarding operational dewatering is completely missing from the analysis of the Project. The only reference to operational dewatering for the Project is the description of methane systems. The DEIR otherwise assumes no ongoing extraction of groundwater after Project construction. What analysis in the DEIR supports the assumption that there will be no dewatering required after the Project buildings are constructed?

Response to Comment No. 26-65

As discussed in Response to Comment No. 11-5, the Project would require temporary construction dewatering and not permanent dewatering. Per Project Design Feature GEO-PDF-1, the proposed below-grade parking structures will be designed to resist the hydrostatic pressure such that a permanent dewatering system (post-construction dewatering) will not be required.

Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts. As discussed therein, the temporary dewatering system would be installed and operated in accordance with the NPDES discharge permit or industrial sewer permit requirements, and the specific dewatering system will be determined during the City's building permit process. Nevertheless, in response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes, the Dewatering Report. The Dewatering Report confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant.

Comment No. 26-66

The discussion of the methane systems suggests that it will be required (the Project is in a methane zone). If there is no operational dewatering, then how will the integrity of the building systems and methane systems be insured?

Response to Comment No. 26-66

Refer to Response to Comment No. 13-6 regarding methane gas control.

Comment No. 26-67

On the other hand, if an operational dewatering system is implemented, then what will be the nature and extent of the dewatering? Where is the analysis of the impacts of such system? How will the dewatering systems be designed? What will be the design of the wells and piping? What will be the rate, drawdown, and radius of influence of dewatering needed after the Project buildings are completed?

Response to Comment No. 26-67

As discussed above in Response to Comment No. 65, the Project would not include permanent dewatering during operations. Refer to Response to Comment No. 26-69 below for a discussion of construction dewatering.

Comment No. 26-68

Is there dewatering at the Project Site today? What is the nature and extent of that dewatering? Was that information taken into consideration in developing the Project plans?

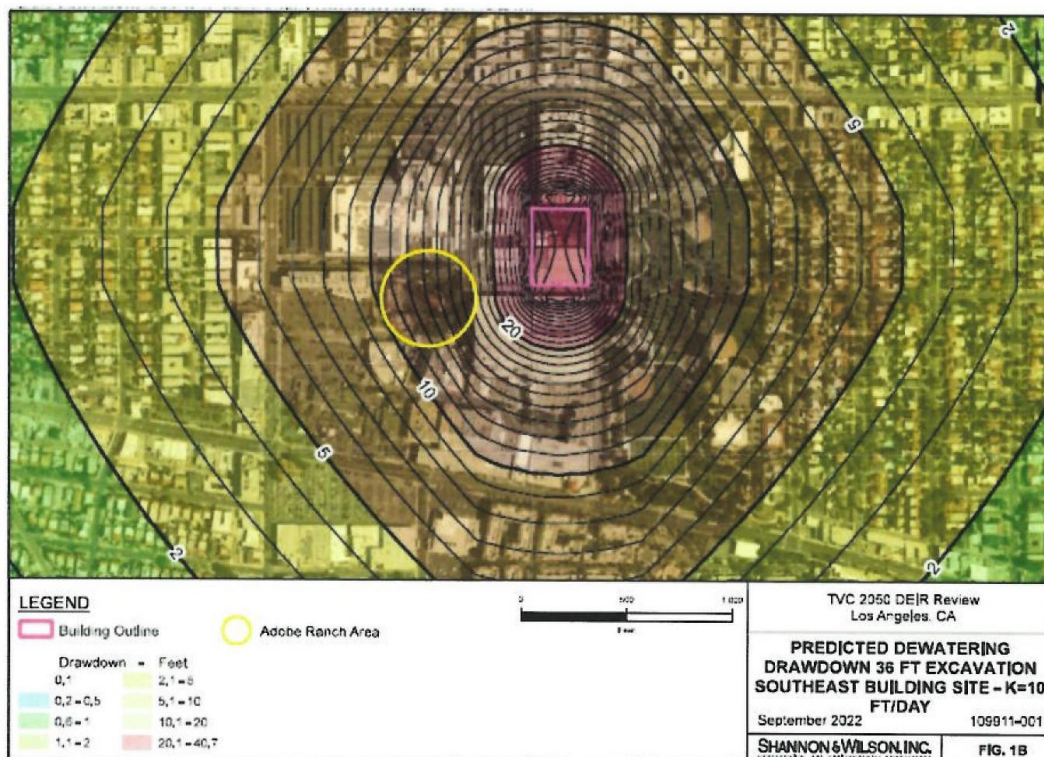
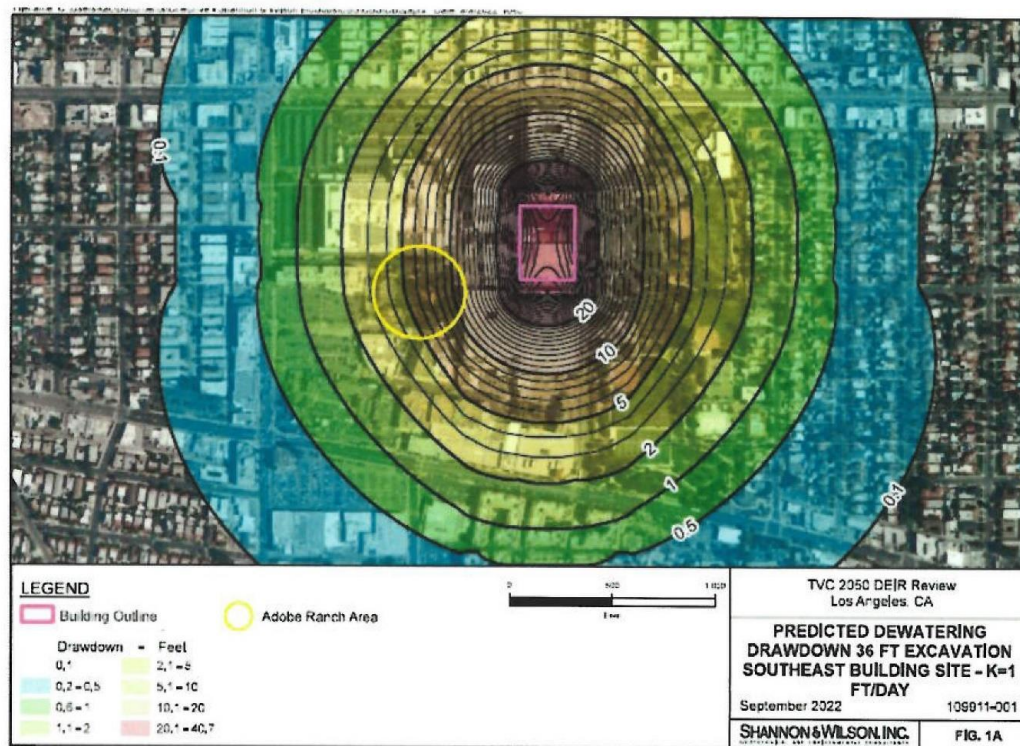
Response to Comment No. 26-68

There is no dewatering system at the Project Site under existing conditions.

Comment No. 26-69

By failing to fully assess the potential extent of construction and operational dewatering, the DEIR fails to disclose the related geotechnical impacts, such as settlement or subsidence impacts from dewatering. Specifically, there may be potential impacts to existing historic structures, utilities, rights of way, and adjacent structures. These impacts may be significant. As depicted in the following graphics from the Shannon & Wilson Report, attached as Exhibit 3, dewatering during construction or operations could impact

groundwater levels several thousand feet from the Project site. The DEIR must disclose the extent of dewatering and related impacts.



Response to Comment No. 26-69

Operational dewatering is not proposed for the Project. See the Dewatering Report in Appendix FEIR-13 of this Final EIR for a description of the temporary groundwater dewatering analysis during construction, as well as a confirmatory settlement analysis from Geotechnologies included as Appendix D of the Dewatering Report which confirms the Draft EIR's conclusion that potential impacts related to settlement during the temporary construction dewatering would be less than significant. The Dewatering Report was prepared in response to comments and confirms the Draft EIR's conclusions that impacts related to dewatering would be less than significant. The analysis concludes the groundwater dewatering quantities and drawdown dimensions displayed in Figures 1A and 1B of this comment are based on incorrect assumptions and methodologies that overestimate the nature of the anticipated impacts to groundwater as discussed further below:

- The dewatering analysis attached to this comment letter assumed “unrestrained (no cut-off walls)” or no infiltration control measures for the dewatering program. Excavation infiltration control measures are described in the Draft EIR and will be implemented during construction dewatering if necessary, the application of which would significantly reduce dewatering volumes and drawdown dimensions as compared with the analysis in this comment letter. Further, the dewatering analysis attached to this comment letter and cones of depression calculations assume achieving 36 feet of drawdown for a proposed excavation (Area 6) that only extends 17 feet into groundwater. Both of these incorrect assumptions result in substantially overstating the anticipated nature of the dewatering quantities and cone of depression dimensions.
- The dewatering analysis attached to this comment letter uses an analytical solution (i.e., approximation of *Theis equation*, an analytic solution for the drawdown in a confined aquifer) without providing the parameter assumption details, such as “an appropriately large storage coefficient is used.” Dewatering would be performed over a 21-month period during Project construction. The amount of dewatering is related to pumping over time and thus is a time-dependent variable that is best analyzed with a time-dependent approach like the combined steady state and transient model used in the Dewatering Report. Although the documentation is limited, it is our understanding the dewatering analysis attached to this comment letter using this equation does not consider time, but rather estimates a theoretical maximum drawdown that overstates the drawdown for temporary dewatering. A time-dependent steady state and transient model analysis has been prepared to more accurately simulate the 21-month dewatering period.
- An inaccurate, simplifying assumption of the *Theis equation* analysis is that the water-bearing materials are assumed to be isotropic (i.e., the material properties are equivalent in all directions), which do not consider vertical anisotropy in the

common silt- and clay-bearing layers of Project Site soils. As described in Section IV.D, Geology and Soils, and Appendix E of the Draft EIR, as well as the Dewatering Report, the majority of the Project soils are fine-grained silt and clay-bearing materials that have a strong anisotropy that substantially reduce groundwater flow. It is expected that due to the predominance of fine-grained clay and silt layers, vertical migration rates will be substantially lower than horizontal flow rates, potentially limiting upward flow rates into the excavation bottoms. The Dewatering Report uses a three-dimensional model that accurately accounts for the properties of the soil within the Project Site.

- The dewatering analysis attached to this comment letter used hydraulic conductivity (K) values of 1 and 10 feet/day. No reference is provided other than to base the values on an “overall silty sand” composition, which is not reasonable or representative of the Project Site soils. The analysis in the Dewatering Report is based on site-specific data, including four CPT/HPT borings, and published references that supports the use of a lower K value of 0.1 foot/day, which is more representative for the bulk of the water-bearing materials based on the actual geology of the Project Site, which consists mostly of silt and clay layers. The K value of 10 feet/day used in the commenter’s analysis is more representative of a sand, and their assumption of 1 to 10 feet/day is 10 to 100 times greater than the results of the Project Site-specific analysis in the Dewatering Report.
- The commenter describes the use of an unstated “appropriately large storage coefficient” in their analysis. In an unconfined aquifer analysis, the storage coefficient is virtually identical to specific yield (the S_y of a soil or rock is the ratio of the volume of water that, after saturation, can be drained by gravity to its own volume). The Dewatering Report evaluated published data that supports an S_y of 10% for the bulk aquifer due to the significant proportion and quantity of fine-grained silt- and clay-bearing water bearing soils.
- The analysis attached to this comment letter assumes incorrect excavation depths. For example, the analysis assumes a 36-foot excavation depth near the southeast corner of the Project Site. The excavation depths for the Project are shown in Figure 3 of the Soil Management Plan (included in Appendix G.1 of the Draft EIR), and this figure is also included as Figure 3 of the Dewatering Report. As shown therein, the estimated excavation depth for the southeast portion of the Project Site (Area 6) is 27 feet. Thus, the commenter’s analysis assumes a greater depth than is planned and thus overestimates anticipated drawdown dimensions in this area.

Thus, the methodology, assumptions and inputs used in the dewatering analysis attached to this comment letter are not representative of the Project’s temporary dewatering program or Project Site conditions and substantially overestimates the dewatering quantities and cone of depression dimensions.

Refer to the technical memorandum prepared by Geotechnologies included as Appendix D of the Dewatering Report. As discussed therein, given the long-term water level fluctuations recorded in the vicinity of the Project Site (due to seasonal changes and regulatory-approved activities), the anticipated groundwater drawdown will only be up to 3.5 to 7 feet below previously recorded water levels for the Project vicinity. As stated in Appendix D of the Dewatering Report, this small amount of drawdown will have less than significant subsidence effects on the surrounding properties adjacent to the excavation, and it is anticipated that the drawdown effects will result in less than 0.5 inch of settlement for areas located in the immediate surrounding vicinity of the Project. The magnitude of any potential settlement will decrease with increased distance away from the excavation. For properties located further away from the excavation, where the depth of temporary dewatering drawdown will be approximately equal to the recorded long-term groundwater level fluctuation, the anticipated subsidence effects as a result of dewatering will be negligible.

LADBS requires a maximum deflection of 0.5 inch for all shoring systems where a structure is located within a 1:1 surcharge plane (45-degree angle) projected up from the base of the excavation. Where there are no structures located within a 1:1 surcharge plane extending up from the base of the excavation, the maximum lateral deflection of 1 inch at the top of the shoring system is accepted by LADBS. Refer to Appendix D of the Dewatering Report for further discussion of the applicable regulatory requirements. One half inch of horizontal or vertical movement is required by the City during the regulatory building permit process for individual structures and is widely accepted and adopted by design professionals and construction industry standard of acceptance and is considered to be well within the structural tolerance of a well-designed structure. The Project would be required to comply with this requirement and all other applicable regulatory requirements related to the temporary dewatering and shoring.

Comment No. 26-70

The DEIR inappropriately defers the analysis related to dewatering. The Project's June 3, 2021 response to the City's Department of Building and Safety May 21, 2021 Soils Report Review Letter states "once the design of the proposed structures and depth of the proposed subterranean levels achieve more definition.... Additional dewatering and settlement analysis will be provided and submitted to the City ... for review and approval if the shoring and dewatering system changes from a cut-off wall system." This deferred analysis relates back to the fundamental failure described above regarding the lack of an accurate, stable, and finite Project description. First, the EIR must assess and disclose the impacts now. If the Project allows for changes in the methodology regarding dewatering changes, the public, especially the neighboring property owners that could be most affected by dewatering impacts, should have an opportunity to review and comment.

Response to Comment No. 26-70

Refer to Response to Comment Nos. 3-7, 11-5, and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts under CEQA. Refer to the Dewatering Report in Appendix FEIR-13 of this Final EIR for an analysis of the potential groundwater drawdown pertaining to temporary construction dewatering. As is City practice, the dewatering system will be determined during the City's building permit process. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the accurate, stable, and finite Project Description.

With regard to notification, all dewatering methods will be designed and submitted to the local jurisdictions for review and approval including LADBS' Grading Division, LARWQCB and/or LASAN in accordance with building code and all other applicable regulatory requirements.

Comment No. 26-71

Aside from the dewatering issues associated with excavation, how will the excavations be supported? Have the potential impacts to adjacent properties to the east and south been assessed? Does the Project propose to have tieback anchors extend into adjacent properties? How can the Project presume to rely on a neighboring property for such structural support? Has any assessment of the impacts of such tiebacks been completed? Such information should be made available to the neighboring property owners for review as part of the DEIR. The details of the support for the excavations, potential impacts to the neighboring property owners, and application of appropriate mitigation must be included in a recirculated DEIR.

Response to Comment No. 26-71

Temporary shoring will be required for the excavation of the proposed below-grade levels. As with all other projects in the City, the specific means and methods of shoring will be developed during the City's building permit process. Several methods of shoring systems exist and may be comprised of cantilever and/or restrained elements depending on the depth of the excavation. Restrained shoring may consist of tiebacks and/or internal restrained system (raker footings). Any tiebacks extending below adjoining neighboring properties will require written consent of the adjacent property owner or the owner's authorized representative. The written consent shall be notarized and a copy of said consent shall be filed with the City of Los Angeles Department of Building and Safety before a permit for such work may be issued, as is required by Section 7006.6 of the Los Angeles Building Code. In lieu of tiebacks, the shoring system may also be designed utilizing internal bracing or raker footings installed internal to the Project Site for bracing of the shoring system, if necessary.

The design of the shoring systems will be consistent with all applicable regulatory requirements, including, but not limited to Sections 1812 and 3307 of the Los Angeles Building Code (LABC) and best trade practices to preserve the integrity of all surrounding land and ensure the protection of construction workers. Inspections of shoring installations, surveying, and monitoring requirements will be incorporated and detailed in the final shoring plans, as required by the local jurisdiction as part of the plan review and approval process. All plans for shoring will be submitted for review and approval by the local jurisdiction prior to construction.

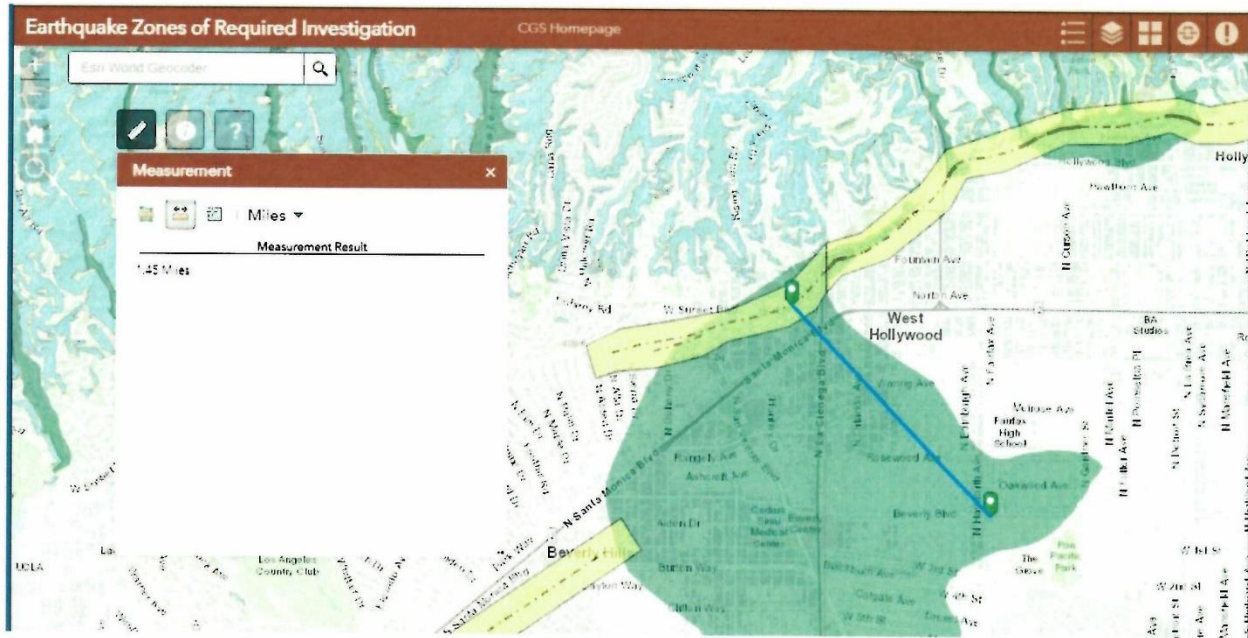
This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 for a detailed discussion regarding recirculation.

As discussed in Response to Comment No. 3-7, per Project Design Feature GEO-PDF-1, the proposed below-grade parking structures will be designed to resist the hydrostatic pressure such that a permanent dewatering system (post-construction dewatering) will not be required.

Comment No. 26-72

DEIR Includes Incorrect Fault Information

The DEIR states that the Project is approximately 1.7 miles to the south of the Hollywood Fault. (DEIR, p. IV.D-19.) That is incorrect. Per the California Department of Conservation and California Geological Survey, the Hollywood Fault passes 1.45 miles from the Project’s location, which is also located in a liquefaction zone. Therefore, the DEIR’s conclusions regarding the Project’s exposure of the building’s occupants to risk of loss, injury, or death due to strong seismic ground shaking is based on an incorrect assumption regarding the distance to the Hollywood Fault. The DEIR’s conclusions must be reassessed to reflect the Project’s closer proximity to the Hollywood Fault.



Response to Comment No. 26-72

As discussed on page IV.D-19 in Section IV.D, Geology and Soils, of the Draft EIR, the Hollywood Fault is located to the north of the Project Site. As stated therein, the Project Site is located approximately 1.7 miles from the Hollywood Fault, as measured from the center of the Project Site. The distance from the northwest corner of the Project Site to the closest mapped trace of the Hollywood Fault is approximately 1.45 miles. The specific point of measurement does not affect the conclusions regarding the Project's exposure of the building's occupants to risk of loss, injury, or death due to strong seismic ground shaking as the analysis is based on the Preliminary Geotechnical Engineering Investigation approved by the City (refer to Appendix E.1 of the Draft EIR) that is based on detailed mapping of the Project Site (refer to Figure II therein). This mapping is consistent with the mapping provided in this comment.

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and, therefore, the performance of a fault rupture study is not required. However, it is located within a mapped liquefaction zone requiring site investigation to address the potential of seismic related hazards. Liquefaction analyses were performed in accordance with CGS Special Publication 117A⁵⁰ and the Earthquake Engineering Research Institute (EERI)

⁵⁰ California Geological Survey (CGS), Special Publication 117A Guidelines for Evaluating and Mitigating Seismic Hazards in California, 2008.

Monograph⁵¹ (refer to pages 9 and 16 of the Preliminary Geotechnical Engineering Investigation report in Appendix E.1 of the Draft EIR). The results of the liquefaction analyses indicated that the liquefaction potential of the Project Site is low under the Peak Ground Motion.

Comment No. 26-73

E. Greenhouse Gas

Deficiencies in Trip, VMT, and Emissions Calculations Carry Over to GHG Section

All of the omissions and mistakes associated with calculations and disclosure of the Project's trips (cars and trucks, transit use, etc.), VMT, and emissions calculations for DPM, TACs, and criteria pollutants, as detailed in this comment letter, carry over to the GHG Section. Those issues must be corrected before the DEIR can accurately calculate the Project's GHG emissions. As such, the DEIR needs to be revised and recirculated so that the public is informed of the Project's actual GHG emissions.

Inaccurate GHG Emissions Calculations

In addition to errors noted in other comments, the calculations involving the existing solar array are inaccurate, resulting in an underestimate of the existing Project Site GHG inventory as detailed in the Ramboll Report. (DEIR at p. IV.E-39.) In Table IV.E-5, the annual emissions reduction from the existing solar array is estimated as 544 MT CO₂e. This calculation uses the 2019 LADWP grid intensity factor, and thus assumes an operational year of 2019 for the solar array. However, all other emissions in Table IV.E-5 are estimated from the CalEEMod run for existing conditions, which has an operational year of 2021. To align with the CalEEMod run, the solar emissions should be estimated using the 2021 LADWP grid intensity.

The DEIR has not incorporated any natural gas and electricity data for the existing uses. The DEIR included such information for water, but it is not clear why this data was collected only for water consumption and not natural gas and electricity. The existing Project Site must have utility bills and/or metering data available that would provide a more accurate and site specific baseline. The DEIR should provide greater transparency on this issue and for consistency also use existing data on natural gas and electricity usage for the existing conditions. On page 310 of Appendix B, the RPS emission factor calculation table is presented; however, this table inaccurately calculates the CO₂ emission factor based on RPS benchmarks and does not clearly outline the methodology used in order to find the

⁵¹ Idriss, I.M and R.W. Boulanger, Soil Liquefaction During Earthquakes, 2008.

final emission factor used in the analysis. A carbon intensity of 520 lbs/MWh is provided in the first part of the table for 2026; however, in the second part of the table, this is presented as 585 lbs/MWh. There is no clear reasoning for why these two values differ, or how this value was ultimately calculated. As indicated in the Ramboll Report, using the most up-to-date power label from Los Angeles Department of Water and Power for 2020 provides a GHG intensity of 579 lbs CO₂e/MWh for 36.7% eligible renewables. Using the percent renewables and GHG intensity to calculate the carbon intensity for the years given in the table on page 310 gives values that differ from the provided value. The Project must provide further documentation on their RPS calculation and update the emission factor using the most up-to-date information available.

On page 309 of Appendix B, the DEIR provides an unsubstantiated GHG emission reduction for electric vehicle parking. This calculation notes in footnote 4 that 20% of the miles charged would be driven by the electric vehicle. However, in the actual calculation, a value of 10% is instead used, with no basis given for either of these values. The DEIR also reduces the energy consumption of the charging stations by 90% thereby underestimating the total electricity usage for the charging stations by 90%. As a result, the Project's electricity demand on-site and the emissions generated from electricity use have been underestimated. Please clarify which is the correct factor and correct the analysis.

Response to Comment No. 26-73

This comment misconstrues information provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. Please refer to Response to Comment Nos. 26-30, 26-35, and 26-E.1-16, which further detail the construction and operation vehicle trips and VMT assumed in the air quality and GHG emissions calculations.

The electricity generation from the existing solar array correctly identified Year 2019 (the latest year of data available during the preparation of the Draft EIR). However, this comment correctly identifies that the GHG reduction from existing solar panels identified in Table IV.E-5 (Existing Project Site Annual GHG Emissions Summary) on page IV.E-39 of Section IV.E, Greenhouse Gas Emissions, of the Draft EIR was incorrectly based on a Year 2019 carbon intensity factor. GHG emissions associated with existing solar panels have been updated in Appendix FEIR-9 to use a Year 2021 carbon intensity factor. As shown on pdf page 309 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, electricity generation from the existing solar array under the future no project condition correctly used a Year 2026 carbon intensity factor. As such, Project incremental GHG emissions reported in Table IV.E-11 (Annual Project GHG Emissions Summary) on page IV.E-78 of the Draft EIR would remain unchanged.

Please refer to Response to Comment No. 26-E.1-33 and the Energy Consumption Memorandum included as Appendix C of Appendix FEIR-9 of this Final EIR for a

discussion of natural gas and electrical demand for existing uses, and how the Draft EIR conservatively used CalEEMod rather than utility data for the existing uses.

Please refer to Response to Comment No. 26-E.1-34 for a discussion of the carbon intensity factors used in the Draft EIR analysis.

Please refer to Response to Comment No. 26-E.1-36 for a discussion relating to energy-related emissions associated with electric vehicle parking.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-74

DEIR Undercounts Emissions by Failing to Include Basecamps, Production Areas and Mobility Hub in Analysis

As described above, the DEIR does not appear to evaluate emission sources from uses within the basecamps, production zones, and Mobility Hub in its analysis. Just because the DEIR states that the Project is redefining floor area to exclude basecamp activities and other production zones that are happening in below grade areas or in parking structures, this does not mean that there are not emissions associated with these activities. Notwithstanding that the Project’s definition of floor area is inconsistent with the LAMC, the impacts from how the space is to be used must be analyzed. The proposed uses in the basecamps, production zones and Mobility Hubs will emit GHGs. Further, any electricity used in these spaces will have indirect GHG emissions. These were not accounted for in the GHG analysis.

The DEIR’s analysis of water usage includes both basecamps’ and the Mobility Hub’s usage, why wasn’t the same analysis done for GHG impacts? The DEIR must be revised to account for GHG emissions from basecamps, production zones and the Mobility Hub and recirculated for public comment.

Response to Comment No. 26-74

Please refer to Response to Comment No. 26-E.1-28 regarding the analysis of emissions associated with basecamp and the Mobility Hub. As provided in Topical Response No. 10, Trip Generation, the trip volume data included all Project-related trips, including basecamp trips.

As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 26-36 and 26-E.1-28, Project emission modeling accounted for the entirety of the Project, not just the uses meeting the definition of “floor area.” Please see Response to Comment No. 26-E.1-23 for a discussion of the vehicle trip effects of the Mobility Hub, which would be expected to reduce vehicle trips, and thus GHG and energy demands, associated with Project operations.

Please note that no active production activities or uses would be located in the parking or basecamp areas below Project Grade. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-75

DEIR Ignores CARB’s 2022 Scoping Plan Update

The DEIR completely ignores the most important plan for addressing climate change impacts and decarbonizing California: CARB’s 2022 Scoping Plan Update (the “Update”) even though it was published in May 2022-before the DEIR was released (available at <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>).

The Project as designed is not consistent with the Update, particularly given the Project’s 2043 buildout date. The Update, in Appendix D (Local Actions), underscores that “local governments have tremendous opportunity to reduce GHGs in these three strategy areas: 1. Transportation electrification 2. VMT reduction 3. Building decarbonization.” (Update, Appendix D at 4.) The DEIR fails to address the Project’s consistency with these strategies.

The DEIR must evaluate the Project in the context of the Update’s findings:

- “CEQA can be a powerful and useful tool to engage the public, identify additional opportunities to support climate efforts, and localize change. It is important that lead agencies look for ways to use CEQA to support these core purposes, ensuring that these processes do not become sources of delay but instead unlock more opportunities. Mitigation measures applied in the communities impacted by projects subject to CEQA have the added benefit of improving

health, social, and economic resiliency as climate impacts worsen.” (Update at 220.)

- “Lead agencies should prioritize on-site design features and GHG mitigation measures that reduce GHG emissions, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. After exhausting all the on-site GHG mitigation measures, CARB recommends prioritizing local, off-site GHG mitigation measures, including both direct investment and voluntary GHG reduction or sequestration projects, in the neighborhoods impacted by the project. This could include, for example, development of a neighborhood green space, investment in street trees, or expansion of transit services. Implementing GHG mitigation measures in the project’s vicinity would allow the project proponent and the lead agency to work directly with the affected community to identify and prioritize the mitigation measures that meet their needs while minimizing multiple environmental and societal impacts.” (*Id.*)
- “Once all potential on-site and local off-site GHG mitigation measures have been incorporated to the extent feasible, other voluntary offsets issued by a reputable voluntary carbon registry (as listed on CARB’s website) may be appropriate.” *Id.* at 220–221.

The DEIR fails to implement the measurements identified by CARB to reduce emissions, improve public health, and address climate impacts.

Response to Comment No. 26-75

CARB’s 2022 Scoping Plan Update, referenced by the commenter, was published in draft form on May 10, 2022, and was not finalized until November 16, 2022. The Draft EIR was published on July 14, 2022, months before the finalization of the 2022 Scoping Plan Update. Contrary to the commenter’s assertions, the Draft EIR analyzed the Project’s consistency with key aspects of CARB’s Climate Change Scoping Plan and cumulative updates, as analyzed in Tables IV.E-6 and IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. This analysis was properly based on the 2008 Scoping Plan and subsequent updates (through 2017) that had been adopted at the time the Draft EIR was prepared and published, consistent with CEQA. CEQA requires that an EIR “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.”⁵² An “applicable” plan is a plan that has already been adopted and thus legally applies to a project; draft plans need not be evaluated.⁵³ The date of the

⁵² CEQA Guidelines § 15125(d).

⁵³ *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145.

publication of the EIR, rather than a project's buildout date, is what determines which plans are applicable under CEQA.

As indicated in the comment, the 2022 Scoping Plan Update includes Appendix D, which is focused on actionable strategies for local governments to contribute to achieving State climate goals. The strategies in Appendix D reflect CARB's recommendations and are not binding on local lead agencies. Further, the project-level strategies in Appendix D only apply to residential and mixed-use projects, which the Project is not. Of these strategies, only the improved public mobility options, TDM, all-electric new construction, and renewable energy deployment are potentially applicable at a project level, and each of these strategies are already included in the currently proposed Project through the implementation of Project Design Feature TR-PDF-2 (mobility and TDM), Project Design Feature GHG-PDF-2 (renewables), and additional PDFs presented in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Those measures require the use of all electric off-road operational equipment, and provision of electrical tie-ins at basecamps. In addition, the Project would comply with City Ordinance 187714, which was adopted after the publication of the Draft EIR and requires all newly constructed buildings to be all-electric, with certain exceptions. Additionally, as stated on page IV.E-51 of the Draft EIR, the Project would comply with the City's Green Building Ordinance EV charging requirements.

The Draft EIR not only contains numerous PDFs and mitigation measures that reduce Project GHG emissions, as discussed in pages IV.E-50 through IV.E-51 therein, but also includes off-site investments consistent with the mitigation strategies of the CARB Scoping Plan, such as Project Design Feature TR-PDF-4, which would include direct monetary contributions to transportation management systems in the Project area. Neither CEQA nor the 2022 CARB Scoping Plan Update requires the purchase of offsets in the case of the Project, which would have a less-than-significant impact with respect to GHG emissions.

For informational purposes, refer to Appendix B-2 of Appendix FEIR-9 of this Final EIR for a detailed discussion of the Project's consistency with the 2022 Scoping Plan Update. As concluded therein, the Project would not conflict with the applicable policies in the 2022 Scoping Plan Update.

Comment No. 26-76

Consistency with SCAG SCS/RTP

The DEIR relies very heavily on the Project's alleged consistency with SCAG's SCS/RTP to find that the Project is consistent with the State's decarbonization efforts. The SCS/RTP itself is supposed to reduce VMT. However, the DEIR does not address a recent Progress

Report from CARB that found that the SCS/RTP is failing to reduce VMT. See CARB, Draft 2022 Progress Report California's Sustainable Communities And Climate Protection Act (June 2022). As such, even if the Project were consistent with the SCS/RTP, the DEIR does not explain how the Project would meet the State's VMT and GHG reduction goals.

Below are some of the key findings in the Progress Report. Given the Specific Plan and proposed Regional Center nature of the Project and likely extent of VMT as discussed in other sections of this comment letter, the DEIR should address these issues specifically.

- “Californians are driving more—leading to more pollution, higher costs, and worse day-to-day experiences—despite State planning statutes that encourage better transportation and planning decisions. The core problem is that even well-made plans too often remain as plans, rather than becoming realities. The gap between intention and action impairs our daily quality of life, and harms are worst in communities that have already borne the brunt of car-dependent planning in the past.” (Progress Report at 4.)
- “Implementation of SCS plans is essential to meeting the State's climate goals. Under SB 375, MPOs estimate the combined impact of transportation, land use, and housing development patterns included in the RTP/SCSs on per capita GHG emissions. The impacts to GHG emissions are based primarily on changes to vehicle travel, as measured by per capita vehicle miles traveled (VMT).” (*Id.*)
- “For this 2022 Progress Report, CARB collected and analyzed data for over two dozen indicators to tell a more complete story regarding land use and housing trends; travel behavior; and whether transit, carpooling, and active transportation have become more convenient and frequent choices relative to driving. For the first time, CARB is including metrics for VMT by region, accessibility to key destinations, housing activity by income level, units with a density bonus or inclusionary deed restrictions, and Greenhouse Gas Reduction Fund spending.” (*Id.* at 5.)
- “Unfortunately, since the first report, most trends demonstrate limited progress in meeting the targets through 2019. While some limited progress on VMT reduction has been observed within the largest MPO regions where most Californians live, it has not been enough. There is an urgent need to build on the good work that has produced some positive change in these regions in light of the overall trajectory. Many trends moved in the wrong direction, away from advancing climate goals and showing worsening inequality. Although the 2020 data were not available for this report, the COVID-19 pandemic further impacted the ability of regions to implement SCSs as commute patterns, construction and building supply chains, transit use, and the general economic downturn disrupted land use and transportation activity.” (*Id.*)

- “California is still not reducing GHG emissions from personal vehicle travel as needed under SB 375. Per capita GHG emissions and per capita VMT continued to increase....” (Progress Report at 6.)
- “Increases in per capita GHG emissions and per capita VMT are observed in nearly all MPO regions.” (*Id.*)
- “Californians are still choosing to drive.” (*Id.*)
- “In general, from 2005 to 2019, Californians continued to drive more, and carpool less, when traveling to work.” (*Id.*)
- “Furthermore, while transit service hours either remained steady or grew in most regions between 2005 and 2019, data show transit boardings in most MPO regions decreased during the same period, especially starting in 2014. Although the transit ridership decline was occurring before the COVID-19 pandemic, a sharp decline in all regions due to the pandemic compounds the challenge to attain ridership at the levels identified in SCSs.” (*Id.*)

The DEIR’s discussion of consistency with the SCS/RTP should be revised to address the Progress Report.

Response to Comment No. 26-76

The Project’s consistency with the current 2020–2045 SCAG RTP/SCS is adequately detailed in pages IV.E-54 through IV.E-65 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. While the progress report referenced by the commenter may question the efficacy of the statewide implementation of the RTPs/SCSs, CEQA does not obligate an individual project, at the project level, to overcome regional or statewide deficiencies, actual or purported, in implementing the applicable plans and policies with which a project is required to comply. If SCAG or CARB were to have published revisions or updates to the RTP/SCS before the Draft EIR was published, an updated analysis of consistency would have been included in this Final EIR. At the time of publication, the 2020–2045 SCAG RTP/SCS reflects the currently adopted RTP/SCS applicable to the Project, and the Draft EIR’s consistency analysis is appropriate and complete.

Please see Response to Comment No. 26-E.1-22 for an explanation of how the findings of the CARB Progress Report are not applicable at the project level and do not reasonably suggest any inadequacy with respect to Project Design Feature TR-PDF-2.

Comment No. 26-77**The DEIR Must Address Electrification Policies Given the 2043 Buildout of the Project**

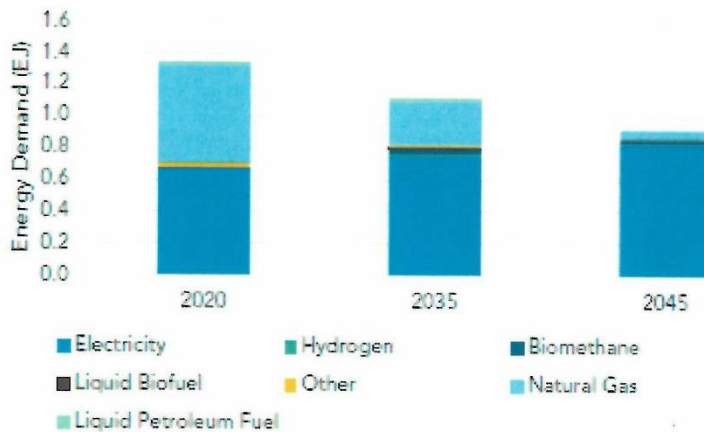
The Update includes a 44-page Appendix F on electrification. As explained therein, the Update “establishes three main goals for buildings to reduce emissions for both GHGs and air pollution: 1) energy efficiency aligned with the mid-high (electric) and mid-mid (gas) scenarios from the 2019 Integrated Energy Policy Report; 2) new construction would be zero-emission starting in 2026 for residential buildings and 2029 for commercial buildings through alignment of state and local authorities; and 3) all new appliances sold in California would be zero-emission by 2035 for installation in homes and by 2045 for installation in commercial buildings.” (CARB, Update, Appendix Fat 1.) In Appendix F, Table 1 (Technical readiness of zero-emission space conditioners) and Table 2 (Technical readiness of zero-emission building water heaters) establish that electric space and water heating for both large and small commercial buildings are not only technically feasible but also commercially available today.

The DEIR should discuss how natural gas hookups and a 2043 buildout are consistent with the below:

- “All-electric new construction is one of the most cost-effective near-term applications for building decarbonization efforts.” (*Id* at 14.)
- “New construction of all-electric buildings also helps to avoid investments in what would become stranded assets of gas pipelines that may no longer be in use the next thirty years.”
- “Each year, about 120,000 new homes and more than 100 million square feet of commercial buildings are newly constructed across California. These new buildings will represent between a third to half of the total building stock by midcentury. Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings, and will rely primarily on advancing energy efficiency while replacing gas appliances with electric alternatives.” (Update at 170.)
- Strategies for success include: “End fossil gas infrastructure expansion for newly constructed buildings.” (*Id* at 172.)

The Update figure below shows the degree of electrification that is needed in 2045, a mere 2 years after the Project buildout.

Figure 4-8: Final energy demand in buildings in 2020, 2035, and 2045 in the Proposed Scenario



Response to Comment No. 26-77

Since the publication of the Draft EIR, the City has adopted Ordinance 187714, requiring all newly constructed buildings to be all electric (i.e., no natural gas emissions), with limited exceptions. New PDFs reflecting this new ordinance have been added for the Project that require the use of all electric off-road operational equipment (including landscaping equipment) and providing electrical tie-ins at basecamps. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for the details regarding these PDFs. As such, the inclusion of natural gas space and water heaters in the Draft EIR analysis constitutes a conservative assessment of local pollutant GHG emissions. The modeling output files, included as part of Appendix FEIR-9 of this Final EIR, present an updated estimate of operational GHG emissions incorporating building electrification and the additional PDFs using CalEEMod Version 2022.1.1. This confirmatory analysis does not change any of the less than significant conclusions in the Draft EIR's GHG analysis.

Comment No. 26-78

F. Hazards

The DEIR's analysis of Hazards and Hazardous Materials is flawed. It must be revised to address the comments below and in the Ramboll Report and be recirculated for public review and comment.

As a preliminary matter, the baseline condition for hazards is unclear. The DEIR should more clearly explain what hazardous materials are present at the Project Site, how the materials are handled, stored and disposed, in what quantities and what environmental regulatory permits the Project Site operations currently have or require. What hazardous materials are used on the Project Site today? In what quantities? Which regulatory

permits does the Project hold or require? The DEIR should list the regulatory permits and compliance status.

The DEIR should then explain how hazardous materials usage will change with the Project (e.g., types, quantities, etc.) and how the materials will be managed during construction and operation. Will the Project increase the use of hazardous materials? How? By how much? Which materials? The DEIR summarily states that the Project would continue to “involve the routine use of small quantities of potentially hazardous materials typical of studio campuses.” (DEIR IV.F-47) What does that mean? What are small quantities? Which hazardous materials? Will hazardous materials be stored and/or used next to the Broadcast Center Apartments? Next to the on-site daycare? Will the fueling stations have USTs? How will the fuels be stored? Will the fueling and vehicle maintenance areas have hazardous wastes? Will there be on-site painting of sets? Pyrotechnics stored on-site? Where will they be located? This information is relevant to the assessment of the extent of hazards posed by the Project and is only summarily mentioned in the DEIR. Without additional information, the conclusion that the Project would not exacerbate the risk of upset or accident conditions is unsubstantiated. (DEIR, IV.F-48.)

Response to Comment No. 26-78

Regarding the baseline conditions for the hazards analysis, a detailed discussion of the existing conditions is included on pages IV.F-20 to IV.F-35 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. This section discusses current and historical uses of the Project Site, including the two former gas stations; the findings of the hazardous materials database search; hazardous materials use and storage; hazardous waste generation, handling, and disposal; former USTs; aboveground storage tanks (ASTs); polychlorinated biphenyls (PCBs); asbestos-containing materials; lead-based paint (LBP); methane gas; and subsurface investigations. Refer to revised Figure IV.F-1, Hazards and Hazardous Materials Site Map, in Section III, Revisions, Clarifications and Corrections to the Draft EIR.

Recognizing that hazardous materials generators produce waste in different quantities, USEPA has established three categories of generators in the regulations: very small quantity generators (100 kilograms or less per month), small quantity generators (between 100 to 1,000 kilograms per month), and large quantity generators (1,000 kilograms or more per month). As discussed on page IV.F-48 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Applicant is currently designated as a small quantity generator under Resource Conservation and Recovery Act (RCRA), and the Applicant implements the life cycle provisions of both RCRA and the Hazardous Waste Control Law (HWCL) by maintaining the required inspection logs, manifests, and records, which are subject to review by the Los Angeles County Department of Health Services. In addition, the Applicant currently employs staff members trained in the

appropriate standards for the management of hazardous waste and the clean-up of releases and uses licensed firms for the transport of hazardous waste. The Project would allow for continued operation of the Project Site under these provisions and the required records, training, and licensed transport would continue to be maintained, thus minimizing risks, and adhere to regulatory compliance.

Information on hazardous materials currently stored at the Project Site is provided in the Phase I ESA included in Appendix G of the Draft EIR. These include diesel in ASTs for emergency generators, routine cleaning products, paints, inks, and HVAC chemicals. The routine use of small quantities of potentially hazardous materials typical of studio campuses such as paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations, as discussed on page IV.F-40 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR will continue to be managed in similar quantities in accordance with applicable permits and regulations, such as LAFD California Environmental Reporting System (CERS)/CUPA permitting requirements (i.e., Unified Program Ordinance, Los Angeles County Code Chapter 12.50), under which the Project Site current operates. Similar to existing practices, hazardous materials would not be stored and/or used next to the Broadcast Center Apartments or a potential on-site childcare use. With regard to pyrotechnics, pyrotechnics would only be used inside the sound stages and not outdoors; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Such materials are stored indoors in a locked safe and will continue to be stored in this manner with the Project. Regarding hazardous material related to potentially contaminated soil and groundwater and the location of a potential childcare use, refer to Response to Comment No. 26-E.1-69.

As discussed on pages IV.F-39 to IV.F-40 of the Draft EIR, during Project construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used on-site. While some hazardous materials used during construction could require off-site disposal, such activity would follow all appropriate regulatory protocols and would cease upon completion of Project construction. As such, construction of the Project would involve the short-term use of hazardous materials, and no hazardous waste disposal would occur on-site. All potentially hazardous materials used during construction would be handled and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing associated risks. In addition, as described in Subsection 2.a, Regulatory Framework, in Section IV.F, Hazardous and Hazardous Materials, of the Draft EIR, various regulations (i.e., the Occupational Safety and Health Act [OSHA] Hazardous Waste Operations and Emergency Response [HAZWOPER] standards and Hazardous Materials Transportation Act) establish specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal,

state, and local requirements concerning the transport, use, storage, management, and disposal of hazardous materials.

Regarding Project operation, as discussed on pages IV.F-40 to IV.F-42 of the Draft EIR, similar to the existing conditions within the Project Site, operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used on studio campuses, including paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic special effects, and other general products related to studio operations. Such materials would continue to be stored in appropriate containers, including drums and ASTs, with secondary containment as required. As is currently the Applicant's practice, all hazardous materials would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state, and local requirements (i.e., California Health & Safety Code, Division 20, Chapter 6.5; California Code of Regulations, Division 4.5, Title 22; Unified Program Ordinance, Los Angeles County Code Chapter 12.50; LAMC, Article 7 of Chapter V, Divisions 8, 14). Monitoring of the Applicant's hazardous materials management would be conducted by LAFD and other applicable regulatory authorities, as appropriate. In addition, the Project would be subject to applicable OSHA training and informational requirements, including hazardous materials training for onsite employees who handle or may encounter as a small quantity generator under these provisions and the required records, training, and licensed transport would continue to be maintained, thus minimizing risks.

As is currently the Applicant's practice, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would effectively reduce the potential for Project operations to expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As such, with compliance with existing applicable regulations and requirements, operational activities would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant.

Please note that the Project would not include a fueling station; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 for a detailed discussion regarding recirculation.

Comment No. 26-79

The DEIR also should explain the baseline condition of contamination on the Project Site and surrounding area. The DEIR includes excerpts of information from other reports that mention contamination at various locations on the Project Site over time, but the current condition of site soil, soil gas, and groundwater is not clear. For example, what level of contamination remained after the remediation of the former gas station on the site? Remediation was completed in 2012 and a health risk assessment conducted. Are the conclusions of that assessment consistent with current day standards? Has the health risk assessment been updated? The referenced reports should be appended to the DEIR to allow the public to review the referenced information. The current condition of each media (soil, soil gas, groundwater), the contaminants that could be released during construction and operation and a comparison of the levels of such contaminants compared to current regulatory standards should be described. Where is there existing soil, soil gas and groundwater contamination at the Project Site? At what levels? How do those levels compare with regulatory requirements?

Will the Project construction or use release such contaminant, e.g., soil gas escaping from excavations? At what levels? How will those releases be managed so that they do not impact the adjacent residents and schools? If remediation is required during construction, how will the remediation be completed? What will be the impacts to the immediately adjacent residences and schools?

Response to Comment No. 26-79

The current conditions of the Project Site, including, among other things, residual impacts to soil, soil vapor, and groundwater from the former Texaco station, the cleanup of which was approved by LARWQCB, are presented and discussed in the Site Summary Report, which was included in Appendix G.1 of the Draft EIR. Several soil, groundwater, and soil vapor investigations and remedial activities have been completed at the Project Site to assess potential contamination associated with the former uses and activities on-site, including in anticipation of future development. These have included a Limited Phase II Investigation in October 2018 and Supplemental Phase II Investigations in November 2018, August 2019, and May 2020 (included in Appendix G of the Draft EIR), all of which were performed by Geosyntec, as discussed on pages IV.F-34 to IV.F-35 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR and on pages 5 to 11 in the Site Summary Report. Concentrations of contaminants and comparison to regulatory screening levels are also included in the Site Summary Report; refer to pages 12 to 13 of the Site Summary Report for a summary of the residual concentrations in soil, groundwater, and soil vapor at the Project Site.

As supporting data and documentation for the former Texaco Station Cleanup Case Closure Request to the LARWQCB, the environmental consultant for the station prepared a human health risk assessment in the Soil Vapor Sampling Results and Case Closure Request Report, dated December 5, 2011 (Arcadis, 2011). The site case closure was approved on November 2, 2012 by the LARWQCB under the State of California Low-Threat Underground Storage Tank Case Closure Policy.⁵⁴ The closure review and approval is based on general, groundwater, and vapor intrusion criteria as set forth in the Closure Policy (State Water Board Resolution No. 2012-0062), which continues to be the State's regulatory standard for cleanup of retail fueling stations. Thus, the cleanup criteria and regulatory conclusions in 2012 are expected to be unchanged at this time. Based on a review of the Closure Policy (State Water Board Resolution No. 2012-0062), there is no provision or requirement to perform an updated station-specific HRA following closure approval. The Low-Threat Closure Policy does allow for residual levels of petroleum hydrocarbons in soil, soil vapor and groundwater to remain in place that are deemed a low-threat to human health and the environment. A key rationale for the policy is residual levels of petroleum hydrocarbons that remain in place at the time of closure are known to biodegrade over time under most conditions.

Remediation is not expected to be required during construction. The testing and proper disposal of any soil excavated from the Project Site during construction will follow the sampling, testing and disposal procedures described in the Soil Management Plan (Appendix B of the Site Summary Report included as Appendix G.1 of the Draft EIR).

With respect to the question regarding soil gas escaping from excavations, please see the discussion of SCAQMD Rule 1166 monitoring in Response to Comment No. 26-38.

Comment No. 26-80

It is also unclear if the information in the hazards section is consistent with other analyses in the DEIR. For example, did the potential stormwater quality assessment consider the types of substances present at the Project Site as described in the hazardous sections? The hazards section suggests there is an existing tar collection system on-site. (DEIR, p. IV.F-30.) This does not appear to be discussed in other analyses. How was the presence of tar and ongoing tar removal assessed in geology and soils, cultural resources and water quality? How does the presence of tar affect the operation of the methane mitigation systems? Do the existing historic structures have methane mitigation systems? How will Project development affect the methane mitigation of those structures? Will the existing historic buildings need to be retrofitted with methane mitigation systems? If they

⁵⁴ California Environmental Protection Agency, Underground Storage Tank Low Risk Case Review Form, LUSTIS File No. I-16219, November 2, 2012.

do not have methane systems today and they will not be retrofitted, how will the methane risks be addressed? If they will be retrofitted, how will those retrofits affect the integrity of the buildings? How many emergency generators are on-site today? How many will be on-site in the future? How often are the generators tested? Were the emissions from the testing included in the analysis of air quality and GHGs? Similarly, the DEIR Hazards and Hazardous Materials section should properly evaluate the impacts from helipad use. The DEIR should explain how the existing helipad is used today and how such use will change in the future. How many helicopter take-offs and landings occur at the Project Site under baseline conditions? What are the regulations limiting operations currently? Are there limits on the number of flights? Hours of take-offs and landings? How will the operations change with the Project? Will the change in location change the offsite impacts, such as noise and lighting? Will the frequency of use change? Will the hours of operations change? How were the related impacts analyzed? What regulations will be imposed to ensure operations are consistent with the assumptions analyzed? Will helipad use impact emergency and medical services in proximity to the regional medical center?

Without the foregoing basic information, the conclusions in the DEIR, including for example the conclusions under Threshold (a), Threshold (e), and Threshold (f), are unsubstantiated.

Response to Comment No. 26-80

The information in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR is consistent with the other environmental analysis in Section IV of the Draft EIR. Naturally occurring tar was only encountered in one of the geotechnical borings (Boring B7), below a depth of 60 feet. Boring B7 is located near the southwest corner of the Project Site, away from the historical building onsite, where an existing tar collection system is located. Refer to Response to Comment No. 13-4 regarding the existing tar collection system and disposal requirements for any impacted soil and to Response to Comment No. 26-103 regarding tar as it relates to archaeological resources. Excavation proposed along the southwestern portion of the Project Site is only approximately 7.5 feet in depth, as shown in Figure 3 of the Soil Management Plan (Appendix B of the Site Summary Report included as Appendix G.1 of the Draft EIR). Testing and proper disposal of any excavated soil impacted by naturally occurring oil and/or tar, if encountered, will follow the sampling, testing, and disposal procedures described in Section 5 of the Soil Management Plan. As discussed in Section 6.1.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project would prepare a SWPPP in compliance with the Construction General Permit and would implement Project Site-specific BMPs, including the management of potentially hazardous materials typical of studio campuses.

As discussed in Section 6.2.2 of the Hydrology and Water Quality Report, post-construction stormwater will be managed via BMPs in accordance with the LID Ordinance. Refer also to Response to Comment Nos. 3-4 and 3-7. The treatment from

these LID BMPs, in addition to proper management of potentially hazardous materials typical of studio campuses in accordance with applicable regulations and the proper management of naturally occurring oil and/or tar, would not result in discharges that would cause (1) pollution which would alter the quality of the waters of the State (i.e., the Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes.

Refer to Response to Comment No. 13-6 regarding existing and proposed methane systems. As discussed therein, existing operations onsite include methane detection, alarm, mitigation, and venting systems. The East Studio Building at the Project Site has an existing methane mitigation system comprised of a geomembrane methane barrier and an indoor methane detection system, and other areas are fitted with a system of methane venting risers. The methane gas detected at the Project Site is a result of the naturally occurring upward migration of methane from the petroleum hydrocarbon deposits found in the subsurface. As such, the Project development is not expected to affect the methane migration to existing structures.

It is anticipated compliance with the Methane Code (Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code) will require the installation of a Site Design Level V methane mitigation system (the most protective) for new construction at the Project Site and, if necessary, alternative designs will be provided to the LADBS for review and approval pursuant to the existing Methane Code. Furthermore, for existing buildings located within a methane zone, additions, alterations, repairs, changes of use, or changes of occupancy must comply with the methane mitigation requirements of LAMC Sections 91.7104.1 and 91.7104.2, when required by LAMC Chapter IX, Article 1, Divisions 81 or 82. Methane systems would be designed in accordance with the latest regulatory control measures, including the City of Los Angeles Methane Hazard Mitigation Standard Plans, as required by LADBS. Accordingly, the Project's methane controls would include an impervious membrane, ventilation systems capable of providing a complete change of air, and development and implementation of an operations and maintenance plan, as well as an emergency plan. Installation of a methane mitigation system will have the added benefit of addressing potential vapor intrusion from residual fuel hydrocarbons from the former Texaco station, and naturally occurring hydrogen sulfide. Typically, a Level V methane mitigation system is comprised of active sub-slab gas extraction, impervious membrane, and mechanical ventilation, methane detection and alarm system in the lowest occupied spaces, and paved area venting. A portion of the proposed below-grade parking structures can be assumed to extend below the groundwater table, which would require the approval of an alternate design with the impervious membrane installed with a minimum one percent

slope toward the perimeter of the parking structure in lieu of active subslab gas extraction. While naturally-occurring tar is not expected to be encountered during excavation, if tar is encountered, it will be addressed in accordance with the Soil Management Plan (included in Appendix G.1 of the Draft EIR). Limited tar in soil is not expected to negatively impact the performance of the Level V methane mitigation system. The methane mitigation system will be designed to account for the presence of tar by providing adequate clearance from tar in soils and the lowest component of the methane mitigation system or by incorporating a methane mitigation system design which would not be impacted by the presence of tar (e.g., sloped concrete slab and methane barrier geomembrane in lieu of subslab gas ventilation system).

There are currently six diesel-fueled emergency generators on-site. The diesel fuel is stored in permitted ASTs. Any additional generators will comply with all applicable regulatory requirements. As stated in the Draft EIR, the Project would replace five of the six existing emergency generators (see page IV.E-81 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR). Air quality, energy, and GHG impacts associated with emergency generators, including emissions from the testing of emergency generators, were fully evaluated in the Draft EIR. Section IV.A, Air Quality, of the Draft EIR analyzed air quality impacts related to stationary source emissions during routine maintenance and testing of emergency generators. Refer to Table IV.A-7 and Table IV.A-10 on pages IV.A-64 and IV.A-70, respectively, of the Draft EIR for the estimated maximum emissions from emergency generators during operation of the Project. As stated on page IV.C-17 in Section IV.C, Energy, of the Draft EIR, the six existing diesel generators on the Project Site use approximately 8,759 gallons of diesel per year for routine testing and maintenance, which occurs twice a month for maintenance. As stated on page IV.C-29 of the Draft EIR, the Project would also include several emergency generators, which would be used on a temporary basis during construction and are not expected to provide long-term power generation. However, the generators require periodic testing, which would consume diesel fuel. As shown in Table IV.C-2 on page IV.C-27 of the Draft EIR, diesel fuel usage would be approximately 4,594 gallons per year related to testing and maintenance of the on-site emergency generators. Regarding greenhouse gas emissions, as shown in Table IV.E-11 on page IV.E-78 of the Draft EIR, the Project is expected to result in one MTCO_{2e} per year from stationary sources (i.e., emergency generators).

Refer to Response to Comment No. 26-15 regarding the on-site helipad, which was properly analyzed as part of the Draft EIR and would continue to operate as part of the Project consistent with existing conditions in accordance with established permits (ZA Case No. 11412) and regulatory requirements.

Comment No. 26-81**The Construction Assumptions Have Major Gaps**

The DEIR's construction assumptions have numerous gaps that result in unaccounted impacts. First, construction impact determinations on pages IV.F-42 and 47 has virtually no information of what, where, and how much hazardous materials and wastes are used, disposed, and transported. The Project Site is an operating studio that appears to have substantial usage of hazardous materials. The management of such materials during construction is not adequately disclosed. The DEIR says that all appropriate regulatory protocols would be followed—which protocols? This information should be included for public review.

The DEIR states that the construction of the Project would involve “short-term use” of hazardous materials. (DEIR, p. IV.F-39.) But the Project construction could occur for 20 years. The DEIR fails to analyze whether long-term buildout to 2043 would have the potential for greater impacts. For example, would impacts be greater because of an increase in the on-site population? Longer construction would mean that part of the Project would be operational before construction is completed. How will potential impacts to employees and visitors from the potential release of hazardous substances during construction be managed?

Response to Comment No. 26-81

As noted in this comment, the Project is currently an operating studio. See Response to Comment No. 26-78 for a discussion of current and anticipated use of hazardous materials in connection with studio operations.

The Project's potential impacts related to the risk of upset and accident conditions and the release of hazardous materials are evaluated on pages IV.F-42 to IV.F-55 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As discussed therein, with regulatory compliance and implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, construction and operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with handling or use of hazardous materials or with hazardous waste generation, handling, and off-site disposal during construction and operation would be less than significant with mitigation.

As discussed in Section 6.1.2 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR), the Project would prepare a SWPPP in compliance with the Construction General Permit and would implement Project Site-specific BMPs, including the management of hazardous materials during construction.

With regard to the 20-year buildout as it relates to construction, refer to Response to Comment No. 9-24. As stated on pages IV.F-58 to IV.F-59 of the Draft EIR, while Project buildout is anticipated in 2026, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the proposed Specific Plan and the Mitigation Monitoring Program throughout the term of the Development Agreement. The proposed Specific Plan and the Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable PDFs and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. The Draft EIR discussion of the use, handling, disposal of hazardous materials and/or hazardous waste applies to the full buildout, without regard to the construction timeline. Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

Comment No. 26-82

Also, on page IV.F-58 for Threshold (f), there is insufficient information provided regarding lane closures and other disruptions during construction. What are the existing emergency access and disaster routes in the Project area? How will access to those routes be maintained? What is the emergency evacuation plans for the Project Site? Has consideration been given to how the adjacent residents would be evacuated if emergency conditions at the Project Site could impact the immediately adjacent multi-story apartment building? The public, area hospitals, and first responders can be impacted by disruptions to emergency and disaster routes and general circulation. What are the elements of the Construction Management Plan and related emergency evacuation plans? The DEIR assumes that there would be limited off-site construction activities within adjacent streets that would require temporary lane closures. (DEIR, p. IV.F-58.) How was the nature and extent of off-site construction determined? What is the off-site construction? Where and when would it occur? The DEIR also states that **operation** of the Project would generate traffic that would result in limited **temporary** modifications to Project Site Access (DEIR, p. IV.F-58.) How can operational traffic impacts be considered temporary? These impacts need to be assessed as long-term impacts and adequately disclosed in the DEIR. What are they? And how does the long-term nature of the impacts change the conclusion of Threshold (f)? How is adequate circulation and emergency access determined?

Given the immediately adjacent uses, such as the Broadcast Center Apartments, Etz Jacob Congregation synagogue, the post office, Pan Pacific Park, The Grove, and Farmers Market, the Construction Management Plan should reflect the input from these neighbors; including providing advance schedule of construction activities to these neighbors; identifying one managerial level point of contact for immediate response to construction concerns; prohibiting construction vehicles or lane closures on The Grove Drive/Stamley

Avenue; prohibiting sidewalk closures on frontage of the Broadcast Center Apartments, the Etz Jacob Congregation synagogue and Torah Center, the post office, Pan Pacific Park, the Grove and the Farmers Market; prohibiting street and sidewalk closures and roadwork on the immediately surrounding streets during the Jewish holy days or from November–January 15th; restricting continuous concrete pours to days and times and months of the year that do not adversely impact the surrounding uses, and requiring construction workers to park on-site.

Response to Comment No. 26-82

The Construction Traffic Management Plan, which is Project Design Feature TR-PDF-1 on page IV.K-36 of the Draft EIR, will include street closure information, a detour plan, haul routes, and a staging plan that will be reviewed and approved by City staff. The Construction Traffic Management Plan would include temporary traffic controls during all construction activities adjacent to public rights-of-way on public roadways to provide for the safe passage for all modes of travel during construction. The Construction Traffic Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. In addition, a work site traffic control plan identifying the location of all temporary roadway lane and/or sidewalk closures will include designated detour routes, including for pedestrians, to the extent necessary to ensure safe circulation. Specific road closure information would be identified and planned for once construction plans for individual buildings are prepared and approved by the City. Potential temporary lane closures on streets around the Project Site would typically be related to utility work, traffic signal work, or road work (such as the proposed widening of The Grove Drive adjacent to the Project Site). Except in extreme circumstances, two-way access is maintained on streets at all times during this type of work. These types of closures are routine throughout the City and do not constitute unusual hazards or significant impacts to the environment. The nature and extent of off-site work is based on the proposed development program described in Section II, Project Description, of the Draft EIR and technical input from various City departments with oversight of development projects, including, among others, LADOT, LADWP, Fire, Police, Public Works, and Planning, as noted in the Draft EIR.

Los Angeles County maintains a map of disaster routes which are pre-identified freeways or arterial streets for use during times of crisis to bring in emergency personnel, equipment, and supplies to impacted areas. They receive priority for clearing, repairing, and restoration over other roads. Beverly Boulevard is on the map of Disaster Routes. However, as noted above, the temporary and limited off-site work that would be needed for the Project would generally only require temporary lane closures and two-way access would be maintained at all times. Any such work would require approval and permitting in accordance with City requirements as well as the requirements of the Construction Traffic

Management Plan, and adequate detour routes—if warranted—would be prepared as part of those requirements.

The statement on page IV.F-58 in the Draft EIR that “[o]peration of the Project would generate traffic in the Project vicinity and would result in limited temporary modifications to Project Site access, primarily in expanding the number of access points” is true of any development project that adds vehicle trips and site access points. By adding access points to the Project Site, the current and future Project vehicles will be redistributed to utilize all available access driveways which will cause a short-term shift in the current traffic patterns. The transportation analysis in the Draft EIR takes the location of the new driveways into account by distributing Project vehicles to the proposed locations of the new driveways. Thus, the Draft EIR already takes into account the long-term effects of the new access locations. The question of the adequacy of the access and circulation systems is answered in Table 18 on pages 162 and 163 in the Transportation Assessment (Appendix M.1 of the Draft EIR) which shows that the four main driveways to the Project Site will all operate at LOS B or C during both the morning and afternoon peak hours of the day upon full buildout of the Project. See Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for a discussion of emergency access for the Project Site.

Phased construction, which could be spread over a longer period of time than single phase construction, would not result in a greater potential impact to implementation of an adopted emergency response plan. The type of work that may require temporary lane closures would not have an extended duration as a result of Project phasing. Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35, 26-147, 35-134, and 35-150 regarding emergency response times and how the Project would provide adequate emergency access.

The comment requests that the Construction Traffic Management Plan incorporate a variety of features that are already identified as part of Project Design Feature TR-PDF-2. These include designation of a construction manager as a liaison with the surrounding community, advance notification of adjacent property owners and occupants of upcoming construction activities and hours, and prohibition of construction worker or equipment parking on adjacent streets or in residential areas. The Draft EIR concluded that impacts related to transportation and emergency access would be less than significant during construction; thus, the additional measures requested in this comment are not required under CEQA.

Comment No. 26-83

The DEIR refers to an export of 60,000 cy of hazardous soil during construction. How was that figure calculated? Was it based on the conceptual plan? Could that amount be greater? If the volume of hazardous soil could be greater, how would the impacts differ? If

the volume of hazardous soil could not be greater, why not—on what facts is that based? Given the residences and schools in the area surrounding the Project Site, the DEIR should also disclose the appropriate regulatory protocols referenced for off-site disposal.

Response to Comment No. 26-83

The Soil Management Plan (Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]), on page 40 of the PDF file, presents an analysis that compares subsurface soil testing data with the grading and excavation plan (Figure 3), which is based on the proposed development program described on pages II-12 to II-35 of Section II, Project Description, of the Draft EIR. The areas and depths of planned grading and excavation and the estimated lateral and vertical extent of residual soil impacts above acceptable regulatory standards are presented in the Soil Management Plan (Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]). Based on soil testing data, the estimated lateral extent and depth of individual impacted areas (area times depth to calculate volume) were summed and used to estimate the total volume of contaminated soil above permissible regulatory standards that are anticipated to be encountered and exported during redevelopment activities. That analysis estimates approximately 60,000 cubic yards of excavated soil could be classified as “hazardous” based on regulatory standards and the estimated distribution of soil concentration levels. “Hazardous” in this context simply means that the soil is not “clean fill” and must be disposed of at a properly licensed disposal facility. The soil quantity estimate is based on the maximum extent and concentration of chemicals detected in soil at the Project Site; therefore, it is unlikely that the volume of impacted soil encountered would be greater than estimated. The Draft EIR identified the preferred disposal facility—Buttonwillow Landfill in Kern County. Future additional soil characterization will be conducted during the City’s regulatory building permit process to confirm the estimate in the Soil Management Plan. The impacts will not change; excavated soil that is determined to be “hazardous” will be disposed of properly and in accordance with all applicable regulatory requirements. Any excavated soil determined to be “hazardous” will be disposed of offsite and will not be disposed of or relocated onsite. As discussed in the Soil Management Plan, sampling and analytical results shall be used for proper characterization of the soil for offsite disposal. Based on the results of the analysis, the General Contractor or designated subcontractor shall select and utilize an appropriate facility licensed to accept such soil. Concentrations exceeding the applicable regulatory screening levels shall be the basis for development of appropriate worker protection, handling, and disposition of the suspect soil.

Comment No. 26-84

Finally, the Project would likely lead to removal of existing solar panels during Project construction. Are the existing panels going to be reused on-site or disposed? The DEIR does not disclose what would happen to existing solar panels, and the potential impacts of

potential solar panel waste disposal. The DEIR should address how the Project will dispose of photovoltaic cells.⁴

⁴ See a recent Los Angeles Times article revealing that the cells cannot be recycled and contain harmful chemicals. <https://www.latimes.com/business/story/2022-07-14/california-rooftop-solar-pv-panels-recycling-danger>.

Response to Comment No. 26-84

As stated on page IV.F-39 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project would be in full compliance with all applicable federal, state, and local regulatory requirements concerning the transport, use, storage, management, and disposal of hazardous materials. The existing solar panels will be removed as part of the Project. Any construction waste, including the solar panels and photovoltaic cells, will be disposed of in accordance with applicable regulatory requirements (California Code of Regulations, Title 22, Section 66273.32). With respect to privately-owned solar panels, certain components may be recyclable, such as metal frames, glass, and copper. Any components that cannot be recycled will be handled in accordance with applicable regulatory requirements; if the panels meet the definition of “universal waste,” as defined in California Code of Regulations, Title 22, Division 4.5, Chapter 23, as amended, they will be recycled. Otherwise, the panels will be properly disposed of as hazardous waste. Leased solar equipment will be returned to the lessor.

Comment No. 26-85

Impacts to Sensitive Receptors Were Not Adequately Analyzed

The DEIR does not adequately account for all impacts to sensitive receptors, resulting in incorrect impact analysis. For instance, the impact analysis in Threshold 9(c) [sic] says that the Project is not expected to involve hazardous emissions or handle acutely hazardous materials, substances, or waste. On what basis does the DEIR make that conclusion? Earlier the hazards section describes a range of hazardous materials usage and contamination. Will that usage and contamination not involve hazardous emissions? What does the DEIR mean by “acutely hazardous”? Is there no usage or presence of “acutely hazardous substances” on the Project Site?

It also is unclear how compliance with regulations reduce risk to nearby schools to less than significant for Threshold (c), when the schools are subject to the risks to the general public acknowledged in Threshold (d). If the “Project may create a significant hazard to the public or the environment caused in whole or in part from the Project’s exacerbation of existing environmental conditions” (DEIR IV.F-56), then why would it not impact existing or proposed schools within one-quarter mile? It is also unclear whether the DEIR considered all known and proposed schools. The DEIR discussion distinguishes between the distance

to religious and LAUSD schools. Why make that distinction? Did the impact analysis consider both the same? Was the existing religious school directly across from the Project Site considered in the impact analyses? The Project uses also include education uses. Were those considered in the evaluation of Threshold (c)?

The DEIR also should clarify whether, from a hazards exposure and health risk standpoint, the below grade production zone was evaluated as occupied space or parking. These uses would have different emissions profiles and, therefore, depending on how the spaces will be used, would have different impacts.

Response to Comment No. 26-85

As discussed on pages IV.F-55 and IV.F-56 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, Ohel Chana High School (which is located directly across from the Project Site) and Morasha Hebrew Academy are located on Beverly Boulevard approximately 0.1 mile and 0.2 mile east of the Project Site, respectively. The nearest Los Angeles Unified School District (LAUSD) schools, Hancock Park Elementary and Fairfax Senior High School, are located just over 0.25 mile to the south and north, respectively.

The Draft EIR considered both public and private schools equally; these were listed separately for organizational purposes—not because they were analyzed differently. Regarding consideration given to future schools, among the 68 related projects in the vicinity of the Project Site, the only related project that involves a school is a private school located at 9120 Olympic Boulevard, approximately 2.9 miles southwest of the Project Site, as shown on page III-13 of Section III, Environmental Setting, of the Draft EIR. This distance is beyond the 0.25-mile radius considered under Threshold (c).

As discussed in the Initial Study prepared for the Project, provided in Appendix A of the Draft EIR, the Project is not expected to involve hazardous emissions or handle acutely hazardous materials, substances, or waste. “Acutely hazardous” means severely hazardous. Although the Project would involve the use of hazardous materials common to urban construction projects and studio operations, as discussed above, all activities involving the handling, use, storage, transport, and disposal of hazardous materials and wastes would occur in compliance with applicable federal, state, and local regulatory requirements. This already occurs under existing conditions and would not change with the Project. As such, with compliance with applicable regulations and requirements, the Project would not create a significant hazard to nearby schools or other sensitive receptors. Therefore, impacts regarding potential emissions or the handling of hazardous materials and wastes within 0.25 miles of an existing school would be less than significant.

Additionally, as discussed on page IV.F-57 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the discussion provided under Thresholds (a) and (b) in Subsection 3.d of Section IV.F details the various conditions present on-site that could pose a hazard to the public or the environment. Based on the analysis in the Site Summary Report (Appendix G.1 of the Draft EIR), regulatory compliance and appropriate mitigation—specifically the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1—would address residual constituents associated with the former Texaco station release and other residual soil conditions, and impacts would be reduced to a less-than-significant level. With appropriate regulatory protocols and management of impacted soil per Mitigation Measure HAZ-MM-1, as well as related Mitigation Measure HAZ-MM-2, designed to mitigate the effects of subsurface gases and impacted soil and groundwater on workers and the public, the Project would not create a significant hazard to the public or the environment or exacerbate existing environmental conditions. Therefore, impacts with respect to this threshold would be less than significant with mitigation, as concluded in the Draft EIR. Schools within 0.25 mile are part of “the public” and were, therefore, included in the Draft EIR’s analysis with regard to this threshold.

Lastly, the Project would not include educational uses. As stated in Topical Response No. 3, Permitted On-Site Uses, Section III, Revisions, Clarifications, and Corrections to the Draft EIR, includes clarifications to Section II, Project Description, of the Draft EIR to provide a clarified list of five permitted studio related uses within the Project Site consistent with the underlying purpose of the Project: sound stage; production support; production office; general office; and retail. The Project would also continue to allow for ancillary sitewide uses, such as parking, communication facilities, childcare, and facilities equipment and infrastructure, supporting the studio and the five permitted land uses.

With regard to the below-grade uses, such uses would include parking areas, basecamp uses, and the Mobility Hub (which would be partially open to the sky). No active production activities would occur in the parking or basecamp areas below Project Grade. Refer to Response to Comment No. 26-28 for the analysis of emissions associated with these uses.

Comment No. 26-86

The DEIR Does Not Include all Feasible Mitigation Measures

The Project also did not consider all feasible mitigation measures despite potentially significant impacts, especially to the adjacent residences and schools and nearby public park. For instance, given the proximity of sensitive users and known historic contamination near such uses, perimeter air monitoring should be conducted throughout Project grading activities. The Project should also commit to placing stockpiles away from offsite areas and

limiting them in size. These are feasible mitigation measures that would lessen the risk to the public, especially immediately adjacent sensitive receptors.

Please also note a potential oversight in Mitigation Measure Haz-MM-2. [sic] It is unclear how “soil and groundwater exposure during excavation shall be minimized to reduce the surface area which could off-gas”. [sic] How will this be achieved when large areas of the site are being graded? What is the extent of excavation that can be exposed while off-gassing is minimized? What does it mean for the off-gas to be minimized? What amount of off-gassing is acceptable? How is that determined? How will this measure be implemented differently for a 3-year construction versus a 20-year construction schedule? Has the composition of the off-gassing been adequately assessed?

Also, the DEIR does not clarify whether the Health and Safety Plan mentioned in Mitigation Measure HAZ-MM-1 factors in exposure to immediately adjacent residences and on-site operational personnel or just on-site construction personnel. If just on-site construction personnel, how will the health and safety of these other populations be addressed? Should the SMP consider and address potential impacts to all on-site and offsite populations that could be exposed to site conditions through the emission of contaminated gases and soils?

Response to Comment No. 26-86

As discussed in Subsection 3 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project would result in temporary potentially significant impacts during construction with respect to Threshold (b) (whether the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment) and Threshold (d) (whether the project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment) under Appendix G of the CEQA Guidelines.

With respect to Threshold (b), as discussed on pages IV.F-42 to IV.F-44 of the Draft EIR, construction of the Project may exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with hazardous waste generation, handling, and disposal during construction would be potentially significant. As such, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 (included on pages IV.F-50 to IV.F-54 of the Draft EIR) are proposed, as discussed below. As discussed on pages IV.F-46 to IV.F-47 of the Draft EIR, the Project may exacerbate the risk of upset and accident conditions associated with methane gas, and impacts associated with methane gas and hydrogen sulfide during construction would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-2 is proposed, as discussed below.

As discussed on pages IV.F-54 to IV.F-53 of the Draft EIR, with regard to potential soil contamination, any residual concentrations of contaminants, including specific areas with TPH impacts and one location with elevated arsenic or of naturally occurring tar (which, as discussed in Response to Comment No. 26-80 is unlikely) would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan (included in Appendix G.1 of the Draft EIR) set forth in Mitigation Measure HAZ-MM-1 also would require appropriate management during excavation and grading operations. Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control. Thus, the size of excavation areas and stockpiles will be determined based on the protocols described in the Soil Management Plan (e.g., soil sampling and analysis) to minimize the release of volatile organic compounds (VOCs) (referred to as "off-gas" in this comment). In addition, during excavation of soils containing VOCs, the contractor would be required to comply with SCAQMD Rule 1166 requirements and control measures. Such control measures include segregating VOC-contaminated stockpiles from non-VOC contaminated stockpiles; spraying contaminated stockpiles with water or vapor suppressants; and covering stockpiles with plastic sheeting for periods of inactivity.

In the event that VOC-contaminated soils are encountered during construction or construction occurs in areas of known or potential contamination, appropriate handling, off-site disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil), if necessary. SCAQMD Rule 1166 requires that a permit be obtained from and a mitigation plan be approved by SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored VOCs; the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil (i.e., soil which registers 50 ppm or greater using an organic vapor analyzer calibrated with hexane) at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be maintained on-site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes, and VOC concentration readings would be recorded. Compliance with existing regulations and implementation of Mitigation Measure HAZ-MM-1 would be the same for a 32-month construction schedule or a 20-year construction schedule and would ensure the Project would not create or exacerbate a significant hazard to the public, including nearby residences, schools and public park, or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of VOC-contaminated soil that may be encountered on-site. Additionally, refer to Response to Comment No. 26-87 regarding stockpiling of soils.

VOC emissions from excavation of potentially contaminated soils and groundwater were specifically taken into account (see Appendix C.2, Geosyntec, TAC Emissions Related to Excavation of Potentially Contaminated Soils and Groundwater Dewatering Activities) in the quantitative HRA (Appendix FEIR-10 of this Final EIR) that was prepared in response to comments on the Draft EIR. As discussed in Response to Comment No. 26-E.1-2, the HRA confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds, and impacts would be less than significant.

With regard to methane, Mitigation Measure HAZ-MM-2 requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public. These measures would include monitoring devices for methane and benzene to alert workers of elevated gas concentrations, contingency procedures if elevated gas concentrations are detected, worker training to identify exposure symptoms and implement alarm response actions, and the minimization of soil and groundwater during excavations. Additionally, soil and groundwater removed as part of construction would be sampled and tested for off-site disposal in a timely manner and if soil is stockpiled prior to disposal, it would be managed in accordance with the Project's SWPPP. Furthermore, fencing would be erected to limit public access and allow for gas dilution. Lastly, a HASP would be prepared to describe the proposed construction activities and hazards associated with each activity. As such, implementation of Mitigation Measure HAZ-MM-2 would ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater would be less than significant. Therefore, with regulatory compliance and the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, impacts associated with hazardous waste generation, handling, and disposal during construction and operation would be less than significant with mitigation. Lastly, Mitigation Measure HAZ-MM-2 applies to the entire duration of construction regardless of length.

With respect to Threshold (d), as discussed on pages IV.F-56 to IV.F-57 of the Draft EIR, Government Code Section 65962.5 requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese) List, which is a list of hazardous waste sites and other contaminated sites. While the Cortese List is no longer maintained as a single list, several databases provide information that meet the Cortese List requirements, including the LUST database. As discussed above, as a result of the release at the former Texaco station, the remediation of which was approved by LARWQRB, the Project Site is listed on the HIST CORTESE database. The discussion provided under Thresholds (a) and (b) above in Subsection 3.d of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR details the various conditions present on-site that may pose a hazard to the public or the environment. Although no current violations and no active regulatory cases were identified for the Project Site, based on the analysis in Subsection 3.d, the Project may create a significant hazard to the public or the environment

caused in whole or in part from the Project's exacerbation of existing environmental conditions. The discussion provided in Subsection 3.d details the various conditions present on-site that may pose a hazard to the public or the environment. Therefore, impacts with respect to this threshold would be potentially significant. Based on the analysis in the Site Summary Report, regulatory compliance and appropriate mitigation—specifically the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1—would address residual constituents associated with the former Texaco station release, and impacts would be reduced to a less-than-significant level. With appropriate protocols and management of impacted soil per Mitigation Measure HAZ-MM-1, as well as related Mitigation Measure HAZ-MM-2, designed to mitigate any potential effects of subsurface gases and impacted soil and groundwater on workers and the public, the Project would not create a significant hazard to the public or the environment or exacerbate existing environmental conditions. Therefore, impacts with respect to this threshold would be less than significant with mitigation. Thus, Project-level impacts related to the Project Site's inclusion on a list of hazardous materials sites were determined to be less than significant with implementation of regulatory requirements and Mitigation Measures HAZ-MM-1 and HAZ-MM-2.

Under CEQA, mitigation measures are only imposed to reduce significant environmental impacts. CEQA Guidelines Section 15126.4 states that “[a]n EIR shall describe feasible measures which could minimize significant adverse impacts,” and “[m]itigation measures are not required for effects which are not found to be significant” (CEQA Guidelines Section 15126.4(a)(1), (3)). As discussed above, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are feasible and would reduce the potentially significant hazards impacts during construction to a less than significant level.

Comment No. 26-87

Soil Management Plan was Not Described in Adequate Detail

Mitigation Measure HAZ-MM-1 requires the Project to implement a Soil Management Plan (“SMP”) which will be submitted to the City of Los Angeles Department of Building and Safety (“LADBS”) for review and approval prior to the commencement of excavation and grading activities. However, many critical details concerning the SMP are missing.

First, the qualifications of individuals involved in the SMP process should be disclosed. The SMP and mitigation measure does not mention what qualifications or certifications will be required of the general contractor and subcontractors implementing the SMP. It appears that the SMP proposes that the contractor and subcontractor have primary responsibility for visual and olfactory screening for potentially impacted soil. What qualifications will the contractor and subcontractor be required to have to make such critical assessments? Is visual and olfactory observation sufficient for the types of contamination

anticipated? Will they also screen with a photoionization detector or similar instrument? Who will be responsible for that screening and what are their qualifications? The SMP indicates that a Rule 1166 permit may be obtained if VOCs are encountered. There is known VOC contamination at the Project Site. Shouldn't the Rule 1166 permit be obtained before commencing soil disturbance? At a minimum, the DEIR should require an appropriately certified environmental consultant on-site to observe all earthwork and daily reports be prepared and available for review.

Second, it is unknown how the SMP will address the likelihood of encountering soil that is stained or having odors considering the Project's location in an area characterized by oil field conditions (e.g., tar, petroleum hydrocarbons, hydrogen sulfide). It is likely that the contractors will continuously encounter stained and odorous soils. Will construction be halted continuously? What will this do to the construction schedule? Where will suspect material be stockpiled? It should not be stockpiled at the perimeters of the site where residents, school children, and pedestrians could be exposed to the materials. HAZ MM-1 [sic] suggest that known areas of contamination could be excavated prior to commencing Project excavation and grading. Will this be a required condition of approval? How will those areas be determined? Will additional sampling be conducted prior to excavation and grading? Will the remaining soils after excavation (bottom and sidewalls of excavations) be sampled to ensure there is not remaining contamination above regulatory levels? Also, what will be the criteria for reuse of excavated on-site soils? The DEIR should be revised and the SMP should include a clear and thorough discussion of how to handle soil that is stained or has odors given the known conditions at the Project Site.

Third, the DEIR states that LADBS will review and approve the SMP at some future date. Is LADBS the appropriate agency to review the SMP? What expertise does LADBS have to review an SMP? Has LADBS agreed to provide the oversight of the SMP?

Fourth, the DEIR assumes that VOCs in groundwater are from offsite sources. How and on what basis did the DEIR determine that the sources were offsite? Given historic industrial operations at the Project Site, there is a possibility that VOCs can be from on-site sources. For example, couldn't the soil and groundwater proximate to drains located in paint shops or vehicle servicing areas be impacted by on-site operations? Potential on-site sources should be adequately investigated and the management of any impacted media addressed in the SMP. Finally, the Mitigation Measure states that the SMP should be updated to reflect changes in site conditions or regulatory/legal criteria. If the SMP is modified in the future, will such modification be subject to approval? By whom?

Response to Comment No. 26-87

The Project Site has been thoroughly investigated, as described in the Site Summary Report (Appendix G.1 of the Draft EIR), and this investigation informed the Soil

Management Plan (Appendix B of the Site Summary Report). Additional investigation of the Project Site is not planned or required by applicable legal requirements and it is unlikely that the contractors will continuously encounter stained and odorous soils. Per Mitigation Measure HAZ-MM-1, the Applicant must implement the Soil Management Plan attached as Appendix B of the Site Summary Report (Appendix G.1 of the Draft EIR), which must be submitted to LADBS for review and approval prior to the commencement of excavation and grading activities. The Soil Management Plan provides a detailed description of the procedures required for soil testing, handling and proper disposal during the earthwork, grading, excavation, or other soil disturbance activities during Project construction. The Soil Management Plan was prepared by a hazardous substances expert in addition to Professional Geologists licensed in the State of California and will be implemented by a General Contractor and subcontractor(s) licensed to work in the State of California under the direct supervision of a State-licensed professional such as a Professional Engineer or Professional Geologist. The licensed professional is required to ensure the Soil Management Plan is implemented by field personnel qualified and trained on the field procedures and monitoring instruments. A photoionization detector (PID) is a standard field screening instrument that will be used during the excavation process in compliance with Rule 1166. Daily field reports of observations and monitoring will be prepared and will be available for review by the City. Pursuant to the Soil Management Plan, any soil that is disturbed, excavated, or trenched due to on-site construction activities must be handled in accordance with local, state, and/or federal regulations; therefore, the qualifications of the General Contractor and its subcontractor(s) will meet the requirements of the local, state, and/or federal regulations. No soil disturbance or excavation activities would occur without a Project Site-specific HASP in accordance with California Code of Regulations, Title 8, Section 5192. The HASP will identify equipment to be used for protecting worker safety. The Soil Management Plan is intended to provide proper control and management of soils at the Project Site that are known or found to be impacted by chemicals of concern and to provide risk management measures that are designed to be protective of potentially exposed populations. Special precautions will be taken to manage soil in areas containing chemicals of concern above screening levels. These areas include the former Texaco station and other select areas of the Project Site with elevated TPH and arsenic in shallow soil. Soil in these areas of Project development with residual contaminant above screening levels will either be excavated and properly disposed of off-site prior to commencing Project Site-wide excavation and grading operations or segregated during construction. To the extent that it is not practical or possible to live-load these soils for off-site disposal due to interruptions in the availability of trucking from weather or traffic, they will be stockpiled on-site in a location away from sensitive receptors prior to off-site disposal.

Refer to Response to Comment Nos. 26-38 and 26-86 regarding the Project's compliance with Rule 1166. Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored VOCs; the excavation or

grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil (i.e., soil which registers 50 ppm or greater using an organic vapor analyzer calibrated with hexane) at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be maintained onsite during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes, and VOC concentration readings would be recorded. Undisturbed soil is not included in the scope and jurisdiction of Rule 1166. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit will be the responsibility of the General Contractor.

Odors potentially produced by excavation activities, such as for hydrogen sulfide, will be monitored and controlled pursuant to SCAQMD Rule 402, Nuisance, and an odor monitoring plan.⁵⁵

Regarding the commenters' VOC-related comments, the Site Summary Report (Appendix G.1 of the Draft EIR) describes in detail the subsurface investigations of soil, soil vapor and groundwater performed at the Project Site. As discussed in the Site Summary Report, these investigations have detected generally non-detect levels of chlorinated VOCs, such as PCE, TCE, and cis-1,2-DCE, with low-concentration and sporadic detections which are likely due to remnants of offsite, upgradient releases from historical dry cleaners to the north along Beverly Boulevard (refer to the Phase I ESA included in Appendix G of the Draft EIR and Figure 2 of the Site Summary Report). As discussed in Response to Comment Nos. 13-4, 13-6, and 16-28, residual low levels of petroleum hydrocarbons (including some aromatic VOCs) have been detected in the northeast portion of the Project Site in the location of the former Texaco station. Further, naturally occurring tar has been detected in an isolated location in the southwest corner of the Project Site. With the exception of the previously described residual petroleum hydrocarbon release from the former Texaco station, subsurface investigations have identified no other onsite sources of VOCs. The Project Site conditions have been adequately characterized in the Draft EIR, and this characterization informs the likelihood of encountering impacted materials during the Project, which would then be handled pursuant to the Soil Management Plan.

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 with regard to potential encounters with soil contamination. As discussed therein, any residual concentrations

⁵⁵ SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1. Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control. For example, as stated on page IV.F-51 of Section IV.F, Hazards and Hazardous Materials, in Mitigation Measure HAZ-MM-1, if the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the property owner's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by the property owner prior to the beginning of work. The Suspect Soil must be managed and handled in accordance with Sections 5.3.1 to 5.3.3 of the Soil Management Plan.

It is anticipated that all soil will be immediately loaded onto trucks for disposal and, thus, stockpiling on-site would not be necessary. In certain situations, however, soil may need to be temporarily stored on-site. In these situations, the stockpiled soil would be stored on the Project Site interior away from public interfaces on the perimeter. Mitigation Measure HAZ-MM-1 has been revised to reflect this commitment. See Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The impacts to the construction schedule are reflective of the amount of unsuitable soil that may be discovered. Preliminary studies indicate potential schedule impacts to be minimal. The Soil Management Plan will be submitted to the Grading Division of LABDS for review and approval as part of the Grading Permit plan check's review and approval of the Soil Management Plan. LABDS is the designated permitting organization for the Project and thus is the appropriate agency to review and approve the Soil Management Plan. LAFD is designated as the enforcement agency for the City that regulates hazardous materials and thus LABDS may designate LAFD or other regulatory agencies to review the Soil Management Plan. As described in the Site Summary Report, onsite sources of contamination have been adequately investigated and addressed. Should an update to the Soil Management Plan be deemed necessary, it would be submitted to LABDS or its designee.

Regarding the comments related to Mitigation Measure HAZ-MM-1 and excavation, the Site Summary Report (Appendix G.1 of the Draft EIR) presents the results of extensive subsurface investigations and sampling performed to date. The Soil Management Plan (Appendix B to Appendix G.1 of the Draft EIR) estimates the location and quantity of soils that may be encountered during excavation that may exceed regulatory standards and require offsite disposal at designated disposal facilities. No additional subsurface soil sampling is required by the City or CEQA. The excavation bottoms and sidewalls are not required to be sampled and tested (this would be required for an underground storage tank

soil remediation project, which the Project is not), and no such sampling or testing is planned. Existing contamination, to the extent it exists, may remain in place outside the limits of the excavations.

On-site soils with no evidence of chemical impacts, either through visual observations or field screening, may be considered for reuse on-site. Soil re-use is discussed in Section 5.3.3 of the Soil Management Plan. As stated therein, excavated soil that is suspect, either due to visual inspection or field screening measurements, may not be re-used at the Project Site until it is sampled and chemically analyzed. A California Department of Health Services certified testing laboratory shall be contracted to perform testing of suspect soil intended for on-site re-use. Excavated soil should be re-used on-site to the extent it is safe, practicable, and in accordance with applicable regulatory regulations.

Comment No. 26-88

Dewatering and Groundwater Extraction Impacts to Hazards Were Not Adequately Addressed

The extent of existing groundwater contamination and the source of such contamination is not well documented in the DEIR. The DEIR appears to assume that contaminated groundwater emanates from an offsite source without explanation or support. What is the evidence supporting the DEIR's conclusion given the prior releases of hazardous substances which occurred onsite?

Response to Comment No. 26-88

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, 16-85, and 26-78 regarding the Draft EIR's discussion of soil and groundwater contamination, including among other things, the extent and source of contamination, under existing conditions and the proposed Project. As explained therein, some of the contamination comes from on-site sources (e.g., low levels of PAHs and aromatic VOCs from the former Texaco station), whereas other contamination likely comes from off-site sources (e.g., chlorinated VOCs from off-site properties), as fully and adequately explained in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. For a detailed description of the impacts to groundwater and their source, see the Site Summary Report (Appendix G.1 of the Draft EIR).

Comment No. 26-89

It also is unclear from the DEIR how dewatering will change the rate and direction of groundwater contamination.

Response to Comment No. 26-89

Please see Response to Comment Nos. 11-25 and 26-69 as well as the Dewatering Report in Appendix FEIR-13 of this Final EIR, for a discussion of historical groundwater levels and flow directions at the Project Site. Also, see Figures 8A and 8B in the Dewatering Report that depict the estimated temporary groundwater level cone of depression during dewatering for excavation Area 2. In general, the flow directions are directed toward the excavation center by the concentric temporary cone of depression. The temporary groundwater pumping will induce localized steeper gradients and increased groundwater flow rates toward the excavations being dewatered. Based on a review of the State databases for environmental cleanup sites (i.e., Geotracker and Envirostor), at this time there are no active environmental remediation cases at the Project Site, within 1,000 feet of the Project Site boundary, or within the estimated temporary construction dewatering cones of depression. A number of former cleanup cases located on Beverly Boulevard and Fairfax Avenue have been completed and closed by regulatory authorities. Thus, while isolated and/or residual low-level detections of contaminants may be detected in groundwater, there is no evidence of a defined offsite contaminant plume that would be affected by temporary dewatering during Project construction.

Comment No. 26-90

Will dewatering draw contamination toward the site or offsite sensitive receptors such as the school across Beverly or the Broadcast Center Apartments? How was that determined?

Response to Comment No. 26-90

The temporary dewatering during Project construction is not anticipated to draw contamination toward the Project Site or off-site sensitive receptors; refer to Response to Comment No. 26-89.

Comment No. 26-91

Was the potential for off-gassing from such groundwater contamination during construction and operation evaluated? Were the potential impacts of such off-gassing on on-site and offsite populations assessed?

Response to Comment No. 26-91

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 16-85 regarding the potential to encounter groundwater contaminants and to Response to Comment No. 26-86 for an analysis of risk from contaminants in groundwater and off gassing potential.

Comment No. 26-92

According to DEIR IV.F-34, there are multiple sites with historical and active groundwater monitoring and remediation programs focused on cleanups of VOCs and petroleum hydrocarbons. How will dewatering affect those plumes?

Response to Comment No. 26-92

Refer to Response to Comment Nos. 11-25 and 26-69 regarding the estimated temporary construction dewatering cones of depression and to Response to Comment No. 16-85 regarding the potential to encounter groundwater contaminants.

Comment No. 26-93

The analysis by Shannon & Wilson suggests that the dewatering could draw contamination from a broad area to the Project Site and neighboring sensitive receptors. The DEIR should further analyze these potential impacts.

Response to Comment No. 26-93

Refer to Response to Comment Nos. 26-E.3-3 through 26-E.3-10 regarding temporary dewatering. The commenter's analysis overestimates the vertical and lateral extent of the anticipated dewatering cones of depression for a number of reasons, including, but not limited to: (1) the analysis does not consider regulatory lateral migration infiltration control measures that will be incorporated if necessary; (b) a time-variable dewatering program of 21 months was not used; and (3) Project Site-specific material properties that each combine to reduce the anticipated dewatering quantities and cone of depression dimensions. The projected cone of depression lateral dimensions are not estimated to extend to active environmental cleanup sites. The commenters' analysis relies upon unrealistic assumptions (unrestrained dewatering), lacks supporting calculation details and references (silty sand and undefined high storage coefficient), and uses a simplified, non-representative analytical solution (i.e., assumes isotropic water bearing materials), that combine to overestimate the anticipated dewatering conditions. Refer also to Response to Comment Nos. 11-25 and 26-69 regarding the estimated temporary construction dewatering cones of depression.

Because the Project includes excavation below the water table, temporary construction dewatering will be required. As discussed in Response to Comment No. 11-5, temporary construction dewatering impacts were analyzed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As stated on page IV.F-44 of the Draft EIR, during construction-phase dewatering, any discharge of groundwater would comply with the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such regulatory requirements, the extracted groundwater would be chemically

analyzed to determine whether the groundwater is contaminated and the appropriate treatment and/or disposal methods, if any. Thus, with compliance with applicable regulations and requirements, Project construction activities would not create or exacerbate a significant hazard to the public or the environment involving the handling and disposal of extracted groundwater, and impacts would be less than significant.

Appendix FEIR-13 of this Final EIR presents the methods and findings of a Dewatering Report for temporary construction dewatering, which was prepared in response to comments and confirms the Draft EIR's conclusions that impacts related to dewatering would be less than significant.

As discussed therein, the completion of the underground parking structure construction (i.e., at the end of the 21-month dewatering period), the model estimated drawdown of approximately 10 feet extending up to approximately 125 feet from the Area 2 excavation perimeter and approximately 4 feet of drawdown at a distance of up to approximately 300 feet from the Area 2 excavation perimeter. Notably, as described in Section 2.4.4 of the Dewatering Report included in Appendix FEIR-13 of this Final EIR, naturally occurring annual groundwater fluctuations often range between 0.5 and 2 feet, and long-term groundwater fluctuations in the Project Site vicinity have been found to be in the range of 3 to 6.5 feet in the Project Site vicinity. Furthermore, it is common to have groundwater elevation fluctuations in the range estimated in the Dewatering Report from a variety of regulatory-approved activities, including other construction excavation dewatering projects, groundwater remediation systems, industrial supply wells, and stormwater infiltration systems. The Dewatering Report concludes that the temporary dewatering would have a less-than-significant impact on neighboring properties and regional water resource needs

As the dewatering will be limited to temporary dewatering during construction, and the proposed construction will eliminate the need for permanent dewatering (see Response to Comment No. 3-7), the post-construction groundwater conditions at the Project Site are expected to return to general pre-construction conditions.

Refer to Response to Comment No. 16-85 regarding the Draft EIR's groundwater analysis.

Comment No. 26-94

Please also note that page IV.F-20 of the DEIR states that the groundwater report detected water at 7 feet bgs. However, the balance of the DEIR assumes 8 feet based on a "historic high." This should be updated to 7 feet based on the report. Any impacts associated with the difference should be disclosed.

Response to Comment No. 26-94

In response to comments on the Draft EIR, a dewatering simulation and analysis was prepared for informational purposes; refer to the Dewatering Report (Appendix FEIR-13 of this Final EIR). As stated in the Draft EIR, the historic high groundwater level for the Project Site is approximately eight feet below grade (please note that, as discussed in the Draft EIR, although individual well water level gauging measurements of less than 8 feet below ground surface (bgs) have been recorded historically in isolated locations, they are not representative of the current overall water table levels for the Project Site). Groundwater levels vary over time, and the groundwater level measurements in monitoring wells and investigation borings vary due to a variety of factors. In preparing the Dewatering Report, Geosyntec conducted a confirmatory evaluation of groundwater levels for the Project Site using historical data as well as the most current data in order to interpolate individual well and boring water level measurement data into average estimated water table surfaces per time period. Based on more recent data from 2002 to 2023, the approximate 10 feet bgs mean water level measurement was determined to be the appropriate existing condition for the dewatering simulations presented in the Dewatering Report, as this is the most representative estimate of the Project Site's groundwater level. It is Geosyntec's professional opinion that the 2-foot difference between 8 feet bgs (historic high water table depth) and 10 feet bgs (average water table depth based on extensive historic and current data) within an average 60-foot-thick aquifer saturated interval simulation would result in only incremental differences in dewatering quantities and cone of depression dimensions and would not change any of the less than significant conclusions in the Dewatering Report or the subsidence appendix provided by Geotechnologies (Appendix D of the Dewatering Report).

Comment No. 26-95**The DEIR Does Not Adequately Analyze Methane and Hydrocarbon Impacts**

The DEIR mentions that the Project Site is within a designated methane zone mapped by the City, which also has naturally occurring hydrogen sulfide. However, it is not clear if the methane-related and hydrogen sulfide Project impacts have been adequately analyzed.

For example, will additional development have impacts on the migration of methane and hydrogen sulfide to the existing buildings on and offsite? As noted above, the DEIR does not disclose whether existing buildings that will remain have methane systems, and if not, whether they will be retrofitted. It is also possible methane may act as a carrier and increase the potential for VOC migration.

Response to Comment No. 26-95

Refer to Response to Comment No. 13-6 regarding existing and proposed methane systems. The existing buildings to remain currently have methane systems. Naturally occurring hydrogen sulfide was not detected in any of the 26 soil vapor samples collected during the Phase II Site Investigation included as Appendix G.2 of the Draft EIR. Installation of methane mitigation systems have the added benefit of addressing potential vapor intrusion from residual fuel hydrocarbons from the former Texaco station, and naturally occurring hydrogen sulfide. No technical studies have been identified that conclude methane gas can serve as a carrier gas for VOC gases.

Comment No. 26-96

What is the potential for the methane mitigation systems to vent other gases? Which gases and to what extent? Where will these vents be located?

Response to Comment No. 26-96

It is possible that vents associated with a methane mitigation system might vent other gases. However, system monitoring and sensors, as required by the Methane Code (Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code) and LADBS permit review, will establish safe levels of operation and appropriate locations. Refer to Response to Comment No. 13-6 regarding existing and proposed methane systems.

Comment No. 26-97

Will they be near the Broadcast Center Apartments? The DEIR should elaborate on these potential impacts.

Response to Comment No. 26-97

At this time, the methane system designs have not been developed. Methane mitigation system design will be developed and finalized during the future design review process for individual Project buildings with LADBS and LAFD as part of the regulatory building permit process, at which time the final approved PDFs will be available for integration of the methane mitigation system. However, during the future design review process with LADBS and LAFD, potential vent locations will be evaluated for proper locations to meet health and safety standards. The Methane Code (Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code) includes requirements for setback distances for vent riser terminations from window and door openings, roof openings, air intakes, and property lines. Refer to Response to Comment No. 13-6 regarding existing and proposed methane systems.

Comment No. 26-98

The DEIR does not mention whether the methane system will be permitted by the South Coast Air Quality Management District (SCAQMD).

Response to Comment No. 26-98

Methane emissions from naturally occurring sources or methane mitigation systems are not regulated by the SCAQMD. As the Project proceeds, the SCAQMD will be consulted regarding potential methane system permitting, along with all applicable local jurisdictions, as described in Response to Comment No. 13-6.

Comment No. 26-99

The DEIR notes that the methane system will be venting other constituents such as fuel hydrocarbons and hydrogen sulfide. What are the risks associated with the vented methane, hydrogen sulfide, and other substances for the sensitive receptors? How will the emissions be controlled?

Response to Comment No. 26-99

Methane is a naturally occurring gas found in the subsurface within the City of Los Angeles Methane Zone. As such, outside the buildings and structures, the naturally occurring methane will continue to escape and dissipate at the surface at the regular, natural rate. The methane control systems are designed to monitor and control methane levels in buildings and structures. The future methane control system designs will be subject to review and approval by LADBS. It is presumed that a design Level V methane mitigation system will be appropriate for any new construction at the Project Site as required by the LADBS and the City of Los Angeles Methane Code (Division 71 of Article 1, Chapter IX of the LAMC). Systems will be designed in accordance with the latest regulatory control measures, including the City of Los Angeles Methane Hazard Mitigation Standard Plans as required by LADBS. Other potential gases detected at the Project Site may also be controlled by these systems depending upon the final approved design. Refer also to Response to Comment No. 13-6.

Comment No. 26-100

The DEIR does not mention whether control devices will be included and whether applicable regulatory (SCAQMD) requirements will be followed.

Response to Comment No. 26-100

Refer to Response to Comment Nos. 13-6 and 26-98. The future methane control system designs for individual buildings will be subject to review and approval by LADBS during the regulatory building permit process. It is presumed that a design Level V methane mitigation system will be appropriate for any new construction at the Project Site as required by the LADBS and the City of Los Angeles Methane Code (Division 71 of Article 1, Chapter IX of the LAMC). Systems will be designed in accordance with the latest regulatory control measures, including the City of Los Angeles Methane Hazard Mitigation Standard Plans as required by LADBS.

Comment No. 26-101

What regulations apply and how will the Project comply? It is also unclear whether this impact has been factored into Project emissions and underscores the need for a proper HRA. Were the emissions from the methane systems included in the air quality and GHG analyses? Please explain how.

Response to Comment No. 26-101

As discussed in Response to Comment No. 26-99, methane is a naturally occurring gas found in the subsurface within the City of Los Angeles Methane Zone. As such, outside the buildings and structures, the naturally occurring methane will continue to escape and dissipate at the surface at the regular, natural rate. Therefore, the methane systems would not result in new sources of emissions. Please refer to Response to Comment No. 13-6 for information regarding methane mitigation system requirements for the Project. The proposed systems would not result in air pollutant emissions. However, slab foundation buildings (e.g., sound stages) may require ventilation systems (i.e., small electric mechanical fans) as part of the methane mitigation systems. This additional electricity usage and related GHG emissions are included in the Confirmatory Air Quality, GHG, and Energy Impacts Analysis in Response to Public Comments included in Appendix FEIR-9 of this Final EIR.

Comment No. 26-102

How exactly will the Project comply with the City's methane mitigation requirements? What effect does the existing hydrostatic pressure documented at the Project Site per the DEIR have on the methane mitigation systems? How will that be addressed in the methane system design?

Response to Comment No. 26-102

The future methane control system design will be subject to review and approval by LADBS. Based on the Project being located within the Los Angeles Methane Zone, it is anticipated that a Site Design Level V methane mitigation system will be implemented for any new construction at the Project Site as required by the LADBS and the City of Los Angeles Methane Code (Division 71 of Article 1, Chapter IX of the LAMC). Systems will be designed in accordance with the latest regulatory control measures, including the City of Los Angeles Methane Hazard Mitigation Standard Plans as required by LADBS.

The methane control system design for on-grade structures will not be influenced by hydrostatic pressures, and the methane control system design for the below-grade parking structures will account for the effects of hydrostatic pressure. Per Project Design Feature GEO-PDF-1, which is included on pages IV.D-18 to IV.D-19 in Section IV.D, Geology and Soils, of the Draft EIR, the below-grade parking structures will be designed to withstand hydrostatic pressures, which will minimize the potential impact of hydrostatic pressures on the below grade components of the methane control system for below-grade structures.

Comment No. 26-103

Also, the DEIR does not analyze how the presence of tar impacts a methane mitigation system. How does the tar removal work? Is there a potential that the tar could clog the methane mitigation systems increasing the risk of unmitigated methane hazards at the site? How does the dewatering system work with the tar collection? Are other potential impacts of tar removal considered; for example, what are the effects on archaeological and paleontological resources? Will tar removal increase with the Project? Where will the tar removal systems be located? Are there any differences in the potential impacts from the tar removal based on location? Have any such differences been considered?

Response to Comment No. 26-103

Refer to Response to Comment Nos. 13-6 and 26-80 regarding the presence of methane and the proposed Project's methane mitigation system. The methane mitigation system will be designed to seal off any potential tar containing zones to prevent system clogging.

Refer to Response to Comment Nos. 13-4, 16-64, and 26-80 regarding naturally occurring tar. Following extensive subsurface investigations, including soil logging and sampling in 21 geotechnical borings and 39 environmental borings located throughout the Project Site, tar was noted in only a single interval (60-70 feet bgs) in one boring (B7). Boring B7 is located adjacent to the tar sump in the southwest corner of the Project Site and the interval in which tar was detected is well below the base of proposed excavations.

Thus, tar was noted only in an isolated area near the southwest boundary of the Project Site where a tar collection pit is located and currently collected and disposed of according to applicable regulations on a regular basis when passively filled. Given the extensive distribution of soil borings in which tar was not encountered, it is not expected that any tar will be encountered during construction nor is construction expected to encounter tar seeps or increase tar removal rates. Nevertheless, as discussed in Response to Comment No. 13-4, testing and proper disposal of any excavated soil impacted by naturally occurring oil and/or tar will follow the sampling, testing, and disposal procedures described in Section 5 of the Soil Management Plan (Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]) pursuant to Mitigation Measure HAZ-MM-1.

As discussed in Response to Comment No. 11-5, any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements, including any required treatment prior to discharge, and, therefore, groundwater quality would not be negatively affected by potential dewatering activities.

With regard to archaeological resources, Mitigation Measure CUL-MM-1 would be implemented during soil excavation, ensuring that any impacts to archaeological resources at that time would be mitigated to a less than significant level. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities. Furthermore, the ongoing passive collection of tar on-site, which is not anticipated to increase due to the Project, does not impact archaeological resources, as it does not involve ground disturbance.

Regarding impacts to paleontological resources, Mitigation Measure GEO-MM-1 would be implemented during soil excavation, ensuring that any impacts to paleontological resources at that time would be mitigated to a less than significant level. Refer to Response to Comment No. 35-91 regarding revisions to Mitigation Measure GEO-MM-1. Furthermore, the ongoing passive collection of tar on-site, which is not anticipated to increase due to the Project, would not impact paleontological resources, as it does not involve ground disturbance.

Comment No. 26-104

Do the cumulative air quality and GHG analyses factor in the methane mitigation systems? HAZ-MM-2 is described as protocols for construction. How would HAZ-MM-2 reduce the recognized potentially significant impacts of the “risk of upset and accident conditions associated with methane gas during operation, and impacts associated with methane gas and hydrogen sulfide” as stated at DEIR IV.F-50?

Response to Comment No. 26-104

Emissions from the methane mitigation system will be required to comply with applicable SCAQMD regulatory requirements. Refer to Response to Comment Nos. 13-6, 26-80 and 26-86 regarding the presence of hydrogen sulfide. With regard to Mitigation Measure HAZ-MM-2, which requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public, this measure is not applicable to the analysis on page IV.F-50 of the Draft EIR regarding risks due to methane during operation. Please refer to Response to Comment No. 26-101 regarding air quality and GHG emissions associated with the methane mitigation systems.

Comment No. 26-105**The DEIR Does Not Adequately Analyze Historical Oil and Gas Operations**

The Project Site is identified on several Underground Storage Tank (“UST”) databases related to the former USTs associated with past CBS operations. The UST closures occurred 31 years ago. Do the UST closures meet current regulatory standards? Was residual contamination left in place at the time of the closure? Do remaining contamination levels meet current regulatory screening or remedial action levels?

On Page IV.F-25, prior Notice of Violations for poor storage and handling practices regarding waste streams are mentioned. However, these were not considered Recognized Environmental Conditions. Why not? How will the future operations prevent such poor handling practices?

In addition, page IV.F-46 of the DEIR states that no oil or gas production wells or derricks have been identified on-site. What sources were reviewed to make this determination? Because the Project Site was within the Salt Lake Oil Fields and the La Brea Oil Fields, oil and gas operations were significant in the area. If undocumented wells are encountered during excavation and grading, what steps will the Project take to properly assess and close the wells?

Also, given the oil production in the area, does the DEIR consider the potential for subsidence from cumulative water, oil, and gas withdrawal in the area?

Finally, the DEIR should clarify why the Limited Phase II Environmental Site Assessment (“ESA”) described in page IV.F-34 assumes Total Petroleum Hydrocarbon (“TPH”) detections are from naturally occurring petroleum when there were USTs previously on-site.

Response to Comment No. 26-105

Refer to Response to Comment No. 13-6 regarding the former USTs identified on-site.

Page IV.F-25 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR states that the studio generated waste streams onsite in the past and the facility received several violation notices from applicable state agencies over the years, due mainly to storage, handling, and administrative violations related to these wastes. These violation notices described in the Draft EIR and the Phase I ESA (included in Appendix G of the Draft EIR) were related to operational issues that were not reported to have resulted in any releases of hazardous materials. With regard to future use of hazardous materials onsite, as discussed on page IV.F-40 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, as is currently the Applicant's practice, all hazardous materials would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state, and local requirements, and are not considered Recognized Environmental Conditions. Monitoring of the Applicant's hazardous materials management would be conducted by LAFD and other applicable regulatory authorities, as appropriate. In addition, the Project would be subject to applicable federal and state OSHA training and informational requirements, including hazardous materials training for onsite employees who handle such materials.

As discussed in Response to Comment Nos. 13-4 and 13-6, despite the Project Site's location within the Salt Lake Oil Fields and La Brea Oil Field and the historic operation of oil wells in the surrounding area, no former oil or gas production wells or oil derricks have been identified within the Project Site. This was confirmed by historical research, such as topographic maps, aerial photographs, and records from the CalGEM well finder database, as discussed on page 4 of the Site Summary Report (Appendix G.1 of the Draft EIR) and page IV.F-22 of the Draft EIR. Former oil wells identified as "plugged" or "idle" were located in the developed area outside of the Project Site. Further, the Project does not include the installation of new oil wells. Accordingly, the Draft EIR concluded that the Project would not exacerbate the risk of upset and accident conditions associated with oil wells, and impacts associated with oil wells would be less than significant (see page IV.F-46 of the Draft EIR). While it is considered very unlikely, the discovery of an unknown oil well during construction would be addressed through an oil well abandonment following existing State of California Well Plug and Abandonment procedures under CalGEM. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project would comply with all applicable regulatory requirements, including LAMC Section 91.7109.2, which requires LAFD notification when an abandoned oil well is encountered during construction activities and requires that any abandoned oil well not in compliance with existing regulations be re-abandoned in accordance with applicable rules and regulations of CalGEM (see page IV.F-18 of the Draft EIR).

As stated on page IV.D-14 in Section IV.D, Geology and Soils, of the Draft EIR and discussed in Response to Comment Nos. 11-5, 11-25, and 16-74, no permanent large-scale extraction of groundwater, gas, oil, or geothermal energy currently occurs or is planned at the Project Site. Therefore, the potential for ground subsidence due to the withdrawal of fluid or gas at the Project Site is low. This was confirmed by the Dewatering Report and subsidence appendix (Appendix D of the Dewatering Report) that was prepared in response to comments on the Draft EIR; refer to Appendix FEIR-13 of this Final EIR. The comment misconstrues the Draft EIR, which states that certain detections of petroleum hydrocarbons, specifically GROs, are likely from either naturally-occurring oil and gas; the Draft EIR and Site Summary Report clearly document petroleum impacts from anthropogenic sources in addition to naturally occurring sources. In either case, the cleanup levels and approaches are governed by State of California regulations as described in the Soil Management Plan (Appendix B of the Site Summary Report). Refer also to Response to Comment Nos. 13-4, 13-6, and 16-28.

Comment No. 26-106

Missing Documents

Some documents referenced in the DEIR were not included in the appendices. Were these documents available to the City? How did the DEIR base its analysis on documents not publicly available? The DEIR should include the following documents mentioned throughout the DEIR for public review and comment:

- Consolidated Contingency Plan
- Television Studios Emergency Action Plan
- Television Studios Injury and Illness Prevention Plan
- Various referenced reports that “were prepared for the property independently of the Project and are on file at the Department of City Planning”
- Referenced “existing” health and safety plans

Response to Comment No. 26-106

The Consolidated Contingency Plan, Television Studios Emergency Action Plan, and Television Studios Injury and Illness Prevention Plan will be updated as set forth in Project Design Features HAZ-PDF-1, HAZ-PDF-2, and HAZ-PDF-4. While the existing plans were not included in the Draft EIR, the updated plans were described on pages IV.F-38 and IV.F-39 of the Draft EIR. As stated therein, under Project Design Feature HAZ-PDF-1, the Applicant will update, and the Project will comply with, the Consolidated Contingency Plan for the Project Site. This will include spill prevention measures such the

use of secondary containment storage and storing materials away from drains in leak-proof containers with tight-fitting lids. Spill response measures will include the evacuation of unnecessary employees from a spill area, the use of absorbent materials in the case of small spills or evacuating all employees, calling 911, and reporting to LAFD in the case of large spills. Absorbent materials used to clean small spills will be placed in a leak-proof container that is compatible with the waste, labeled as hazardous waste, and lawfully disposed of as such. Notifications will be made to the Health Hazardous Waste Materials Division of the LAFD and the California Office of Emergency Services (Cal OES) as necessary. Under Project Design Feature HAZ-PDF-2, the Applicant will update, and the Project will comply with, the Television Studios Emergency Action Plan and associated emergency exit and assembly maps. The Emergency Action Plan will include procedures for earthquakes, emergency evacuation, fires, medical emergencies, and active shooters. Under Project Design Feature HAZ-PDF-4, the Applicant will update, and the Project will comply with, the Television Studios Injury and Illness Prevention Program (IIPP). The IIPP will include protocols regarding responsibility, compliance, employee communication, hazard assessment, accident/exposure investigation, hazard correction, training and construction, and recordkeeping. These PDFs will be included in the Mitigation Monitoring Program for the Project, which will ensure their completion. With regard to the “[v]arious referenced reports that ‘were prepared for the property independently of the Project and are on file at the Department of City Planning’” as stated by the commenter, this phrase is from a footnote in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR in reference to the Phase II Investigations prepared for the Project Site, which are on file with the City. With regard to the “[r]eferenced ‘existing’ health and safety plans” as stated by the commenter, the Safety Manual for the Project Site is on file with the City.

Comment No. 26-107

Wind Impacts Were Not Analyzed

The DEIR does not address the potential wind impacts from the Project. Tall buildings, especially those over 100 feet, and exposed structures can strongly affect the wind environment for pedestrians and surrounding uses. Structure designs that present projecting tall flat surfaces square to strong winds can create ground-level winds that can be hazardous to pedestrians. Despite proposing buildings as tall as 225 feet, there is no analysis of whether the Project will create hazardous wind conditions at the ground level. The DEIR also does not evaluate the possible wind effect on the balconies of the adjacent Broadcast Center apartments due to Project buildings which could be 160 feet tall. The DEIR should be revised to analyze the Project’s potential wind impacts to on- and off-site public spaces and off-site private spaces.

Response to Comment No. 26-107

CEQA does not require a discussion of wind impacts in Appendix G of the CEQA Guidelines, and the *L.A. CEQA Thresholds Guide* does not contain any standards that would apply to the evaluation of wind impacts. Reported case law (e.g., *Mission Bay Alliance v. Office of Community Inv. & Infrastructure* (2016) 6 Cal.App.5th 160, 197) further confirms that CEQA does not require analysis of wind impacts. Therefore, a wind analysis was not required or conducted for the Project. The commenter does not provide any authority that a wind impact analysis is required by CEQA or any technical support for the claim that the Project could cause wind impacts or that there is a hazardous wind condition at ground level.

Comment No. 26-108**Air Hazards Were Not Properly Analyzed**

The DEIR does not address multiple potential significant impacts to air navigation from the construction and operation of the Project and also fails to analyze corresponding mitigation measures.

As the DEIR fails to address multiple potential negative impacts to safe air navigation resulting from the construction and operation of the proposed Project, the mitigation measures presented in the DEIR cannot be properly analyzed.

The publicly available “Notice Criteria Tool” on the Federal Aviation Administration’s website indicates that the Project “is in proximity to a navigation facility and may impact the assurance of navigation signal reception.” (See image below) Further, the Notice Criteria Tool indicates that any Project Site structure exceeding 200 feet would require filing the Project with the FAA and would require the FAA to undertake an air hazards analysis prior to construction. The DEIR makes no reference to these requirements despite the Project including uses above 200 feet. The Project Applicant must undertake a study to understand the impacts to the “assurance of navigation signal reception” for the entire Project Site and also understand the potential physical hazard impacts to air travel for the Project’s tallest buildings and cranes. These air hazards are compounded by the fact that the Project will have a helipad and helicopters may be flying in and out of the Project Site at all times of day and night (no limitations on the helipad use are provided in the DEIR).

Latitude:	<input type="text" value="34"/>	Deg	<input type="text" value="04"/>	M	<input type="text" value="26.4"/>	S	<input type="text" value="N"/>
Longitude:	<input type="text" value="118"/>	Deg	<input type="text" value="21"/>	M	<input type="text" value="35.4"/>	S	<input type="text" value="W"/>
Horizontal Datum:	<input type="text" value="NAD83"/>						
Site Elevation (SE):	<input type="text" value="201"/> (nearest foot)						
Structure Height:	<input type="text" value="225"/> (nearest foot)						
Traverseway:	<input type="text" value="No Traverseway"/>						
<small>(Additional height is added to certain structures under 77.9(c)) User can increase the default height adjustment for Traverseway, Private Roadway and Waterway</small>							
Is structure on airport:	<input checked="" type="radio"/> No <input type="radio"/> Yes						
<input type="button" value="Submit"/>							

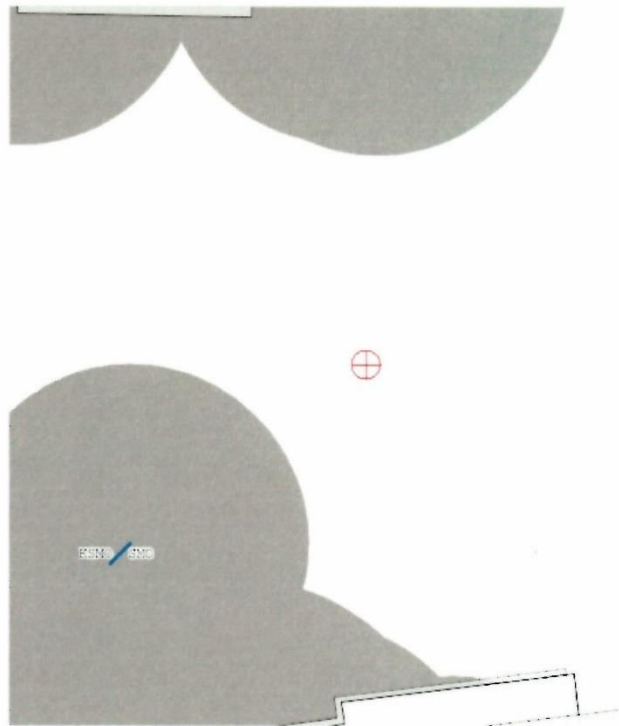
Results

You exceed the following Notice Criteria:

Your proposed structure is in proximity to a navigation facility and may impact the assurance of navigation signal reception. The FAA, in accordance with 77.9, requests that you file:

77.9(a) by 25 ft.

The FAA requests that you file:

**Response to Comment No. 26-108**

The Draft EIR fully addresses impacts associated with safe air navigation as required by CEQA. As discussed on page 58 of the Initial Study included as Appendix A of the Draft EIR:

The Project Site is not located within two miles of an airport or within an airport planning area. The nearest airport is the Santa Monica Airport located approximately 8.4 miles southwest of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a

safety hazard or excessive noise. Therefore, no impact would occur, and no mitigation measures are required.

With regard to FAA requirements for buildings over 200 feet, as stated by the Commenter, FAA review of Project buildings taller than 200 feet would be necessary prior to construction. More specifically, this review would occur during the pre-construction permitting process and not as part of the Project's environmental review process. This review would include submittal of Form 7460-1 (14 CFR Part 77, Notice of Proposed Construction or Alteration) to the FAA. The Project would comply with performance standards, which could include but is not limited to appropriate markings and lighting, that may be required by FAA as part of the 7460-review process.

Also refer to Response to Comment No. 26-15 regarding the on-site helipad that would continue to operate consistent with existing conditions in accordance with established permits (ZA Case No. 11412) and regulatory requirements.

Comment No. 26-109

The DEIR Does Not Discuss the Risk of Cranes Collapsing

The DEIR does not discuss the potential for a crane collapse on the site or any measures that will mitigate a crane collapse on the site or the hazards associated with the presence of a crane adjacent to public areas. Recently, a 300-foot tall crane collapsed at the SoFi Stadium construction site. (CBS Los Angeles, Crane Collapses At Under-Construction SoFi Stadium In Inglewood, available at: <https://www.cbsnews.com/losangeles/news/2-cranes-collapse-sofi-stadium-inglewood/>.) The DEIR should be updated to analyze the risk of a crane failure and the mitigation measures needed to address this risk. The mitigation measures should also include limitations on crane placement, swing (i.e., the arc the boom travels), and when cranes can be erected or dismantled.

Response to Comment No. 26-109

As would be required by any construction project of this scale and complexity, a crane safety plan, meeting all applicable local and State safety guidelines, including but not limited to Cal-OSHA Article 15 and Article 29 Section 1710, will be put in place prior to the start of construction. Such plans are the obligation of the general contractor.

Comment No. 26-110

The DEIR Does Not Discuss Pyrotechnics

The DEIR states that pyrotechnics will be permitted through regulatory requirements. However, the DEIR does not discuss the potential for pyrotechnics being stored and used

at the Project Site. What is the plan for the proper storage and handling of these dangerous materials? The DEIR should be revised to discuss the plan for the safe handling of pyrotechnics so the public can be assured that the City and the Project Applicant are properly prepared. Where will the pyrotechnics be used? In open to the sky production areas? How will the use of pyrotechnics affect the adjacent residents?

Response to Comment No. 26-110

The use of pyrotechnics for special effects would only occur within interior areas of sound stage buildings at the Project Site and would occur in accordance with all applicable regulatory requirements consistent with existing conditions. This includes having at least one licensed pyrotechnician on stage, with approval from the City Fire Marshal, and utilization of fire detection and suppression methods, including set design features such as the use of specific fabrics like “Smoke Out” that is designed to disintegrate when water from the sprinklers make contact. Pyrotechnics would not be used in areas of the Project Site open to the sky. Additionally, pyrotechnic materials are and would continue to be stored in a locked safe. Therefore, the use of pyrotechnics would not affect adjacent residents.

Comment No. 26-111

G. Hydrology and Water Quality

The DEIR concludes that the Project’s impacts on hydrology and water quality will be less than significant based on an incomplete evaluation of the Project and hypothetical data.

The DEIR notes that under the City’s LID Ordinance, the first tier for addressing stormwater is infiltration. However, the DEIR goes on to state that the Geotechnical Investigation concludes that infiltration is not possible, in part due to the depth of the potential subterranean parking level. How was this determination made when there are no set Project development plans? If there is no requirement for subterranean development, then the DEIR should not assume below grade construction and should explain whether an infiltration system would be otherwise feasible.

Is subterranean parking required? What is that requirement? Where will it be built? When? What will be the required parking? How is that determined? What will be the phasing of the parking?

The DEIR anticipates that on-site runoff may contain nutrients, pesticides, metals, oil, and grease. (DEIR, p. IV.G-19.) How was that determined? Were the range of hazardous substances discussed in the Hazards and Hazardous Materials section (DEIR IV.F) considered when evaluating which hazards are currently or in the future could be picked up

in stormwater? Without an accurate description of existing and potential pollutants, the conclusions regarding impacts to the stormwater system are unsubstantiated.

The DEIR states that “the Project Site contributes minimally to groundwater recharge. Therefore, the existing Project Site does not substantially contribute to groundwater pollution or otherwise adversely impact groundwater quality.” (DEIR IV.G-22). However, recharge is not the only way that the Project Site could impact groundwater. The Project Site has a range of existing and proposed uses of hazardous materials. Groundwater levels at the site are shallow (reportedly ~eight feet below ground surface). Thus, hazardous substances in surface and subsurface features have the potential to impact groundwater. The DEIR acknowledges that USTs have greater potential to impact groundwater, but does not recognize other surface and subsurface features. What other existing and proposed uses at the Project Site could release hazardous substances to groundwater? The on-site potential to impact groundwater should be fully evaluated and disclosed in the DEIR.

Response to Comment No. 26-111

As discussed in Response to Comment No. 26-55, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to pages II-12 to II-35 therein), and any substantial changes from the Project would be subject to further discretionary City review and potential subsequent CEQA compliance review, per the proposed Specific Plan. As stated on page II-1 in Section II, Project Description, of the Draft EIR and throughout the Draft EIR, the Project would include excavations up to a maximum of approximately 45 feet below grade, which is based on the proposed development program described on pages II-12 to II-35 of Section II, Project Description, of the Draft EIR. Contrary to the commenter’s assertion, the Draft EIR fully analyzed the Project’s potential impacts related to hydrology and water quality in Subsection 3.d in Section IV.G, Hydrology and Water Quality, of the Draft EIR, and concluded that impacts would be less than significant. This comment does not provide any evidence that the Draft EIR’s analysis is based on an incomplete evaluation of the Project and hypothetical data.

Refer to Response to Comment Nos. 3-4 and 3-7 regarding hydrology and water quality. The Project has considered the hydrogeology of the Project Site, and stormwater management was specifically addressed in Section IV.G, Hydrology and Water Quality, of the Draft EIR. The City’s LID Ordinance No. 181,899 (updated September 2015 with Ordinance No. 183,833) provides for a number of alternatives for stormwater management. As discussed on page IV.G-30 of the Draft EIR, based on the Preliminary Geotechnical Engineering Investigation prepared for the Project (and included as Appendix E.1 of the Draft EIR), infiltration is not feasible due to multiple factors, including the expansive and relatively impermeable nature of the underlying soils and the historic groundwater level of 8 feet bgs encountered at the Project Site. LADBS requires the bottom of the infiltration

system to be a minimum of 10 feet above the groundwater level. As discussed in Section 6.2.1 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR), the Project Site is currently approximately 90 percent impervious and is expected to remain approximately 90 percent impervious post-construction. The next tier in the LID Manual after infiltration is a stormwater capture and use system. Therefore, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff from the Project Site, the Project would include the installation of a capture and reuse system to be used for irrigation. If that approach is later determined to be infeasible, high efficiency biofiltration/bioretenion systems, consistent with the LID requirements, would be installed. In either case, BMP systems will be designed within the property to capture the typical urban contaminants found in stormwater. As the current stormwater is discharged without any such controls, the BMPs installed as part of the Project will be an improvement over the current conditions.

As discussed in Section II, Project Description, of the Draft EIR, excavation for below-grade parking would extend to a maximum depth of 45 feet below grade. Accordingly, temporary construction dewatering would be required; regarding dewatering, refer to Response to Comment No. 3-7. The excavation areas are shown in Figure 3 of the Soil Management Plan, which is included in Appendix G.1 of the Draft EIR.

Regarding parking, refer to Topical Response No. 13, Parking.

As stated on pages IV.G-40 to IV.G-41 in Section IV.G, Hydrology and Water Quality, of the Draft EIR, potential pollutants in stormwater resulting from the Project would be those typical of studio land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. The discussion of runoff and the potential presence of nutrients and pesticides, among other things, was a discussion of the general condition of urban stormwater runoff, and not specific to this Project or Project Site. Additionally, as stated on page IV.G-41 of the Draft EIR and discussed in Response to Comment Nos. 3-4 and 3-7, the Project will comply with the LID requirements with respect to stormwater management. The implementation of BMPs required by the City's LID Ordinance would target these pollutants to minimize pollutant loads in stormwater runoff. Implementation of LID BMPs as part of the Project would result in improved surface water runoff quality as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. Accordingly, as determined in the Initial Study, with compliance with existing applicable regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan, and impacts would be less than significant.

As discussed in Section 6.1.2 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR), the Project would prepare a SWPPP in compliance with the Construction General Permit and would implement Project Site-specific BMPs, including the management of potentially hazardous materials typical of studio campuses.

As discussed in Section 6.2.2 of the Hydrology and Water Quality Report, post-construction stormwater would be managed via BMPs in accordance with the LID Ordinance. The treatment from these LID BMPs, in addition to proper management of potentially hazardous materials typical of studio campuses in accordance with applicable regulations and the proper management of naturally occurring oil and/or tar, would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., the Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes.

The Draft EIR's hydrology and water quality analysis in Section IV.G, Hydrology and Water Quality, of the Draft EIR accounted for all of the existing and proposed hazardous materials discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As discussed on pages IV.G-32 to IV.G-33 of the Draft EIR, operational activities that could affect groundwater quality include spills of hazardous materials. In accordance with City requirements, source control measures, including adequate housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would reduce water quality impacts and prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, any potentially hazardous materials associated with Project operations, such as the use of small quantities of cleaning solvents, painting supplies and adhesives during set construction, pesticides for landscaping, as well as fuel storage associated with production vehicles, maintenance, and emergency equipment, would be acquired, handled, used, contained, stored, and disposed of off-site in accordance with manufacturers' instructions and all applicable regulatory requirements such that no hazardous materials would contaminate or otherwise affect groundwater. Such protocols may include, but would not be limited to, "spot cleaning" leaks and drips routinely, and labeling drains within the Project Site boundary. While leaking USTs could affect groundwater quality, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, there are currently no USTs within the Project Site, and no new USTs are proposed as part of the Project. In addition, the Project would comply with all applicable regulations and would not affect or expand any areas of contamination, increase the level of contamination, or cause regulatory water quality standards at an existing production well to be violated, as defined

in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality, and the Project's potential impact on groundwater quality during operation would be less than significant.

Regarding the analysis of hazardous substances and groundwater, refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-78. As stated in Response to Comment No. 26-78, a detailed discussion of the existing conditions is included on pages IV.F-20 to IV.F-35 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. This section discusses current and historical uses of the Project Site, including the two former gas stations; the findings of the hazardous materials database search; hazardous materials use and storage; hazardous waste generation, handling, and disposal; former USTs; ASTs; PCBs; asbestos-containing materials; LBP; methane gas; and subsurface investigations. Refer to revised Figure IV.F-1, Hazards and Hazardous Materials Site Map, in Section III, Revisions, Clarifications and Corrections to the Draft EIR. With the implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, impacts related to hazardous materials would be less than significant.

Comment No. 26-112

The DEIR mentions that the City of Beverly Hills draws water from the Hollywood Subbasin. What is the proximity of the closest water supply wells to the Project Site? How is pumping in the subbasin regulated? Are there any limitations on extraction from the subbasin? How will dewatering during construction and/or operations affect the subbasin?

The DEIR states that the analysis utilizes factors in the City's 2006 LA CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions (DEIR IV.G-25). How did the DEIR utilize the listed groundwater factors?

The DEIR surface water impacts discussion refers to 772,000 cubic yards of cut and 50,000 cubic yards of fill. How were those amounts determined? Will Project construction be limited to those amounts of cut and fill? How was the depth of excavation determined? Will other building improvements such as elevator pits or shafts, structural piles or footings, methane mitigation system components such as trenches, etc., cause excavation to go deeper than 45 feet?

Response to Comment No. 26-112

As discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR, the Project Site is located within the Los Angeles Coastal Plain Groundwater Basin and specifically overlies the Hollywood Subbasin. Per LADWP's 2020 UWMP, the Hollywood

Subbasin is an unadjudicated basin, meaning no annual pumping quantities have been established for groundwater users. Refer to Response to Comment No. 26-94 regarding the groundwater depth at the Project Site. As stated on pages IV.G-33 and IV.G-43 of the Draft EIR, there are currently no water supply (i.e., pumping) wells within a one-mile radius of the Project Site.

As discussed on page IV.G-23 of the Draft EIR, based on a review of the California Department of Water Resources (DWR) California's Groundwater Bulletin 118, the subbasin surface area is approximately 16.4 square miles and the total basin groundwater storage capacity is reported to be 200,000 acre-feet.⁵⁶ By comparison, the dewatering analysis evaluated an estimated use of approximately 81 acre-feet, roughly 0.05 percent during the construction duration. As noted in the Dewatering Report included as Appendix FEIR-13 of this Final EIR and Response to Comment No. 11-25, this amount of dewatering would not materially impact the Hollywood Subbasin and is considered less than significant. As discussed in Response to Comment No. 3-7, there would be temporary dewatering during Project construction. No permanent dewatering is proposed. Following completion of the temporary construction dewatering, the groundwater conditions are expected to generally recover to pre-construction conditions.

Regarding the City's 2006 L.A. CEQA Thresholds Guide, as mentioned on page IV.G-25 of the Draft EIR, the Draft EIR relied on the Appendix G CEQA Guidelines thresholds to determine whether the Project would have significant impacts related to hydrology and water quality. Further, the analysis utilized factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The L.A. CEQA Thresholds Guide criteria are listed on pages IV.G-25 to IV.G-26 of the Draft EIR, which were utilized in the impact analysis on pages IV.G-28 to IV.G-44 of the Draft EIR. Specifically, the L.A. CEQA Thresholds Guide identifies the following criteria to evaluate groundwater impacts:

- Change potable water levels sufficiently to:
- Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/ winter peaking, or to respond to emergencies and drought;
 - Reduce yields of adjacent wells or well fields (public or private); or
 - Adversely change the rate or direction of flow of groundwater;

⁵⁶ California Department of Water Resources, California's Groundwater Bulletin 118, Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin, February 27, 2004.

- Result in demonstrable and sustained reduction of groundwater recharge capacity;
- Affect the rate or change direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the CCR, Title 22, Division 4, Chapter 15 and in the Safe Drinking Water Act.

The analysis with regard to groundwater in the Draft EIR included consideration of each of the criteria above. Refer to Response to Comment Nos. 3-6, 11-5, 13-6, and 16-74 for a detailed discussion of the Draft EIR's analysis related to hydrology and water quality.

As discussed in Response to Comment No. 26-55, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 of Section II, Project Description, of the Draft EIR), and any substantial changes from the Project would be subject to further discretionary review and CEQA compliance. As stated on page II-1 in Section II, Project Description, and throughout the Draft EIR, Project construction would require an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill and up to 772,000 cubic yards of export, with a maximum excavation depth of approximately 45 feet.

The earthwork volumes represent a conservative estimate based on the proposed development program as set forth in Section II, Project Description, of the Draft EIR. The elevator shafts, structural piles, footings, methane mitigation systems, and other subterranean components will not exceed 45 feet in depth; accordingly, Project construction will be limited to these earthwork volumes.

Comment No. 26-113

The DEIR information regarding the assessment of construction dewatering is incomplete. There is no information on the nature and extent of the dewatering. How will the dewatering be done? How many wells, what's their placement, size, capacity, etc.? How will spoils from the dewatering well points be handled? How will drilling effluent be handled? What is the rate of the extraction from the wells and their radius of influence? What is the condition of the water to be extracted? This information is completely lacking. The DEIR references pumps and filtration without detail. What filtration? Without this information, how were the impacts conclusions made? Will the dewatering affect the rate

or change direction of movement of existing contaminants? Will dewatering expand the area affected by contaminants? Based on information from Shannon & Wilson, it appears that the dewatering could have an extensive radius of influence. Will dewatering result in an increased level of groundwater contamination? Will it cause regulatory water quality standard at existing production wells to be violated? The DEIR merely refers to the NPDES or sanitary sewer permit requirements, but those requirements focus on the quality of the groundwater at the point of discharge. The NPDES permit would not address the impacts to the groundwater or users overlying the groundwater from the movement of the contaminants. Also, how does HAZ-MM-2 reduce construction groundwater impacts to less than significant? None of this is assessed in the DEIR and the conclusions on DEIR IV.IG-32 [sic] are unsupported.

Response to Comment No. 26-113

Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential impacts from temporary construction dewatering. Refer to Response to Comment Nos. 11-25, 13-6, 16-64, and 26-54 through 26-64 and 26-69 through 26-71 for further information regarding the temporary construction dewatering. Refer to the Dewatering Report in Appendix FEIR-13 of this Final EIR, which was prepared in response to comments for informational purposes and confirms the conclusion in the Draft EIR that impacts related to construction dewatering would be less than significant. This level of dewatering analysis would typically be performed during the design and permitting phases for individual buildings as part of the regulatory building permit process, and not during the entitlement phase. Nevertheless, a Dewatering Report has been completed to provide additional information and analyses at this time.

As discussed therein, the temporary dewatering system would be installed and operated in accordance with NPDES discharge permit or industrial user sewer permit requirements, and the specific dewatering system will be determined during the City's building permit process. During construction, temporary dewatering pumps and filtration would be utilized in compliance with the applicable permit. These temporary systems would comply with all applicable regulatory requirements, including but not limited to SWRCB ORDER NO. 2009-0009-DWQ related to construction and discharges from dewatering operations, as well as LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Appendix D of the Dewatering Report also confirms that impacts related to subsidence from dewatering would be less than significant and would not damage neighboring properties; refer to Appendix FEIR-13 of this Final EIR.

Refer to Response to Comment No. 26-112 regarding the extent of Project excavation.

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, and 26-78 regarding the Draft EIR's analysis of groundwater contamination.

Refer to Response to Comment No. 16-85 regarding the Draft EIR's analysis of groundwater flows.

As discussed in Response to Comment No. 26-112, there are currently no water supply (i.e., pumping) wells within a 1-mile radius of the Project Site.

The Draft EIR analyzed groundwater quality impacts during construction on pages IV.G-30 to IV.G-32 of the Draft EIR. As discussed therein, a temporary dewatering system consisting of pumps and filtration would be installed and operated in accordance with applicable requirements. Any discharge of groundwater during Project construction would comply with the applicable NPDES permit or industrial user sewer discharge permit and applicable LARWQCB requirements. As such, groundwater quality would not be negatively affected by potential dewatering activities.

The presence of any UST or the removal of a UST also could affect groundwater quality. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, all former USTs have been removed from the Project Site, and there is no evidence of existing USTs on-site.

Oil wells may also affect groundwater quality. As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project Site is located within the Salt Lake Oil Fields and the La Brea Oil Field. However, no oil or gas production wells or oil derricks were identified on-site in any topographic maps, aerial photographs, or CalGEM's Well Finder database.

As also discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, based on recent subsurface investigations, elevated concentrations of fuel-related constituents have been detected in soil and groundwater on-site. Residual concentrations would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan set forth in Mitigation Measure HAZ-MM-1. Additionally, the Project Site is located within a City-designated Methane Zone as defined by LADBS. A subsurface investigation conducted in 2018 identified elevated methane concentrations in soils at the Project Site, as well as naturally occurring hydrogen sulfide. As such, the Project would implement Mitigation Measure HAZ-MM-2 to ensure that potential impacts to the public related to

subsurface gases and associated impacts to soil and groundwater are less than significant. Moreover, chlorinated VOCs such as tetrachloroethene (PCE) and trichloroethene (TCE) were detected in groundwater below their respective maximum contaminant levels (MCLs) at isolated locations, with the exception of PCE at one boring, which was detected slightly above the MCL. As previously discussed, during construction-phase dewatering, any discharge of groundwater would comply with the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such regulatory requirements, the extracted groundwater would be chemically analyzed to determine whether the groundwater is contaminated and the appropriate treatment and/or disposal methods, if any. As concluded in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, with compliance with applicable regulations and requirements, Project construction activities would not create or exacerbate a significant hazard to the public or the environment involving the handling and disposal of extracted groundwater.

Furthermore, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, as well as resulting hazardous wastes, could be used/handled during on-site grading and building construction and would require proper management and, in some cases, disposal. The management of such hazardous materials and wastes could increase the potential to release contaminants into the groundwater. The property owner is responsible for compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials and waste would reduce the potential for Project construction activities to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

As stated on page IV.G-32 of the Draft EIR, based on the above, with regulatory compliance and implementation of mitigation to reduce impacts related to hazardous materials (see Section IV.F, Hazards and Hazardous Materials, of the Draft EIR), construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. Therefore, construction-related impacts on groundwater quality would be less than significant.

Regarding the dewatering rate of extraction and radius of influence, refer to the Dewatering Report provided in Appendix FEIR-13 of this Final EIR. Based on the modeling analysis for the Area 2 excavation and assuming lateral infiltration control measures, the collective rate of excavation dewatering for the excavation could be approximately 50 gallons per minute (gpm) to begin with. Once the groundwater table is lowered to the base of the excavation, dewatering rates are estimated to be reduced to 5 to 10 gpm. A total groundwater dewatering quantity of 7.5 million gallons (23 acre-feet) is estimated for Area 2. Dewatering pumping rates would be higher if more than one excavation were

undergoing dewatering simultaneously. The radius of influence, or cone of depression created by the dewatering of the Area 2 excavation for 21 months, is presented in Figure 8B in the Dewatering Report. As described in the Dewatering Report, after the end of the 21-month simulated dewatering period, the model estimated a cone of depression drawdown of approximately 10 feet extending up to approximately 125 feet from the Area 2 excavation perimeter and approximately 4 feet of drawdown at a distance of up to approximately 300 feet from the Area 2 excavation perimeter (Figure 8B). Refer to Response to Comment No. 26-69 regarding the inaccuracies within the commenter's dewatering analysis.

Regarding groundwater movement, the Dewatering Report (Appendix FEIR-13 of this Final EIR) provides a discussion of historical groundwater flow directions and gradient. Overall, the groundwater in the area is expected to flow from northeast to southwest. Review of the State databases Geotracker and Envirostor found no active environmental remediation cases within 1,000 feet from the Project Site boundary. The closest active cleanup site was approximately 1,300 feet distant in the southeast, downgradient direction. The closest active cleanup site in the upgradient direction is approximately 1 mile to the northeast. Thus, these active cleanup sites are well beyond the cone of depression dimensions presented in the Dewatering Report. It is acknowledged there have been a number of completed cleanup sites along Beverly Boulevard and Fairfax Avenue. While there may be low-level residual contaminants in soil and groundwater, there is no evidence of a definable contaminant plume that will get mobilized by temporary dewatering during Project construction.

Comment No. 26-114

The DEIR also does not discuss the types of BMPs that will be used to address impacts related to stormwater runoff. The DEIR states that "with implementation of site-specific BMPs included as part of the [Storm Water Pollution Prevention Plan (SWPPP)] and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff." (DEIR, p. IV.G-29.) The DEIR lacks sufficient information to support such conclusion. What assumptions were made as to the potential pollutants for purposes of these conclusions? What was assumed to be included in the SWPPP to address these pollutants?

The DEIR similarly does not provide adequate information regarding potential pollutants during Project operations as noted earlier. The lack of an accurate, stable and finite project description makes it particularly unclear. How was the scope of potential pollutants determined for the range of permitted uses identified in the DEIR? Which pollutants were assumed for each permitted use? Why does the DEIR assume that the runoff would be typical of urban development given the range of undetailed potential permitted uses? Which BMPs were identified for each of the permitted uses and their associated pollutants?

Without this information, how is the conclusion that, with the LID BMPs, operation of the Project would result in less than significant surface water impacts substantiated?

Response to Comment No. 26-114

Refer to Response to Comment Nos. 3-4, 3-6, 3-7, 13-6, 26-86, and 16-74 regarding the preparation of a SWPPP, implementation of BMPs, and the Draft EIR's analysis of potential surface water impacts.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the accurate, stable and finite Project Description. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the permitted uses within the Project Site.

Refer to Response to Comment No. 26-111 for a discussion of potential pollutants in stormwater runoff.

Comment No. 26-115

The analysis of operational groundwater impacts is even more lacking. There is absolutely no assessment of the impacts of dewatering during Project operations. Will there be no operational dewatering? The description of the methane mitigation systems refers to dewatering. How will the subsurface structures and methane systems be protected against water intrusion if there is no dewatering? It is more likely that there will be operational dewatering.

What will be the nature and extent of such operational dewatering? How is that determined given the lack of development plans? What is the radius of influence of such dewatering? What is the condition of the groundwater? Will the operational dewatering spread contamination? How will that affect the surrounding property? How will that affect the ability of Beverly Hills to continue to use the water for potable uses? What is the status of the Hollywood Subbasin under the Sustainable Groundwater Management Act?

Response to Comment No. 26-115

As discussed in Response to Comment No. 3-7, the Project would include temporary construction dewatering and not permanent dewatering.

Refer to Response to Comment No. 13-6 regarding the Project's methane mitigation system and any potential dewatering associated with such system.

The questions regarding the nature and extent of dewatering, radius of influence, condition of groundwater, and contamination spread are similar to the questions in Comment No. 26-113. Refer to Response to Comment No. 26-113.

The assertion regarding the lack of development plans is incorrect. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Refer to Response to Comment No. 26-112 regarding the Project Site's location within the Hollywood Subbasin. Per LADWP's 2020 Urban Water Management Plan, the Hollywood Subbasin is unadjudicated, located outside the adjudicated portion of the Central Basin. Also, the same report states the Hollywood Subbasin was classified as very low priority by the California Department of Water Resources and thus is not subject to management by a Groundwater Sustainability Act (GSA) or a Groundwater Sustainability Plan (GSP) (refer to page IV.G-40 of the Draft EIR).

At this time, there are no plans for the Project to use on-site pumped groundwater for Project Site potable water uses, irrigation uses, or any other uses. If the groundwater is not used there would be no impact on use of the groundwater by others, including the City of Beverly Hills, which has wells that are located more than one mile to the northwest.

Comment No. 26-116

As with the Hazards and Hazardous Materials section, the Hydrology and Water Quality section makes unsubstantiated assertions regarding the use of hazardous substances. On what basis does the DEIR determine that the usage would be small quantities? How can the DEIR assume that no USTs will be included with the Project when the Project also proposes fuel storage? How will that fuel be stored? Will they be stored in above grade tanks? Where on the Project site will the fuel be stored? At what quantities? Will there be multiple fueling locations? Who will be able to dispense the fuel? Which regulatory agencies will evaluate the proposed fueling operations? How did the DEIR evaluate the potential hazards and other impacts of such storage and usage?

Response to Comment No. 26-116

In regard to the Project's use of hazardous substances, refer to Response to Comment No. 26-78.

The Project does not include a fueling station; this has been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. There are currently no USTs at the Project Site. The only petroleum storage tanks at the Project Site are ASTs used in connection with the emergency generators. There are currently six diesel-fueled emergency generators on-site. The diesel fuel is stored in permitted ASTs. As discussed

on page IV.F-48 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, any additional generators will comply with applicable regulatory requirements, including those related to fuel storage (California Aboveground Petroleum Storage Act, HSC Sections 25270–25270.13; 40 CFR Part 112 and HSC Section 25270.5[c]). As stated in the Draft EIR, the Project would replace five of the six existing emergency generators (see page IV.E-81 of the Draft EIR).

Comment No. 26-117

In addition to the noted deficiencies in the Project analyses, the analysis of cumulative hydrology and water quality impacts is deficient. The cumulative impacts analysis appears to be limited to the 68 identified related projects. Aside from the fact that the related project list is clearly missing known related projects (such as the Holocaust Museum), the list does not account for related projects through Project buildout at 2043. How are the cumulative impacts through Project buildout at 2043 assessed? What assumptions were made regarding groundwater conditions and dewatering in the area?

Response to Comment No. 26-117

Project impacts associated with long-term buildout through 2043 related to hydrology and water quality are specifically addressed in Section IV.G, Hydrology and Water Quality, of the Draft EIR. As discussed therein, while Project buildout is anticipated in 2026, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the proposed Specific Plan and Mitigation Monitoring Program throughout the term of the Development Agreement. The Specific Plan and the Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable PDFs and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, given that impacts related to hydrology and water quality are site-specific and do not typically vary over the course of relatively short timeframes, a later buildout date would not affect the impacts or significance conclusions presented in the Draft EIR, including the cumulative impact analyses.

Additionally, the number of related projects considered as part of the cumulative impact analyses in the Draft EIR would not alter the analysis therein. As discussed in Subsection 3.f of Section IV.G, Hydrology and Water Quality, of the Draft EIR, with regard to surface water quality, as with the Project, related projects would be subject to NPDES requirements relating to water quality for both construction and operation. Related projects would be required, pursuant to the City's LID Ordinance (or equivalent requirements in other jurisdictions, including the cities of West Hollywood and Beverly Hills), to implement

BMPs that target potential pollutants that could be carried in stormwater runoff. Additionally, regarding groundwater quality, like the Project, the related projects would be required to comply with applicable regulations during construction and would implement site-specific measures where needed. With regard to surface water hydrology, in accordance with City requirements, related projects and other future development projects would be required to implement BMPs to manage stormwater in accordance with LID guidelines. With regard to groundwater hydrology, as with the Project, any related project would be required to evaluate its individual impacts to groundwater hydrology due to temporary or permanent dewatering operations. If any related project requires permanent dewatering systems, such systems would be regulated by the LARWQCB. Should excavation for other related projects extend beneath the groundwater level, temporary groundwater dewatering systems would be designed and implemented in accordance with NPDES permit requirements. Additionally, as with the Project, related projects would be required to implement BMPs to capture stormwater runoff on-site, thereby minimizing effects on groundwater recharge. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

Refer to Response to Comment No. 26-159 with regard to the Holocaust Museum and the related projects list as it relates to long-term buildout.

Comment No. 26-118

H. Land Use and Planning

A portion of the Project Site is located in the unincorporated County of Los Angeles and subject to County regulation. The DEIR does not include any discussion of applicable County Code regulations regarding land use. Why was this not included in the DEIR?

How will the Specific Plan regulations deviate from the County Code? Will the change in regulation alter the extent of impacts to the surrounding properties? For example, the County regulates noise quite differently than the City. Will the Specific Plan allow the Project to generate greater sound levels than under County regulations? If so, how? And why is that not disclosed?

If the County portion of the Project Site is not annexed to the City, how will that change the Project and development pursuant to the Project? With which specific County land use policies that have been adopted to address environmental impacts will the Project be consistent and inconsistent? To the extent there are inconsistencies, how will these impacts be addressed?

Response to Comment No. 26-118

As discussed in Section II, Project Description, of the Draft EIR, the Project Site has three existing zone designations—C2-1-O, C1.5-2D-O, and C-MJ. The C2-1-O Zone is codified in Section 12.14 of the LAMC, with height and oil drilling criteria listed in Sections 12.21.1 and 13.01 of the LAMC, respectively. This portion of the Project Site presently has no height limit. The C1.5-2D-O Zone is codified in Section 12.13.5 of the LAMC with the height and oil drilling criteria listed in Ordinance No. 171,432 and Section 13.01 of the LAMC, respectively. This portion of the Project Site presently has no height limit. The remaining portion of the Project Site (approximately 0.63 acres in size and proposed to be annexed into the City of Los Angeles) is zoned C-MJ and codified in Title 22, Division 3 (22.20.030) of the Los Angeles County Code. Under the Los Angeles County Code requirements, this portion of the Project Site is the only parcel currently subject to a height limit. The current maximum height for this parcel is 65 feet, with the ability to increase to 75 feet through the utilization of a CUP. This small remnant unincorporated County parcel is completely surrounded on all sides by properties in the City's jurisdiction. These zones are identified in Table II-1 on page II-10 and discussed on page II-9 of the Draft EIR.

As discussed on pages II-35 and II-36 in Section II, Project Description, of the Draft EIR, the Project's requested approvals include annexation of the approximately 0.63-acre portion of the Project Site located within unincorporated Los Angeles County into the City of Los Angeles, including a General Plan Amendment and Zone Change to pre-zone the County land, as required under the laws governing annexation (this action would be included in the General Plan Amendment and Zone Change described below), and related applications to the Local Agency Formation Commission. Thus, the proposed Project would include the annexation of the County parcel into the City. The annexation is a necessary Project entitlement and the Project would not proceed without the annexation. Deviations from County Code are therefore not the appropriate standards for CEQA analysis purposes. Accordingly, Section IV.H, Land Use and Planning, of the Draft EIR properly included an analysis of the Project's consistency with applicable City, rather than County, plans and policies. In addition, Section IV.I, Noise, of the Draft EIR analyzed the Project's potential noise impacts in accordance with City standards and CEQA.

As the Lead Agency under CEQA, the City of Los Angeles has prepared and processed the Draft EIR in accordance with all applicable requirements and guidelines. As described above, all relevant information regarding the existing County of Los Angeles zoning and land use policies have been disclosed in the Draft EIR. The commenter has provided no new significant information that disputes that the City has incorrectly analyzed the future annexation of the approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County of Los Angeles.

Comment No. 26-119

Without the actual Specific Plan, which is not included as part of the DEIR, it is impossible to assess potential land use impacts. The Specific Plan is the essential controlling land use document being proposed and the public needs to be able to see it in order to assess its impacts. Why was the Specific Plan not included with the DEIR? Does the City have a copy? If so, why wasn't it provided? If not, how did the DEIR evaluate the proposed Project? The Specific Plan must be provided to the public and decision-makers in a recirculated DEIR.

How will the Specific Plan change the LAMC regulations for the Project Site? The proposed deviations from the LAMC need to be disclosed and the impacts of those changes assessed.

CUL-PDF-1 presents "Project Parameters," but the "Project Parameters" state that they "will not limit the land uses or floor areas permitted under the proposed Specific Plan." So, what are they for? They merely outline what portions of the existing property will be demolished and purport to establish some height limits. This is not a discussion of the Project's Specific Plan or the actual land use regulations that will apply to the Project Site. The public cannot understand the Project's actual land use impacts based on the Project Parameters. The Specific Plan must be provided to the public and decision-makers in a recirculated DEIR.

Response to Comment No. 26-119

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project. A draft Specific Plan is not necessary for evaluation of the Project. Nevertheless, an initial draft of the Specific Plan that was provided by the Applicant has been publicly available as part of the administrative record since 2021. In response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website for informational purposes. Please note that the Preliminary Draft Specific Plan includes the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Refer to Response to Comment No. 26-22 regarding the Project's consistency with the LAMC.

Lastly, this comment discusses the Project Parameters (Project Design Feature CUL-PDF-1) included on pages IV.B-38 to IV.B-40 in Section IV.B, Cultural Resources, of the Draft EIR, and seems to confuse the Project Parameters and the Specific Plan. As stated on page IV.B-38 of the Draft EIR, "[the] Project Parameters set forth the maximum permitted development footprint and building heights for new adjacent construction and additions to the Primary Studio Complex to ensure that the historic significance of the Primary Studio Complex is not adversely impacted by new construction. These Project Parameters will not limit the land uses or floor areas permitted under the proposed Specific Plan." As stated in Section II, Project Description, of the Draft EIR and throughout the Draft EIR, the Specific Plan would regulate land use and floor area, among other regulations, in addition to the restrictions contained in the referenced historic Project Parameters. Compliance with the Project Parameters would be ensured by the Mitigation Monitoring Program and the Specific Plan.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-120

The DEIR includes a long list of permitted land uses, ranging from office, studio uses, basecamps, conference facilities, parking, commercial and retail uses, special events, theaters, warehouses, and dozens of other uses that do not seem to be consistent with a television or film studio. The DEIR states that any use in the C2 zone not prohibited by the Specific Plan (which is not provided) is permitted. The potential impacts associated with each of these uses vary significantly.

How those uses are permitted is unclear. How much floor area is allowed for each of these uses? Is there any limitation on the quantity or location of the various permitted uses? To what extent do the various permitted uses have to support the studio use? Some of the uses listed on pages IV.H-22–23 specify that they are related to on-site uses and activities, but most do not. What amount of studio use is required before supporting uses are developed? Do the studio uses have to be on-site? Can the Project consist of just office and warehouse uses without sound stages? Can the Project consist of production vehicle storage and support for regional movie productions occurring elsewhere? Absent the Specific Plan, all of this is unclear and the various DEIR impact analyses must assume the full range of possibilities. Is there any limitation on the nature and extent of visitor-generating uses on the Project Site? Can all the sound stages have audience shows at the

same time? Is there any limit on the type, size, quantity and frequency of special events? How did the DEIR account for the varied impacts of each permitted use? While the DEIR seems to have assumed that each of the five uses is monolithic, the DEIR makes clear it is not. Dozens of uses are actually permitted. There is no analysis of impacts of these uses from a land use perspective or otherwise. Why not?

For example, what are the “conference facilities” described in the DEIR? How did the DEIR analyze potential impacts from such a use? What is the maximum square footage permitted for conference facilities? What land use of the five described in the DEIR (sound stages, production support, production office, general office, and retail) does the conference facility fall under? Without the definition of the various use categories, this is unclear. Do they fall under office use? Does that mean there can be 1.4 million square feet of conference facilities at the Project Site? Or can there be only a limited ratio of conference facilities to stage or office uses? Conferences generate substantial parking demand, trips, and VMT. How did the DEIR’s analysis account for these impacts?

Similarly, what is meant by the “e-sports” referenced in the list of uses? What does this use entail? Is there a maximum area that can be devoted to this use? What land use category (e.g., sound stages, production support, etc.) does e-sports fall under? Can the sound stages be used for e-sports competitions? E-sport events can attract tens of thousands of spectators and have a significant electrical demand. (See, e.g., 2015 League of Legends Championship Tournament selling out Madison Square Garden, <https://www.businessinsider.com/league-of-legends-championship-series-at-madison-square-garden-2015-8#the-2015-north-american-league-of-legends-championship-tournament-is-held-at-world-famous-stadium-madison-square-garden-msg-msg-has-a-capacity-of-18200-and-tickets-for-both-days-of-the-weekend-are-sold-out-1>.) How will these spectators be accommodated? Where will they park? What electrical infrastructure will be needed to support this activity? Without the Specific Plan, there are a number of unanswered and relevant questions, such as what would be the hours of operation for e-sports uses? What would be the seating capacity? Depending on the nature of the e-sport use, it could generate substantial parking demand, trips, and VMT. Does the Specific Plan include any constraints on this use? How did the DEIR account for this use and its potential impacts?

Response to Comment No. 26-120

Refer to Response to Comment No. 26-119 regarding the Specific Plan. Refer to Response to Comment Nos. 5-6 and 26-14 and Topical Response No. 3, Permitted On-Site Uses, regarding the clarified list of permitted uses. Also refer to Topical Response No. 3 regarding special events. With regard to audiences, refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation.

Regarding the maximum floor area, refer to pages II-12 to II-16 in Section II, Project Description, of the Draft EIR and Response to Comment No. 26-16.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory framework under the proposed Specific Plan, which requires a discretionary approval and subsequent CEQA compliance review for any substantial changes to the Project that was analyzed in the EIR.

As discussed in Response to Comment No. 26-16, the Project Site will not be used for off-site productions.

The comments regarding permitted uses are similar to Comment No. 26-14. Refer to Response to Comment No. 26-14 for further discussion of the permitted uses.

Refer to Topical Response No. 13, Parking, regarding how the proposed on-site parking supply would meet the peak parking demands of the Project. Please note that the adequacy of a development's parking supply is not a CEQA impact.

Refer to Response to Comment No. 35-84 regarding how the Project's impacts associated with energy were comprehensively analyzed in the Draft EIR. The analysis includes a detailed analysis of energy usage associated with sound stages and accounts for audience-based shows.

Comment No. 26-121

What is the definition of production support? Which permitted uses fall under the production support land use category? Is there a cap on the amount of production support floor area? The DEIR states that it can be increased from 104,000 square feet, but no maximum is provided. As noted elsewhere, there appears to be an extensive amount of active production area that is not being included as floor area. Why? If these areas are enclosed and actively used for production why would they not be included as floor area? From the application documents, it appears that much of the below grade levels can be utilized for production support and basecamps. That is hundreds of thousands of square feet. Has the impact of these active production zones that are not included in the Project's definition of floor area been analyzed throughout the DEIR? What restrictions are applicable to limit the amount of unaccounted floor area? If not restricted, how can the community know, for example, the amount of production trucks and trailers that can access the site over time?

Response to Comment No. 26-121

The definition of production support has been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR, as “[a] studio land use primarily used for the support of production activities and employee services.” This definition, which is based on the definition in the Paramount Pictures Specific Plan,⁵⁷ is consistent with the Draft EIR’s analysis. The same definition is included in the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning’s website.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 26-17 regarding the proposed Land Use Exchange Program.

As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, CEQA requires an analysis of all physical environmental impacts, regardless of how something is defined or classified in a land use regulation (e.g., noise impacts from an above-ground parking structure must be analyzed under CEQA even though a parking structure is not considered floor area under the LAMC). As such, even though basecamp and outdoor production activities are not counted as floor area, these activities were fully accounted for in the EIR’s environmental analysis.

Basecamp and outdoor production activities currently occur throughout the Project Site and would continue to occur in a similar manner within the Project, as the Project will continue the studio use. Refer to Figures II-3(a), II-3(b), II-4(c), II-4(d), and II-4(e) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, which show the existing and proposed basecamp and outdoor production activity areas. Basecamp and outdoor production activity areas are related to and dependent upon sound stages; those areas do not separately generate production activity. Basecamp activities are described on page II-7 of the Draft EIR as defined areas at, near, or within a filming location where critical production activities can be coordinated. These areas include, but are not limited to, loading, wardrobe, hair, make-up, craft service, parking, storage of mobile facilities, support vehicles, etc., which are all related to production activities. Within the Project Site, basecamp and outdoor production activities typically occur within existing surface parking areas and other open areas. As shown in Figure II-3(b) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, there is approximately 177,000 square feet of existing basecamp areas to support the approximately 95,540 square feet of existing sound stages. The Project would include approximately 194,600 net new square feet of basecamp (371,600 square feet total), which was accounted for in the Draft EIR’s analysis

⁵⁷ Ordinance No. 184,539.

(see the utilities and service systems analyses in the Draft EIR; specifically, Tables IV.M.1-5, IV.M.1-6, IV.M.2-2, and IV.M.2-3 in Sections IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, and IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR). Outdoor production activities were analyzed in Section IV.I, Noise, of the Draft EIR. As discussed on page IV.I-44 of the Draft EIR, outdoor production activities currently occur throughout the Project Site, and noise sources associated with outdoor production activities include, but are not limited to, setup and take down of set, and outdoor filming activities. The square footage of basecamp and outdoor production activity areas are already reflected in the LADOT-approved trip rates for the studio land uses used in the Project's transportation analysis.

Further, as discussed in Response to Comment No. 26-16, while outdoor production activities may occur at Project Grade, no active production activities or uses would occur in the parking and basecamp areas below Project Grade. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As discussed on page IV.H-46 in Section IV.H, Land Use and Planning, of the Draft EIR, the Project would include two primary production levels to provide access, staging, storage, and connectivity between active production and supporting uses. The lower level, or the production operations level, would provide large areas of flexible space to house production vehicles and store equipment. Both the at-grade production activity level and the below-grade production operations level would provide space for basecamp, production staging, loading, and emergency vehicle access throughout the Project Site.

With regard to truck trips during operation of the Project, refer to Section D, Basecamp Trips, of Topical Response No. 10, Trip Generation, which discusses the ancillary nature of the trips to/from the basecamp areas of the Project Site. Basecamp areas do not generate trips in and of themselves; rather, they support the sound stage uses within the Project Site, and, thus, it is the sound stages that generate the trips to/from the Project Site. The Project's ability to switch between land uses within the Project is controlled by an evaluation of the trip generation of the land use categories being modified. Section E, Truck Trips, of Topical Response No. 10, Trip Generation, provides information of the number of truck trips generated by each of the land uses within the Project. As discussed in Response to Comment No. 26-17, it is not necessary to specify the precise number of trailers as such specific data is not necessary for any CEQA-related analysis.

Comment No. 26-122

The DEIR provides: "Specific proposals for development that involve a land use exchange would require review by the Director of the Department of City Planning. This process would entail a determination of whether the development proposal complies with the Specific Plan regulations and mitigation measures set forth in the Mitigation Monitoring Program for the Project and whether the environmental impacts resulting from the

proposed development would be within the envelope of impacts identified in this EIR.” Without the definition of the various land uses, it is not possible to assess what uses could be exchanged for other uses. Would e-sport uses come under stage or production support? If production support, that doesn’t seem to be limited in land use exchange. Would theater come under stage, production office, or production support? Without the Specific Plan attached to the DEIR, how does the public know what process would be followed for a land use exchange and how potential impacts would be assessed? The DEIR must be recirculated with the Specific Plan.

Response to Comment No. 26-122

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project, and CEQA and City policy do not require inclusion of a Specific Plan in either the Draft EIR or the Final EIR. Further, the Draft EIR’s environmental analysis accounts for the maximum potential environmental impacts associated with buildout of the Project. For each environmental topic, as applicable, in addition to analyzing the impacts of the proposed development program, the Draft EIR also analyzed the maximum impact scenario (i.e., the development scenario under the Land Use Exchange Program that would generate the greatest environmental impact). Please refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic. Refer to Topical Response No. 1 and Response to Comment No. 26-17 regarding the proposed Land Use Exchange Program. Please note that the Preliminary Draft Specific Plan incorporates all of the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

All of the proposed studio and studio-related uses were disclosed in the Draft EIR. The definitions of the five permitted land uses have been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, as discussed below, and are included in the Preliminary Draft Specific Plan, which is publicly available and can be accessed on the Department of City Planning’s website. The definitions of the five permitted land uses, as well as the other definitions in the Preliminary Draft Specific Plan, are consistent with what was analyzed in the Draft EIR. The definitions of the five permitted studio uses from the Preliminary Draft Specific Plan are included below for reference.

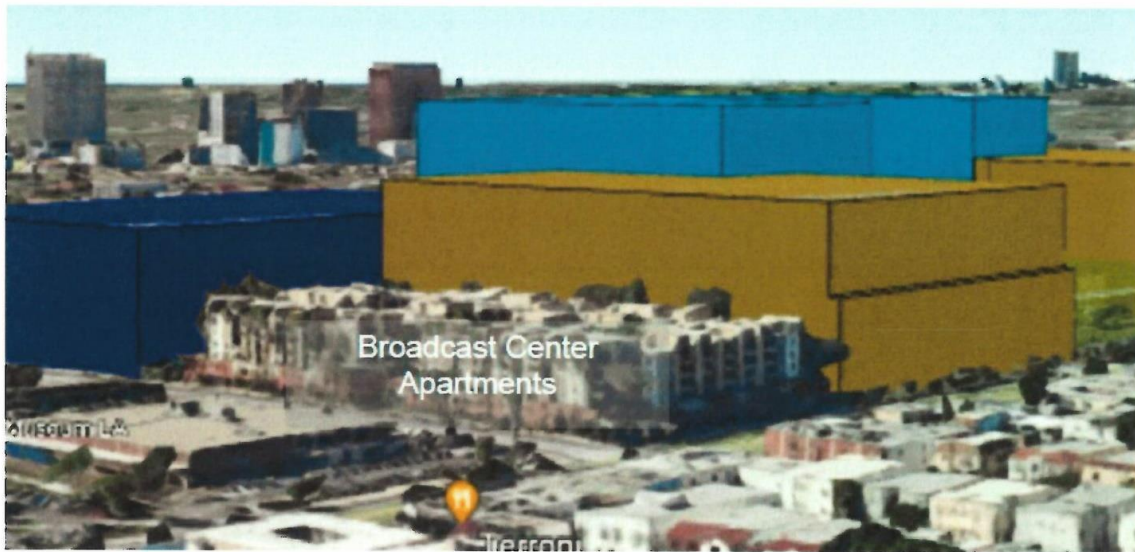
- **Sound Stage(s).** A studio land use that includes permanent buildings for production activities and which may contain Sets/Façades.
- **Production Support.** A studio land use primarily used for the support of production activities and employee services.
- **Production Office.** A studio land use that includes those office uses associated with or in furtherance of production activity, including but not limited to merchandising, marketing, promotion, licensing, sales, leasing, accounting, distribution, legal, and administration.
- **General Office.** A studio land use that includes general office uses, which may or may not include those office uses associated with or in furtherance of production activity, including but not limited to merchandising, marketing, promotion, licensing, sales, leasing, accounting, distribution, legal, general commercial, professional, executive, business, and administration.
- **Retail.** A studio land use that includes all Neighborhood Retail uses identified in LAMC Section 13.07 C.

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 26-14 regarding the five permitted studio uses, as well as e-sport and theater uses.

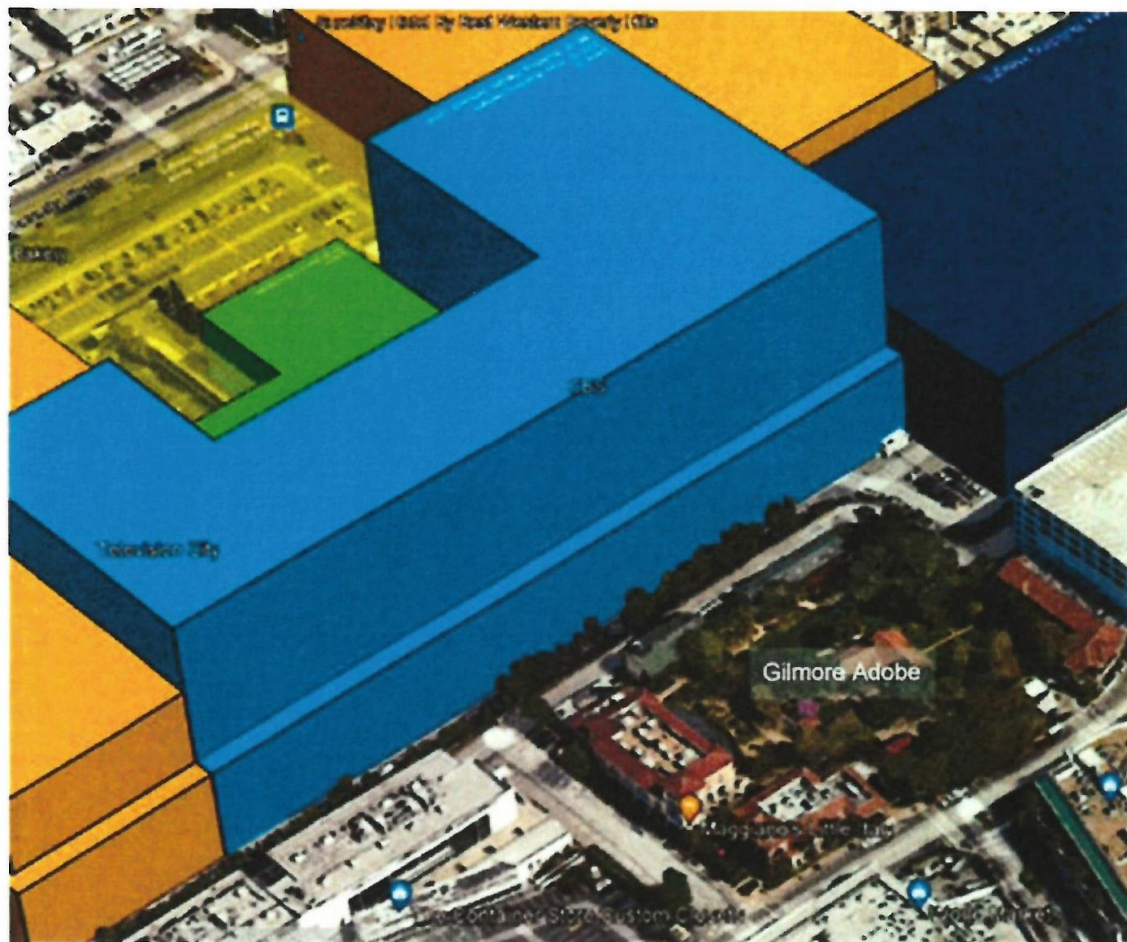
With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-123

Are the height zones fixed or can they be changed under the Specific Plan? In addition, some height zones have base limits, but are allowed a maximum height for 40% of the area. What was the basis for selecting 40%? The 40% limitation above base height does not appear to be restricted in terms of placement or individual building size. For example, Height Zone C permits building up to 160 feet next to the residential building to the east. Given the land area of Height Zone C, can a 160-foot tall building be built all along the boundary of the Broadcast Center Apartments? That would overwhelm the Broadcast Center Apartments as shown in the 3-D imaging of the Project Height Zones below.



Similarly, can a 225-foot building be built along the southern boundary adjoining the Farmers Market and Gilmore Adobe?



Are there additional limitations in the Specific Plan that would reduce the impacts on the Broadcast Center Apartments? Is there any limitation as to the size of the individual building floor plate that can be built in these maximum Height Zones? Since the Specific Plan is not provided, please clarify the regulations related to the Height Zones and to what extent the Height Zones can be modified.

Further, Height Zone A allows structures up to 58 feet in height (shown as the slightly transparent area in the front of the height zone model, below).



This conflicts with the stated goal of restoring views of the Historical Cultural Monument. If there is a 58-foot building, how will anyone at the pedestrian level be able to see the HCM? Isn't that a significant impact to the HCM? The DEIR must address this issue. Will the subsequent review by OHR referenced in the DEIR be a discretionary review? Will further environmental analysis be conducted? If not, what are the standards that will be objectively applied?

According to the DEIR, the Specific Plan will include historic preservation regulations? What are these regulations? How will they alter the placement of buildings under the conceptual plan and height zones? How will regulations address placement of new structures, including their locations, design, materials, and paint? How do the regulations comply with the Secretary of Interior Standards? Did an architectural historian prepare the preservation regulations? Will the regulations also address impacts to the adjacent historic resources such as the Adobe? The regulations should be provided to the public for review and comment as part of a recirculated DEIR.

Response to Comment No. 26-123

As discussed in Response to Comment No. 5-9, the illustrations provided in this comment are inaccurate and do not portray what could be built under the proposed Specific Plan. Regarding building heights and height zones, stepbacks, and frontages, refer to Response to Comment Nos. 9-16, 11-3, 26-6, and 26-7. The height zone regulations discussed in the Draft EIR are the same as those included in the Preliminary Draft Specific Plan. Any changes to the height zone regulations in the adopted Specific Plan would require a Specific Plan Amendment, which is a discretionary approval that requires CEQA review, per the proposed Specific Plan. Additionally, as discussed in Response to Comment No. 26-7, the Project is exempt from the study of aesthetics impacts in the CEQA analysis.

Refer to Response to Comment Nos. 26-7 and 26-45 and Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the restoration of the historic viewshed along Beverly Boulevard and any potential development considered within that zone.

With regard to historic preservation regulations in the proposed Specific Plan, refer to Response to Comment No. 9-18. With regard to adjacent historical resources, refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources. In addition, refer to Topical Response No. 5, Historical Resources, for further comment and summary of analyses regarding historic resources, related professional analysis, and adherence to LAMC Section 22.171.14.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-124

The Project does not appear to provide for any meaningful separation from offsite sensitive uses. Based on the conceptual plan the “frontage areas” that are supposed to provide a buffer are actual internal roads. How does a road for production trucks, with their related emissions and noise, provide a buffer to the offsite sensitive uses? In some cases, the “frontage area” is actually the sidewalk. The “stepbacks” only apply over 88 feet and then are still limited. What are the actual requirements that will be applied in the Specific Plan given that the conceptual plan is but one example of what might be built? Why aren’t significant setbacks required along the eastern and southern boundaries? Why can’t such setback be required? What would be the impact on overall Project Site development if meaningful setbacks were required?

Response to Comment No. 26-124

Refer to Response to Comment Nos. 9-16, 16-76, 26-7, and 26-8 regarding the required frontage areas and setbacks, and impacts to adjacent uses. As discussed therein, the distances between future Project buildings and off-site buildings such as the Broadcast Center Apartments and Gilmore Adobe would be substantial. Further, the uses contemplated in the frontage areas exist today and would not change in the future; refer to Figure II-8 on page II-517 within Response to Comment No. 26-8, above. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the frontage and setback regulations discussed in the Draft EIR are the same as those in the Preliminary Draft Specific Plan, and a discussion of the regulatory framework detailed in the Preliminary Draft Specific Plan.

Comment No. 26-125

What are the parking ratios for each use? Are there minimum and maximum parking requirements? How do the Project's parking requirements compare to existing code? How do the parking requirements apply to operational needs? To the extent the requirements are less than code, how did the DEIR assess the impacts to the surrounding community? Recently, the website of one of the TVC audience shows encouraged show attendees to park in The Grove parking structure. To the extent the requirements are greater than existing code, how does that support the assumed VMT reductions from transit? It is not possible to assess these questions with the information in the DEIR. Without the Specific Plan, the public and decision-makers have no idea how much parking would be required or is appropriate under various development scenarios.

The amount of parking directly impacts environmental impacts through construction impacts and air emissions. The DEIR assumes 5,300 parking spaces. Is that based on the conceptual plan? Is that based on the conceptual square footage table? Which permitted uses were assumed under each land use category to determine the parking requirements? Is the Project limited to a maximum 5,300 spaces? If not, how many can be provided? Is there a minimum amount of spaces required? What minimum and maximum parking is required for "audience and entertainment shows", "museum exhibits," "theaters," "e-sports," "fitness facilities," etc.? The parking requirements for each permitted use should be disclosed. Will there be a fee for parking on the Project Site? Will parking be charged to employees and visitors? Audience show guests? [sic] If there is a parking fee, how will these fees encourage parking in surrounding areas?

Response to Comment No. 26-125

The Project Site is adjacent to a Major Transit Stop at the intersection of Beverly Boulevard and Fairfax Avenue, as defined by PRC Section 21064.3. As such, recently enacted State legislation (AB 2097) prohibits a public agency from imposing or enforcing

any minimum automobile parking requirements on any residential, commercial, or other development project that is within 0.5 mile of a Major Transit Stop, with minor exceptions.

However, as discussed in Topical Response No. 13, Parking, sufficient parking for the proposed uses would be provided on-site to accommodate the Project's peak parking demands, including audience parking, such that spillover parking would not occur. Off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Please note that the adequacy of a project's parking supply and congestion are not CEQA impacts pursuant to SB 743. Refer to Topical Response No. 13, Parking, regarding the Draft EIR's analysis of impacts associated with parking.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, neither CEQA nor City policy requires a draft Specific Plan to be included in the EIR. Please note that the parking ratios discussed in Section IV.K, Transportation, of the Draft EIR are identical to those in the Preliminary Draft Specific Plan. Also refer to Topical Response No. 3, Permitted On-Site Uses, regarding the clarified list of uses proposed by the Project.

Unlike The Grove, employees and visitors to the Project Site will not pay for parking as part of their entry to the Project Site, and, therefore, there will be no reason to park off-site.

Comment No. 26-126

Will the Specific Plan include design regulations for the entry ways to the Project Site, including establishing queuing requirements? Will the Specific Plan require separate entrances for (i) production trucks, (ii) employees and contract workers and (iii) visitors (including audience shows) to facilitate access and circulation? How will the design queue compare with expected peak arrivals for various users (audience shows, employees)? Will there be a security check in at the entry gates? How will delay at the security check-in be incorporated into the entry design requirements to restrict back up on to the street system?

Response to Comment No. 26-126

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, for a discussion of queuing at the Project driveways and the analysis methodology that went into the calculation of the queuing at each driveway. Refer to Table II-12 therein, which shows the queue processing times for different vehicles (employees, audience/visitor, and trucks). A security check at the entry gates would continue to be implemented, and the time required for that security check has been factored into the processing time for each group of vehicle types entering the Project Site.

The proposed Specific Plan would not include the regulations or the separation by vehicle type at different driveways as listed in this comment. The driveways are intended to offer access to all types of vehicles entering/leaving the Project Site. In each case, the types of vehicles projected to enter a specific driveway have been factored into the location of the security check point, the number of entry and exit lanes at each driveway, and the assignment of vehicle types to specific inbound lanes at each driveway. The comparison of peak demand and available queuing is shown in Table-II-13(a) in Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion. The design of the driveways and queuing calculations would be reviewed and confirmed by LADOT as a part of the regulatory building permit process.

Comment No. 26-127

What is the maximum amount of parking that may be required under the highest parking intensity uses? For example, if there are 7,800 employees and another 5,000 audience show members and special event guests, where will the 12,800 people park? Please detail parking required for each use. How does this figure differ from 5,300 spaces quoted in the DEIR? How did the DEIR analyze the impacts from the development of the maximum required parking? How much will be developed? Where will it be located? How will it be constructed?

The DEIR states that the Specific Plan “would set forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained.” How will the adequacy of the parking supply be determined? What are the parameters for allowing reduced or shared parking? What types of uses will be permitted to have reduced or shared parking and on what basis? Where will the parking be provided? How will tandem and valet parking be managed? How will the arrival of guests for multiple audience participations shows and special events be managed on-site so as to not queue on the adjacent streets or not result in parking in the community? What evidence is there in the DEIR to support such determinations?

The DEIR further states that “parking may be located anywhere within the Project Site or off-site upon the submittal of an off-site parking agreement or covenant satisfactory to the Director of the Department of City Planning. Furthermore, temporary off-site parking due to displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed.” The DEIR does not analyze the potential impacts of such offsite parking. Where would the offsite parking be located? How many spaces might be located off-site? How often could this occur? How much parking could be displaced by production? How were the impacts of this offsite parking (shuttles, traffic in community, etc.) analyzed in the DEIR?

What number of production vehicles may access the site on a daily basis? What is the maximum? What is the mix of sizes and types of production vehicles to access the site on a daily basis? What amount (spaces and square feet) is needed for production support and basecamp parking to accommodate these vehicles? How were the impacts from these production support and basecamp parking areas assessed in the DEIR? Wide areas are needed for these vehicles which can include various sized trucks, including 18 wheeler trucks, trailers, and modular buildings. What regulations will apply to the production support and basecamp parking areas? If the below grade areas are used for production and basecamp areas, how will cars access the proposed parking garage on the east side of the Project site at Grove Drive from the Fairfax entrance? Will access be limited by varying levels of production activity?

The DEIR authorizes different types of parking: “above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully-automated parking operations.” Do the different types of parking have a different effect on the transportation analyses? How were the impacts of development of the different types of parking analyzed in the DEIR? If automated parking is employed, how will the arrival of employees and guests be managed on-site so as not to queue on the adjacent streets? What evidence is there in the DEIR that supports such determinations?

Response to Comment No. 26-127

Although the adequacy of a development’s parking supply is not a CEQA impact per SB 743, a response to this comment is included for informational purposes. Refer to Topical Response No. 13, Parking, for a discussion of the Project’s proposed on-site parking supply, the parking provisions in the Preliminary Draft Specific Plan, the adequacy of the proposed on-site parking supply to meet the peak parking demand of the Project and prevent spillover parking, and the results of the shared parking analysis. Section B, Off-Site Parking, of Topical Response No. 13, Parking, discusses the fact that off-site parking would not be needed to support the Project. Accordingly, off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The implication that 12,800 people or vehicles will need to park simultaneously on the Project Site is incorrect. Table 13 on page 123 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the total number of vehicle trips to/from the site every day would be approximately 13,454. This estimate includes employee vehicle trips, visitors and audience member trips and truck trips. Given that this number represents two-way trips, the maximum number of individual vehicles on the Project Site each day would be approximately 6,727, and not all of these vehicles would be on the Project Site simultaneously. The estimate of parking demand by user group throughout the day is shown in Table II-15 of Topical Response No. 13, Parking. The results of the shared parking analysis presented in Table II-15 indicates that the peak parking demand would

occur in the late morning time period when a maximum of approximately 5,081 cars would be parked on the Project Site.

The comment regarding the number of audience members is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding the number of audience members and audience trips under existing conditions and with the Project.

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, for a discussion of truck activity at the Project Site. The Project Site will serve an estimated peak activity level of 18 heavy trucks (semi-trucks), 43 10-ton trucks, and 22 5-ton (single unit) trucks per day. The level of specificity regarding truck size and function is not necessary information to conduct the transportation analysis. The number and size of trucks are all that is needed, and these details are explained in Section E, Truck Trips, of Topical Response No. 10, Trip Generation. The activity generated within the production support and the basecamp areas are all included in the Project trip generation estimates and, therefore, are included in the transportation analysis.

Comment No. 26-128

What are the referenced “streamlined” alcohol use approval procedures? What are the “certain conditions” that must be met? What are the conditions for the off-site consumption and “tasting”? How many people can attend the tastings? What security measures will be required? What are the hours of operation? Where will the 10 new on-site and 2 new off-site alcohol uses be located? Given that there are only 20,000 sf of retail and restaurant use, why does the Project require 12 on-site alcohol uses? Is there additional square footage for which alcohol use will be permitted? How will alcohol service be handled for special events? Where will special events be located? The DEIR says that with compliance with the Specific Plan, the alcohol uses would not require any additional approval from City Planning. (DEIR, p. IV.H-30.) What are the requirements of the Specific Plan and how do they differ from the LAMC requirements? Were the potential impacts of those differences in regulations and the alcohol uses assessed in the DEIR? How?

Response to Comment No. 26-128

The proposed Specific Plan would allow for a maximum number of overall alcohol approvals on-site with requisite conditions of approval required for effectuation of each individual approval. The proposed Specific Plan would establish a streamlined alcohol use approval procedure subject to review by the Department of City Planning for up to 10 new establishments offering the sale of a full line of alcoholic beverages for on-site consumption, provided that certain conditions are met. In addition, the proposed Specific

Plan would allow up to two new establishments for the sale of a full line of alcoholic beverages for off-site consumption (e.g., for sale at a retail store), as well as tastings, provided certain conditions are met.” The two off-site alcohol requests are identified to maintain flexibility to provide complementary uses for the proposed public-facing retail square footage identified within the Draft EIR and the proposed Specific Plan. The alcohol regulations are included in the Preliminary Draft Specific Plan and are consistent with the City’s existing regulatory requirements.

Refer to Section IV.H, Land Use and Planning, and Appendix I of the Draft EIR regarding the Project’s consistency with the LAMC.

Comment No. 26-129

As with the Specific Plan, the Sign District document was not provided with the DEIR. The DEIR summarily discusses a broad range of the proposed signage. The detailed regulations of the Sign District must be included in a recirculated DEIR for public review. Were the potential impacts of the signage analyzed in the DEIR? How? What are the impacts from signage on the integrity of the HCM? What are the impacts of lighting and noise from the proposed signage to neighbors? What is the analysis of the Sign District’s consistency with plans, especially the Wilshire Community Plan? The DEIR is so lacking information that it cannot be relied upon for CEQA compliance for the Sign District.

A total of “approximately 31,375 square feet of externally visible, on-site signage” is proposed. (DEIR Page IV.H-31). Why is that an approximation? What is the actually regulated maximum? And why does it specify “on-site signage”; can there be additional off-site signage? Where can the permitted signage be located? At what heights? What types of signs are allowed where? What are the size limitations on each sign type? Is there an overall numeric limit for each sign type? How was the maximum amount of signage determined? How was the maximum 6,100 square feet of signage along Beverly Boulevard determined? Given the supposed limitation on impacting the viewshed to the HCM, will that lead to a greater concentration of signs at the remaining perimeter along Beverly Boulevard? How about the 11,325 square feet on Fairfax Avenue? Or the 10,350 square feet along The Grove Drive? Is there a detailed sign program? The specificity of these numbers suggests there is a detailed sign program that wasn’t included with the DEIR. If so, why not?

Why is “internal” signage based on being below 88 feet in height and 100 feet (or 30 feet) from the property boundary? What does it mean to not be “generally externally visible”? Why is unlimited signage, including digital signage, permitted within 30 feet of the Broadcast Center Apartments as long as it is less than 88’ in height? The Broadcast Center Apartments are approximately 55 feet tall. What is the benefit to the limit of 88 feet? Is there any regulation on the orientation or screening of the interior signs? Any

limitations on the brightness and glare for illuminated interior signs? Were the impacts of unlimited signage analyzed in the DEIR? For example, does the electricity, energy, and GHG sections account for the electricity usage of unlimited signage? Does the Cultural Resources assessment evaluate the impacts to the integrity of the HCM from unlimited signage? How about the impacts to the surrounding historic resources, such as the Beverly Fairfax District, the Gilmore Adobe and the Farmers Market from the proposed signage?

Why is signage on the southern property boundary not limited in the same manner as the other perimeters? Why isn't signage next to the Gilmore Adobe limited? What types and sizes of signs can face the Gilmore Adobe and Farmers Market? Can signs be placed on the proposed parking structure facing the Holocaust Museum and Pan Pacific Park? If so, what is the impact on the Pan Pacific Park and the Holocaust Museum?

What are the definitions of "off-site" and "on-site" signs? Are they the same as defined under the LAMC? If they are different, then the DEIR must be revised to include this information.

Response to Comment No. 26-129

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the EIR disclosed all of the elements of the proposed Sign District required by CEQA, and the Preliminary Draft Specific Plan is not necessary for the environmental analysis of the Project. A Preliminary Draft Specific Plan will be made publicly available on the Department of City Planning's website prior to hearings for the Project.

Refer to Response to Comment Nos. 5-10 and 26-21 regarding the primary physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR and evaluated as part of the land use policy analysis included in Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. The parameters governing maximum signage along the Project perimeter utilize the baseline calculation identified for signage square footages (wall, monument, projecting, etc.) under LAMC Section 14.4.4 in addition to metrics identified for buildings that exceed one story in height (stated within the same section). The overall signage calculation along the Project perimeter was informed by using this code section as a baseline. As part of this calculation, these sign areas were identified as "approximate" to identify that the total area studied ("approximately 31,375 square feet of externally visible, onsite signage," for example) is a cumulative number and may have included fractional quantities that were rounded up to provide a conservative total, for clarity and technical analysis. However, specific dimensional restrictions along the Shared Eastern Property Line near the Broadcast Center Apartments and opposite The Grove Drive from Pan Pacific Park and the Holocaust Museum would be limited to smaller

identification, informational, and directional signs of no more than 25 square feet each and located no more than 15 feet above Project Grade. The Preliminary Draft Specific Plan prohibits digital displays from placement along the perimeter and incorporates the standard illumination limitations identified in LAMC Section 14.4.4. (Refer to the revised Proposed Signage Plan included in revised Figure II-10 in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.) Signage on the southern property boundary, across from the Gilmore Adobe and facing The Original Farmers Market, would be identified within Vertical Sub-District F.1 of the Site Interior. It is defined as signage that is internal to the Project Site and is not located directly along and facing a public right-of-way or within 100 feet from the perimeter along Beverly Boulevard, Fairfax Avenue or The Grove Drive, 30 feet from the Shared Eastern Property Line or the southern property line, or 10 feet from the Southern Shared Access Drive. These interior signs, identified by the commenter, are not intended to be viewed from the public realm (e.g., public right-of-way) at existing grade. In addition, where a portion of said sign's structure could be visible at a specific spot or location along the public realm, the text or graphics included within the signage would not be visible because they are on-site, interior facing signs in keeping with the intent of existing signage currently on-site.

To define and limit these signs, a Vertical Sign Zone (referenced above) has been identified to quantify specific sign types and distinguish sign type based on its location on the façade of a building. Signage located below 88 feet would be governed consistent with those requirements identified for the Project perimeter. Signage located above 88 feet would be limited to wall signs and high rise identification signs. This interior signage would not be limited by total square footage but by location and the ability to view a sign's graphic from outside the Project Site. Digital displays would only be allowed within the Project Site interior as shown in Figure II-8 on page II-517 within Response to Comment No. 5-10, above. The Sign District would impose specific criteria on interior digital displays within 200 feet of the Broadcast Center Apartments. These limitations include a prohibition on digital displays facing any off-site location, including the Broadcast Center Apartments, and a prohibition on the operation of interior digital displays within 200 feet of the Broadcast Center Apartments between the hours of 10 P.M. to 7 A.M. These elements are shown in said Figure II-8. As discussed on page IV.H-31 in Section IV.H, Land Use and Planning, of the Draft EIR, LAMC illumination regulations would apply. No deviation has been requested for the typical signage illumination criteria identified in LAMC Section 14.4.4 within the Project Site interior.

As defined by Section 14.4.2 of the LAMC, an off-site sign is "a sign that displays any message directing attention to a business, product, service, profession, commodity, activity, event, person, institution or any other commercial message, which is generally conducted, sold, manufactured, produced, offered or occurs elsewhere than on the premises where the sign is located." As stated on page IV.H-31 of the Draft EIR, off-site signs would be prohibited throughout the Project Site. The Preliminary Draft Specific Plan

does not permit any off-site signage or propose to alter, change, or modify the definition of an “off-site” sign.

With regard to potential noise impacts related to signage, signage is not a substantial source of noise, and such noise would be associated with the use electricity to light signage or operate digital displays. Furthermore, as discussed above and in Response to Comment No. 5-10, digital displays would be prohibited along the perimeter of the Project Site, and signage facing the Broadcast Center Apartments would be limited to smaller identification, informational, and directional signs. As such, significant noise impacts associated with signage would not occur. Refer to Response to Comment No. 102-6 regarding how electricity use associated with Project signage was accounted for in the energy analysis associated with the Project. Energy use associated with proposed signage was also incorporated into the analysis of GHG emissions associated with the Project. Refer to Appendix FEIR-9 of this Final EIR for these calculations. As concluded in the Draft EIR, Project-related impacts associated with energy and GHG emissions would be less than significant. In response to comments on the Draft EIR, a specific analysis of Project signage was added to the Historic Report (Appendix C.1 of the Draft EIR); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As discussed therein and summarized below, impacts would be less than significant.

As discussed in Section IV.B, Cultural Resources, of the Draft EIR, Historic Sign Guidelines for on-site signage have been prepared by Architectural Resources Group to ensure that all exterior signs located on the Primary Studio Complex and within the Viewshed Restoration Area comply with the Secretary of the Interior’s Standards for Rehabilitation. As such, these guidelines will ensure that any future sign design or modification associated with the Primary Studio Complex will not result in significant impacts to the significance and integrity of the Primary Studio Complex.

The Project also anticipates additional signage associated with new construction outside the Primary Studio Complex and Viewshed Restoration Area, including signage along the Project perimeter facing public rights-of-way. Digital displays would be prohibited along the Project Site perimeter. The anticipated signage will be affixed to new construction only and will not physically alter the Primary Studio Complex or any identified historical resource located in the Project Site vicinity. The addition of new signage does not include the demolition, relocation, rehabilitation, alteration or conversion of the Primary Studio Complex which would remain intact in its current location and would not be materially altered by new signage located on the proposed new construction. The Primary Studio Complex would remain intact and continue to convey its historic significance. For these reasons, the historic significance and integrity of the Primary Studio Complex would not be materially impaired by the Project and the proposed new signage would not result in significant impacts to the Primary Studio Complex.

Similarly, the addition of new signage does not include the demolition, relocation, rehabilitation, alteration or conversion of any identified historical resource located in the Project Site vicinity. All of these resources would remain intact in their current locations and would not be materially altered by new signage located in their larger surroundings. After construction of the Project, all the identified historical resources located within the Project Site vicinity would remain intact and continue to convey their historic significance. For these reasons, the historic significance and integrity of the identified historical resources located within the Project Site vicinity would not be materially impaired by the Project and the proposed new signage would not result in significant impacts to off-site historical resources.

Comment No. 26-130

The DEIR concludes that land use impacts do not vary substantially over the course of a “relatively short time frame. Therefore, a later buildout date would not affect the impacts or significance conclusions.” What was the basis for that conclusion, particularly for a 20-year buildout time frame? That statement is inconsistent with the Project build out for 20 years. The Development Agreement could extend full buildout until 2043. Please clarify how the construction time frame until 2043 is characterized as a “relatively short time frame”? The Land Use analysis must be revised to account for a later buildout date.

Response to Comment No. 26-130

A discussion of potential land use impacts under a long-term buildout scenario is included on page IV.H-57 of Section IV.H, Land Use and Planning, of the Draft EIR. This discussion states as follows:

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

Land use plans and policies remain in place over a long timeframe. For example, the Wilshire Community Plan was adopted on September 19, 2001, and has been the applicable plan for the Wilshire Community Plan area for 22 years. The phrase “relatively short time frames” is referring to the 20-year timeframe of the Development Agreement in relation to the longer-term nature of adopted land use plans, policies, and regulations. This

clarification has been made to the Draft EIR. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 26-131

The DEIR claims that “[t]he Project has been designed to restore views of the [Historic-Cultural Monument] (which are currently obstructed)” on the Project Site (referring to the Primary Studio Complex). (See DEIR, p. IV.H-51.) How can that be the case when Height Zone A permits a 58-foot building in front of the HCM along Beverly Boulevard? How can this be the case when the buildings along Fairfax Avenue can be up to 160 feet? How can this be the case when the conceptual plan shows a building at the corner of Beverly and Fairfax? Please explain how the Project has been designed to restore views of the HCM.

This also is at odds with having a twelve-foot-high security fencing surround the Project Site. (See DEIR, pp. II-22 [“Fencing up to 12 feet in height would be permitted on-site”], IV.H-27 to IV.H-28 [same]; see also *id.*, pp. II-33 [“Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy for certain production activities and ensure pedestrian safety”], IV.H-32 [“Visual screening and fencing would be provided around the entire Project Site perimeter”].) Further, the Specific Plan contains the precise design regulations for fencing (*id.*, p. IV.H-27), but without the Specific Plan itself, the public and decision-makers cannot be informed as to the full impact of the proposed fencing or understand how the fencing would somehow “restore views” of the Primary Studio Complex.

Response to Comment No. 26-131

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 26-19 and 26-45 regarding the regulations and procedures for new construction in the Viewshed Restoration Area and restoration of the historic viewshed along Beverly Boulevard. As discussed on page IV.B-53 of Section IV.B, Cultural Resources, of the Draft EIR, the Project would open the currently obstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised in the past. Views from the public right-of-way along Beverly Boulevard are currently obstructed by security fencing planted with dense shrubs and climbing vines, as well as existing solar canopies and miscellaneous structures. The distinctive entry bridge generally cannot be seen from Beverly Boulevard, and only the very top portion of the Primary Studio Complex is visible. The Project would include more visually transparent fencing along the northern perimeter and height restrictions between Beverly Boulevard and the Primary Studio Complex so that the currently obstructed views

of the Primary Studio Complex, including the main entry bridge, would be restored. As such, the Draft EIR fully describes how the historic viewshed would be restored. Also note that the proposed Specific Plan Design Standards would include a requirement that all fencing be appropriately scaled, designed, and sited to maintain visibility in accordance with the HCM regulations.

Comment No. 26-132

There is no discussion of the potential impacts from the proposed General Plan Amendment to change the General Plan Land Use designation to Regional Center Commercial. The current land use designations are Community Commercial, Limited Commercial, and Neighborhood Commercial. Each designation allows less intensive development than proposed. Changing the Project Site land use designation to Regional Commercial may result in more intensive development on and around the Project Site. What are the consequences from a land use perspective on adjacent sites from changing the land use designation to Regional Commercial?

The DEIR does not explain the difference between the existing and proposed land use designations. Why does the designation need to be changed to Regional Center Commercial? What is permitted by Regional Center Commercial that is not permitted under the existing community plan designations?

Response to Comment No. 26-132

Pages IV.H-43 and IV.H-44 of Section IV.H, Land Use and Planning, of the Draft EIR address the proposed General Plan Amendment to change the three existing General Plan land use designations to a unified Regional Commercial land use designation. Also refer to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial designation.

Comment No. 26-133

The proposed sidewalk widths are not consistent with the Mobility Plan 2035. Why is the Project, with a 25-acre site, not required to provide the additional sidewalk dedication to be consistent with the adopted Mobility Plan? If the additional dedication is not provided, then how is the Project consistent with existing applicable land use plans? Why are dedications provided as easements and not actual dedication? The public sidewalk areas should be dedicated to meet current Mobility Plan standards. Are the public realm improvements conceptual or required? What is actually required?

The proposed vehicular and pedestrian improvements along the shared access drive are inconsistent with the existing use of that private alleyway. Did the DEIR assess the

hazards from pedestrians accessing this private alleyway that has limited visibility and no pedestrian activity today? How did the DEIR assess the increased hazards and other transportation impacts of introduction passenger loading, vehicular access, and truck access to this private alleyway? Given the dimensions and existing use of the alleyway, the Project should not introduce new vehicular, truck, and pedestrian activity to the private alleyway. In addition, the applicant has no ownership or access rights over the western portion of the private alleyway. How will the Project restrict traffic from using the western portions of the alleyway?

Response to Comment No. 26-133

Pages IV.K-55 to IV.K-57 of Section IV.K, Transportation, of the Draft EIR provides a detailed description of the Mobility Plan's ROW requirements and the Project's proposed roadway dedications, mergers, improvements, and waivers of dedication adjacent to the Project Site. As described therein, Fairfax Avenue and Beverly Boulevard currently meet Mobility Plan ROW requirements, but, in some locations, the roadway width exceeds the standard, leaving substandard sidewalks. Therefore, the Project would provide private easements to widen sidewalks and/or parkway areas, as needed, to meet Mobility Plan standards on Fairfax Avenue and Beverly Boulevard. A waiver of dedication would be requested on The Grove Drive to provide a modified ROW resulting in a much wider sidewalk and parkway area than anywhere else along The Grove Drive. Refer to Response to Comment Nos. 16-30, 16-72, 16-76 regarding the Project's pedestrian-oriented design, sidewalk widths, and public realm enhancements and correspondence provided by BOE dated July 14, 2021. Based on the absence of any policies in the Mobility Plan that conflict with the Project, the Project is not inconsistent with the Mobility Plan regardless of any future determination (approval or dismissal) on the proposed waiver of dedication.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, any site plan, including the public realm improvement plans shown in the conceptual plans (Figures IV.H-3 through IV.H-6 in the Draft EIR), in an EIR or other CEQA document is inherently conceptual, and plans are finalized during the building permit process, which occurs after a Project is approved and its EIR certified. Notwithstanding, as discussed in the topical response, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review.

As discussed in Response to Comment No. 9-29, the Project's impacts related to traffic hazards would be less than significant. Vehicles and pedestrians currently have

access along the Southern Shared Access Drive. The Project has joint access rights to the Southern Shared Access Drive, and the two vehicular driveways proposed onto the roadway are in the southeast quadrant of the Project Site. The Project would provide a 10-foot frontage along the Southern Shared Access Drive for sidewalks, screening, and/or planting which would improve pedestrian connections to any new pedestrian gate to the Project Site. Pedestrians would not walk in the existing drive area of the Southern Shared Access Drive, and any pedestrian areas would be plainly marked or on a raised curb and sidewalk, and thereby would be protected from vehicular traffic. Such pedestrian activity would not result in any unusual safety hazard, as the facilities would be comparable to a typical sidewalk along a low-volume street with commercial driveways. The limited amount of Project vehicular activity that would use the Southern Shared Access Drive would be a minor addition to the existing vehicular activity from neighbors to the south and does not pose a new hazard. As shown in Figure 22 on page 80 of Appendix M.1, Transportation Assessment, of the Draft EIR, the Southern Shared Access Drive is only anticipated to serve approximately 55 Project trips in the morning peak hour and approximately 59 Project trips in the afternoon peak hour. This low level of Project activity (less than one vehicular trip per minute) will not burden the operation of the Southern Shared Access Drive. The existing Project driveway on the southwestern corner of the Project Site at Fairfax Avenue has only approximately 28 Project trips assigned to it during the morning peak hour and approximately 30 Project trips in the afternoon peak hour. No Project trips would use the western portion of the private alleyway belonging to The Original Farmers Market especially given the close proximity of the Project driveway immediately to the north.

Comment No. 26-134

The cumulative impacts analysis appears to be limited to related projects through 2026. How were cumulative impacts through full buildout (2043) assessed? Further, the cumulative impacts analysis claims that the related projects and Project would "...provide needed housing and amenities..." What is the support for that conclusion?

Response to Comment No. 26-134

Refer to Response to Comment No. 26-159 regarding the related projects. The Draft EIR's cumulative impact analyses include all known related projects in the vicinity based on information provided by LADOT and the Department of City Planning. This list of related projects is not limited to projects with a buildout year of 2026. Thus, the Draft EIR fully evaluates cumulative impacts based on a list of reasonably foreseeable projects and also includes a specific discussion of a long-term buildout scenario for each of the impact analyses. Additionally, regarding housing and amenities, the commenter is incorrect in stating that the Draft EIR states that the Project would provide needed housing. The full sentence to which the commenter is referring to is included on page IV.H-58 in Section IV.H, Land Use and Planning, of the Draft EIR, which states: "Furthermore, the related

projects and the Project would increase employment opportunities in the Project vicinity, concentrate development near public transit, provide needed housing and amenities, and activate the surrounding area, consistent with local and regional goals and objectives.” As such, the sentence is intended to convey that the Project and related projects would collectively provide these aspects of development. As set forth in Section II, Project Description, of the Draft EIR, the Project does not propose to provide housing.

Comment No. 26-135

I. Noise and Vibration

Noise Sources Must be Modeled at the Pro [sic] Line

The DEIR Noise section seems to assume throughout that certain noise sources are located in specific parts of the property. However, the only Project plan provided was the “conceptual site plan.” Nothing keeps the Project from deviating from the conceptual plan and causing noise impacts inconsistent with the analysis in the DEIR. An assessment of impacts from all noise levels needs to be assumed to occur at the property line, unless there are enforceable limitations in the Specific Plan to otherwise restrict the noise sources. As no such limitations are included in the DEIR, it must be assumed that the noise sources could be adjacent to the property line and in proximity to the offsite noise sensitive receptors. Did the noise model of the Project sources assume the noise sources at the property line?

For instance, the DEIR does not disclose the assumed distance between the sensitive uses and outdoor gatherings. Since outdoor gatherings could occur at any location, the noise analysis should have assumed that the noise from such activities would occur at the property line. The DEIR instead appears to have assumed outdoor gatherings at specific locations throughout the Project Site. Will the Specific Plan restrict outdoor gatherings to these locations? Also, the DEIR Noise section states that parking may be located in an above-ground parking structure at the southeastern portion of Project Site. The DEIR again appears to refer to the location in the conceptual site plan. There does not appear to be any limitation on the location of the parking structure. Therefore, the analysis of noise impacts from the above-ground parking structure needs to be modeled as close to the offsite sensitive uses as it is permitted to be developed. The same should be done with other noise producing activities, such as loading activities, mechanical activities, production areas and basecamp, generators, mills, etc. Please provide this data so that the public and decision-makers may be fully informed of the Project’s potential noise levels at nearby sensitive uses.

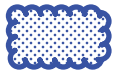
Response to Comment No. 26-135

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-5, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR.

The noise analysis in the Draft EIR was performed based on the proposed development program shown in Figure II-4, Conceptual Site Plan, of the Draft EIR as well as conservative assumptions. As discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, a discretionary review process (which includes potential subsequent CEQA compliance review) for future changes that are substantially different than the Conceptual Site Plan. The noise analysis assumed implementation of the frontage areas and building stepbacks shown in Figure II-5, Height Zone Map, of the Draft EIR. Between the required 30-foot frontage area along the Shared Eastern Property Line plus the Broadcast Center Apartment building's existing setback of approximately eight feet, there would be approximately 38 feet separating Broadcast Center Apartments from any new building. Outdoor roof deck gathering spaces are evaluated on pages IV.I-45 through IV.I-47 of the Draft EIR. As discussed therein, the maximum number of persons that could occupy outdoor roof deck gathering areas would range from approximately 270 to 1,200 persons (based on an occupancy load of 15 square feet per person).

The Draft EIR conservatively analyzed this occupancy level based on a total of 5,000 persons gathering throughout the outdoor roof deck gathering areas at any given time and concluded that impacts from use of these outdoor areas would be less than significant (refer to Table IV.I-13 of the Draft EIR). Additional noise analysis was also conducted in response to this comment conservatively assuming that 1,200 persons could gather at each of the deck locations shown in Figure II-9 on page II-737, and this analysis demonstrates that impacts would continue to be less than significant. Refer to the worksheets included as Appendix FEIR-16 of this Final EIR (beginning on page 61) for the informational analysis in response to this comment.

In addition, note that Project Design Feature NOI-PDF-4 establishes the noise limits for any amplified sound system for outdoor gatherings on roof decks so as to not exceed the City's noise limit (i.e., an increase of 5 dBA above the ambient noise level) at any off-site noise-sensitive receptor location. With regard to noise from mechanical equipment, as discussed on page IV.I-43 of the Draft EIR, new mechanical equipment (e.g., air ventilation equipment) would be located at the roof level and/or within each of the building structures (e.g., garage exhaust fans). As further discussed therein, the Project would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, with



Potential on-site outdoor roof decks locations.
Assumed up to 1,200 people at each area.¹



Potential on-site above-grade parking structure. Assumed up to 2,322 parking spaces at the above grade parking structure.²



Potential on-site surface parking lots. Assumed up to 40 parking spaces at each of the surface parking lots.²

Notes:

1. Project Draft EIR, Page IV.I-45.

2. Appendix J of the Draft EIR, pdf page 164.

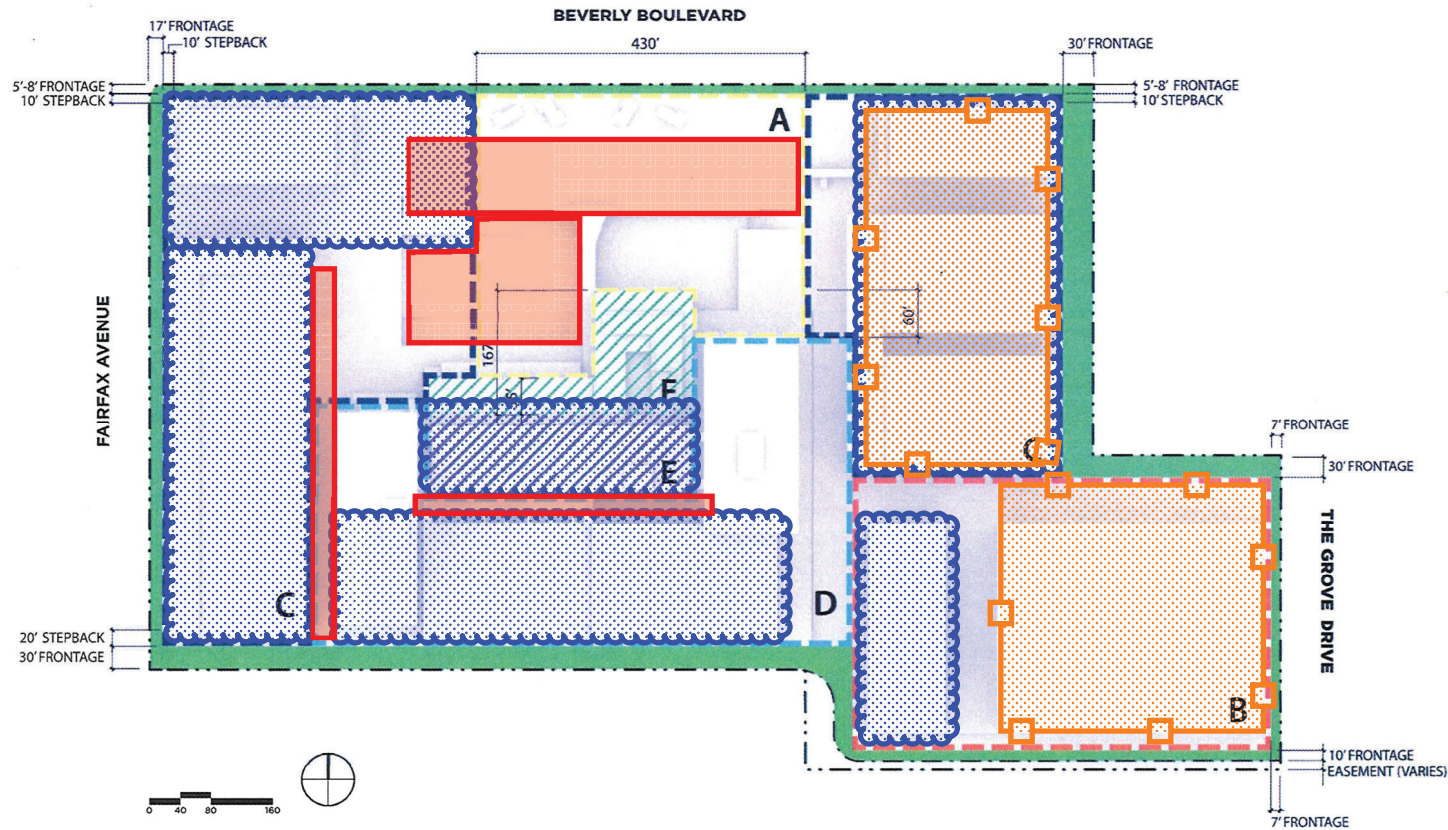


Figure II-9

On-site Noise Sources – Roof Decks and Parking Areas

Project Design Feature NOI-PDF-3, all outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors. As such, as shown in Table IV.I-12 of the Draft EIR, noise impacts associated with the outdoor mechanical equipment would be less than significant.

Noise related to parking facilities is addressed on pages IV.I-46 and IV.I-1-48 of the Draft EIR. As discussed therein, the analysis assumed that parking spaces would be located within an underground parking level, an above-ground parking structure (located at the southeastern portion of the Project Site), and/or surface parking throughout the Project Site. As shown in Table IV.I-14 of the Draft EIR, impacts were concluded to be less than significant. Also note that noise impacts would remain less than significant if the parking structure were to be located along the eastern perimeter of the Project Site, where the 30-foot frontage area would separate the structure from the Shared Eastern Property Line. Refer to the worksheets included as Appendix FEIR-16 of this Final EIR (beginning on page 78) for the informational analysis in response to this comment and to Figure II-9 on page II-737 for the potential parking locations that were evaluated.

The evaluation of noise impacts from loading activities is provided on pages IV.I-46 through IV.I-49 in Section IV.I, Noise, of the Draft EIR. Loading activities were assumed to be located along the perimeter of the Project Site and adjacent to a sound stage, to provide a conservative noise analysis. The estimated noise levels were calculated with the assumption that up to 60 truck loadings and two trash compactors would operate concurrently to represent a conservative noise analysis. As presented in Table IV.I-15 in Section IV.I, Noise, of the Draft EIR, the estimated noise levels from loading and trash compactors would be below the significance threshold at all off-site sensitive receptors. In addition, noise levels associated with loading activities would be consistent with the existing loading operations as the loading activities would be located at similar distances from the off-site receptor locations.

With regard to noise associated with outdoor production activities, as discussed on pages IV.I-44 and IV.I-45 of the Draft EIR, the overall amount of outdoor area used for studio production activities during Project operation would be reduced as compared to existing conditions due to the development of new buildings and parking facilities throughout much of the Project Site. Specifically, the total outdoor area used for studio production activities would be reduced by approximately 10 percent from 651,849 square feet (existing condition) to 585,902 square feet (future Project condition). In addition, the existing outdoor area (i.e., basecamp) adjacent to the Broadcast Center Apartments would be reduced from approximately 77,000 square feet (existing condition) to approximately 56,500 square feet (future Project condition), an approximately 27-percent reduction. Therefore, noise levels associated with outdoor studio production activities would be expected to be somewhat lower than under existing conditions. Furthermore, in accordance with Project Design Feature NOI-PDF-5, outdoor production activities will

continue to be prohibited within 200 feet of the Shared Eastern Property Line and receptor location R1 between the hours of 10 P.M. and 7 A.M. Also refer to Response to Comment No. 26-146 for a quantitative analysis confirming this conclusion.

In summary, the analysis of onsite noise sources included in Section IV.I, Noise, of the Draft EIR is based on the proposed development program and Conceptual Site Plan. The noise analysis accounts for onsite uses that would occur at the perimeter of the Project Site. Furthermore, as noted above, a discretionary review process (including potential subsequent CEQA compliance review) would be required for future changes that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR.

Comment No. 26-136

The DEIR Does Not Consider All Feasible Mitigation Measures

The DEIR did not explore all feasible mitigation measures to minimize impacts to various sensitive receptors. For mitigation measures implemented, the DEIR failed to adequately analyze the extent of mitigation measure feasible.

For example, Mitigation Measure NOI-MM-1 states that a temporary and impermeable sound barrier will be erected at various locations to mitigate on-site construction noise. However, noise impact to sensitive receptor R1 was not decreased to below thresholds because reducing construction-related noise levels at the upper levels of the residential building up to five-stories would require temporary noise barriers to be as high as the building, which would apparently not be feasible. Here, a blanket statement is made that it would not be feasible to do so, but no evidence or explanation is provided. The Alternatives section purports to evaluate additional noise mitigation and concludes that a 30-foot sound wall 100 feet from the eastern property boundary would not be feasible because, in part, it would block views and sunlight for residential units. However, the Project would permit 160-foot buildings in closer proximity to the residential units. Either the Project should not be permitted to build an 160-foot building there or the 30-foot sound wall is feasible. The DEIR should include sound mitigation above what is provided in NOI-MM-1. Also, the DEIR should explore alternate mitigation measures such as silent construction equipment and more effective noise muffling devices. See below for additional feasible mitigation measures.

The DEIR also wrongly concludes that there are no feasible mitigation measures for areas impacted by hauling. Are there not other staging areas away from sensitive uses that could be used? These alternative locations should have been identified and analyzed.

The DEIR also wrongly concludes that there is no mitigation measure for human annoyance from vibration. Creating a construction buffer zone—an area along the property line in which no vibration generating activities could occur—would mitigate vibration impacts from on-site construction activities. The Alternatives section states that moving construction activities using heavy equipment at least 80 feet westerly from the Shared Eastern Property would reduce vibration impact to less-than-significant level, but states that this would be infeasible because it would render a substantial portion of the Project Site undevelopable. The DEIR fails to explain why a significant vibration impact for the long construction period is preferable over an 80 feet buffer on a site of more than a million square feet. Also, the DEIR fails to discuss the feasibility of having a construction buffer of less than 80 feet. At least some construction buffer is feasible; however, this mitigation was completely dismissed. As a feasible mitigation measure, it must be implemented to reduce the vibration impacts to less than significant.

Response to Comment No. 26-136

As discussed in the Draft EIR, the Project would have the potential to result in temporary significant construction noise and vibration impacts. As provided in Mitigation Measure NOI-MM-1, the Draft EIR specified that the Project would provide, among other noise barriers, an approximately 16-foot-high temporary noise barrier along the Shared Eastern Property Line to reduce the construction noise levels to the extent feasible. As shown in Table IV.I-19 on page IV.I-58 of the Draft EIR, with Mitigation Measure NOI-MM-1, the construction noise impacts would be reduced to a less-than-significant level at all offsite noise-sensitive receptors, with the exception of receptor location R1. There are 48 apartment units that face the Project Site along the Shared Eastern Property Line. Due to the height of receptor location R1 (a five-story building), it would not be feasible to construct a temporary wall high enough to eliminate the construction noise at the upper levels of the affected receptor. Table II-25 on page II-741 presents the estimated noise reduction at the receptor location R1 with various sound barrier heights. As shown in Table II-25, a 16-foot-high sound barrier would provide a reduction of 16 dBA at Level 1; however, this barrier would not provide any noise reduction at upper levels. Thus, as part of this Final EIR, in response to this and other public comments, Mitigation Measure NOI-MM-1 has been revised to provide for a 30-foot high noise barrier along the Shared Eastern Property Line. While a 30-foot-high barrier would not substantially reduce noise at Levels 4 and 5, this barrier would provide a substantial reduction of 16 dBA at Levels 1 and 2, and 5 dBA at Level 3. A 50-foot-high barrier would provide a reduction of 16 dBA at Levels 1, 2, 3 and 4 and 8 dBA at the top Level 5. However, as stated by AECOM Hunt in the Noise Memo included as Appendix FEIR-17 of this Final EIR, installing a 50-foot-high temporary wall is not a financially or logistically practical solution and would be extremely difficult to implement. At 50 feet in height, there is a significant increase in wind loading, which typically requires lateral bracing. Lateral bracing at this location is not possible to install due to the footprint of the new construction and the location of the existing Broadcast

Table II-25
Sound Barrier Noise Reduction at Receptor R1 (the Broadcast Center Apartments)

Building Level	Estimated Sound Barrier Noise Reduction with Various Heights, dBA		
	16 Feet High	30 Feet High	50 Feet High (not feasible) ^a
Level 1	16	16	16
Level 2	0	16	16
Level 3	0	5	16
Level 4	0	0	16
Level 5	0	0	8
^a Per AECOM, it is not feasible to provide a temporary 50-foot-high temporary construction noise barrier. Refer to Appendix FEIR-17 of this Final EIR. Source: AES, 2023			

Center Apartment building. In addition, the lateral bracing, even if possible, would interfere with the construction sequencing requiring a complicated phased installation and removal. The added complexity would inhibit construction progress in this vicinity causing the overall construction duration to lengthen considerably.⁵⁸

Refer to Appendix FEIR-8 for a detailed list of the construction assumptions, including specific types of equipment provided by AECOM for use in the Draft EIR. Noise and vibration impacts associated with the installation and removal of the temporary 30-foot-high temporary wall would include a subset of the pieces of equipment evaluated as part of the grading/excavation phase for the Project. In addition, a 30-foot-high noise barrier is estimated to require several days for installation. As such, noise and vibration impacts associated with the installation and removal of the temporary 30-foot-high noise barrier would be within the envelope of construction impacts disclosed in the Draft EIR.

As noted by the commenter, an alternative was evaluated to determine whether the construction noise could be reduced to a less-than-significant level at receptor location R1. In order to reduce construction-related noise at R1 to a less-than-significant level, development would need to be moved a minimum of 100 feet west of the Shared Eastern Property Line together with a 30-foot-high noise barrier. However, as discussed in the Section V, Alternatives, of the Draft EIR, it would be cost prohibitive to implement a 100-foot construction setback that would render a substantial portion (approximately 83,513 square feet or 1.9 acres) of the Project Site undevelopable.

⁵⁸ AECOM Hunt, TVC 2050 Project, Noise Public Comments, Memo dated August 16, 2023 (Appendix FEIR-17 of this Final EIR).

The commenter suggests use of “silent” construction equipment; however, such construction equipment is not commercially available. Refer to Response to Comment No. 26-137 regarding use of electric equipment to reduce construction noise. In addition, the commenter’s suggested construction equipment with muffling devices has already been incorporated into Project Design Feature NOI-PDF-1, which requires power construction equipment to be equipped with state-of-the-art noise shielding and muffling devices.

As analyzed in the Draft EIR, the estimated offsite noise levels due to construction haul trucks during site grading would exceed the significance threshold by approximately 0.5 dBA along Fairfax Avenue. This is the only segment of the approved haul routes where a significant impact would temporarily occur during grading activities. As provided in the Draft EIR, conventional engineering mitigation measures, such as temporary noise barriers, would reduce the offsite construction truck traffic noise. However, it would not be feasible to construct barriers along Fairfax Avenue as the barriers would obstruct access and visibility to the properties along this haul route. Please refer to Response to Comment No. 26-24 regarding the construction staging areas. As discussed therein, the two offsite staging areas have been eliminated and all construction haul truck staging would occur within the Project Site.

With regard to vibration associated with human annoyance at off-site receptors, as analyzed in the Draft EIR, the estimated vibration levels due to on-site construction equipment would exceed the significance threshold at receptor location R1. The impacts would occur when heavy construction equipment (e.g., large bulldozers, caisson drilling, and loaded trucks) operate within 80 feet of the affected building. As discussed in Section V, Alternatives, of the Draft EIR, providing an 80-foot buffer zone to reduce the temporary construction vibration impacts would render a substantial portion of the Project Site (approximately 1.5 acres) undevelopable, and, therefore, it was considered infeasible. A reduced buffer zone that leaves a portion of the Project Site undevelopable would also not be practical or reasonable. Furthermore, construction activities within 80 feet of receptor location R1 would be temporary and would cease once heavy construction (with the use of heavy construction equipment; e.g., drill rig and large bulldozer) during the site grading/excavation within that area of the Project Site is complete.

Comment No. 26-137

Additional Mitigation Should be Required

The DEIR’s proposed mitigation measure is inadequate to substantively reduce the impacts associated with the proposed Project’s construction. The DEIR should evaluate the following additional mitigation measures:

- Construction contractors shall schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high-noise-level emitting equipment.
- Construction equipment staging areas shall be located as far as feasible from residential areas. The Alternative section discusses that construction activities would need to be moved approximately 700 feet westerly from the Shared Eastern property line for a less than significant impact, and that such a measure would be infeasible because development could not occur on over half of the Project Site. However, the DEIR fails to analyze the effect of distances less than 700 feet in conjunction with other mitigation measures listed here.
- Contractors shall place stationary noise sources, such as generators and air compressors, on the Project Site away from affected noise-sensitive receivers. Contractors shall place non-noise producing mobile equipment such as trailers in the direct sound pathways between suspected major noise-producing sources and sensitive receivers.
- The City shall establish a telephone hot-line for use by the public to report any adverse noise conditions associated with the construction of the Project. If the telephone is not staffed 24 hours per day, the contractor shall be required to include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This hot-line telephone number shall be posted at the Project Site during construction in a manner visible to passersby. This telephone number shall be maintained until the Project has been considered commissioned and ready for operation.
- Throughout the construction of the Project, the City shall be required to document, investigate, evaluate, and attempt to resolve all Project-related noise complaints. The City shall be required to:
 1. Use a Noise Complaint Resolution Form to document and respond to each noise complaint;
 2. Conduct an investigation to attempt to determine the source of noise related to the complaint; and
 3. Take all reasonable measures to reduce the noise at its source.

The City shall publish a monthly summary of the status and response to Project-related noise complaints and shall present the report orally to the City Council on a monthly basis. The public shall be given an opportunity to review and submit written and oral comment on the monthly report to the City Council.

- Contractors shall use concrete crushers or pavement saws rather than impact devices such as jackhammers, pavement breakers, and hoe rams for tasks such as concrete or asphalt demolition and removal.
- Contractors shall line or cover hoppers, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces).
- Contractors shall use construction equipment manufactured or modified to reduce noise and vibration emissions, such as:
 1. Electric instead of diesel-powered equipment.
 2. Hydraulic tools instead of pneumatic tools.
 3. Electric saws instead of air- or gasoline-driven saws.
- All impact tools should be shrouded or shielded.
- Construction equipment shall not be idled for extended periods of time in the vicinity of noise-sensitive receptors.
- Music (i.e., workers' radios) from the construction site shall not be audible at off-site noise-sensitive receptors.

These mitigation measures are feasible and implementable and are not exhaustive of possible mitigation measures. The DEIR should provide additional mitigation for these impacts and describe post-mitigation conditions.

Response to Comment No. 26-137

As provided in the Draft EIR (Table IV.I-19), Mitigation Measure NOI-MM-1 would eliminate the construction noise impacts at all off-site sensitive receptors, with the exception of receptor location R1 (the Broadcast Center Apartments). As discussed on page IV.I-56 of the Draft EIR, per Mitigation Measure NOI-MM-1, the sound barrier would provide a minimum 16 dBA noise reduction at the ground level of receptor location R1, which is a substantial noise reduction (an approximately 97-percent reduction in the sound energy). In addition, as discussed in Response to Comment No. 26-136, Mitigation Measure NOI-MM-1 has been revised to require a 30-foot-high sound barrier along the Shared Eastern Property Line, which would further reduce noise levels (up to 16 dBA at Levels 1 and 2 and 5 dBA at Level 3). However, as discussed above in Response to Comment No. 26-136 and in Section V, Alternatives, of the Draft EIR, there are no other feasible mitigation measures that would reduce the noise impact at the upper levels of receptor location R1 to a less-than-significant level. Nevertheless, while not readily

quantifiable, the following suggestions from the commenter have been incorporated into Project Design Feature NOI-PDF-1 to reduce construction noise and vibration:

- Construction contractors will schedule construction activities to avoid the simultaneous operation of construction equipment within 100 feet of receptor location R1 to minimize noise levels resulting from operating several pieces of high-noise-level emitting equipment such as drilling rigs, excavators, and concrete pumps.
- Construction equipment staging areas will be located at least 100 feet from receptor location R1. Contractors will place stationary noise sources on the Project Site at least 100 feet from receptor location R1.
- A telephone hot-line for use by the public will be established to report any adverse noise conditions associated with the construction of the Project. The hot-line telephone number shall be posted at the Project Site during construction in a manner visible to passersby with a minimum spacing of one sign for each 200 feet of the perimeter. In the event that the noise complaint is Project construction-related, the Applicant shall:
 - Document and respond to each noise complaint;
 - Conduct an investigation to attempt to determine the source of noise related to the complaint;
 - Take all reasonable measures to reduce the noise at its source; and
 - Submit a monthly summary report of the Project-related noise complaints to the City Planning Department or Building and Safety.
- Hydraulic tools will be used instead of pneumatic tools within 100 feet from receptor location R1, when commercially available.
- All impact tools will be shrouded or shielded within 100 feet from receptor location R1.
- Construction equipment will not be idled for extended periods of time (more than 5 minutes) within 100 feet of receptor location R1, as specified by CARB.
- Music (i.e., workers' radios) from the construction site will not be audible at off-site noise-sensitive receptors.
- Large 40-yard dumpsters will not be located within 200 feet from receptor location R1 (the Broadcast Center Apartments); or, if located within 200 feet of receptor location R1, a sound barrier blocking the line-of-sight to the dumpster from receptor location R1 shall be required.

- Within 100 feet from any sensitive receptor location, the Project would utilize electric or battery powered construction equipment for the following pieces of equipment: tower cranes; mounted placing booms; scissor lifts; welding machines once permanent power is in place; swing stages; light towers for limited durations; concrete saw; and some light material forklifts (except for heavy material lifting) once concrete is in place.

Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for these revisions. Construction noise levels with the use of electric construction equipment under revised Project Design Feature NOI-PDF-1 would be reduced approximately 2 to 4 dBA.

The request to place non-noise-producing mobile equipment such as trailers in the direct sound pathways between suspected major noise-producing sources and sensitive receptors is not needed, as a construction noise barrier that would be taller than the construction trailers would be located between the Project Site and receptor location R1 as required by Mitigation Measure NOI-MM-1.

The requested use of concrete crushers or pavement saws rather than impact devices such as jackhammers, pavement breakers, and hoe rams for tasks such as concrete or asphalt demolition and removal would not be feasible. Concrete crushers and pavement saws are meant to be utilized in high precision situations and are considered low production tools for smaller jobs. Use of this equipment would substantially extend the duration of demolition activities (i.e., several months) and would substantially increase construction costs.

The requested use of line or cover hoppers, storage bins, and chutes with sound-deadening material (e.g., application of wood or rubber liners to metal bin impact surfaces) would not be feasible for the 40-yard dumpster that is expected to be used onsite. Heavily used hoppers and chutes would quickly erode the sound-deadening materials and require frequent removal and replacement of those materials. The remove/replace process would be constant and time consuming, which would require cessation of the use of such hoppers and chutes that would substantially delay construction progress and dramatically lengthen the overall duration of construction. However, as set forth above, Project Design Feature NOI-PDF-1 has been revised to either prohibit the 40-yard dumpster from being located within 200 feet (a distance greater than 200 feet would have a less-than-significant impact) from receptor location R1 (the Broadcast Center Apartments), or if located within 200 feet of receptor location R1, a sound barrier blocking the line-of-sight to the dumpster from receptor location R1 would be required. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The comment also requests the use of specific construction equipment that is manufactured or modified to reduce noise and vibration emissions (i.e., the use of electrical equipment instead of diesel-powered or gas-powered equipment). The Project's use of diesel equipment would primarily be associated with excavation and shoring activities. Although technology continues to evolve, there is currently no electric/battery powered or hybrid equipment available in the United States for use in the heavy-duty requirements for mass excavation and shoring operations in terms of horsepower, torque, running timing, etc. It is anticipated that as technology improves and regulations change, that equipment manufacturers will generate electric-powered options for fleets in the United States, and California markets will slowly begin to transition large equipment to diesel alternatives. Nonetheless, in response to this comment, the Project would commit to use various types of electric or battery powered equipment as set forth above.

Comment No. 26-138

DEIR Must Analyze Long Term Impacts of Alternative Construction Schedules

Contrary to what is assumed in the DEIR, it is not true that noise impacts would be the same over 20 years as opposed to 32 months. An environment with ongoing construction activities for 20 years is substantially different from one whose noise levels are limited to 2.5 years. An assessment of the effects from long-term noise levels, including health impacts, must be completed for a construction project that could last 20 years.

Response to Comment No. 26-138

As discussed on page IV.I-29 in Section IV.I, Noise, of the Draft EIR, the noise analysis relies upon the threshold questions from Appendix G of the CEQA Guidelines. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. As discussed on page IV.I-35 in Section IV.I, Noise, of the Draft EIR, the Project may occur in one phase, with a total construction period of approximately 32 months. This 32-month construction duration would include overlapping construction stages and thus, the analysis is conservatively based on the peak equipment mix associated with this 32-month construction duration. As discussed on page IV.I-29 in Section IV.I, Noise, of the Draft EIR, per the 2006 L.A. CEQA Thresholds Guide, for construction activities lasting more than 10 days, the corresponding significance criterion to be used in the construction noise analysis is when the Project-related construction noise exceeds the ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise sensitive use. As shown in Table IV.I-10 in Section IV.I, Noise, of the Draft EIR, this significance threshold was used for the construction noise analysis for the Project. As discussed on pages IV.I-38 to IV.I-40 in Section IV.I, Noise, of the Draft EIR, to present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously at the

construction area nearest to the sensitive receptors. These assumptions represent a conservative noise scenario because construction activities would typically be spread out throughout the Project Site, and, thus, some equipment would be farther away from the sensitive receptors, which increases buffer zones and/or reduces sound levels of construction equipment due to distance attenuation and intervening buildings. In addition, the noise modeling assumes that the construction noise would be constant, when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities as equipment is often idle, or powering up or down.

In addition to the 32-month buildout scenario, the Draft EIR also addressed noise impacts for a 20-year buildout scenario. Refer to Response to Comment No. 9-24 regarding the construction timeline. As explained throughout the Draft EIR, while Project buildout is anticipated in 2026, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. Under the long-term buildout schedule, construction activities within the Project Site would not be continuous for the entire 20-year duration. Rather, once completed, construction would move to a more distant location, which would further reduce the construction noise due to distance attenuation. In addition, once intervening buildings are constructed between the off-site sensitive receptors and construction areas, construction noise would be further attenuated. As such, the noise impacts at a noise sensitive receptor under long-term buildout of the Project would be similar to that of the anticipated 32-month build out schedule when construction activities occur adjacent to the sensitive receptor and less than that of the 32-month build out schedule once intervening buildings are constructed.

As stated on page IV.I-68 in Section IV.I, Noise, of the Draft EIR, a later buildout date would not increase the construction noise impacts or change the significance conclusions for the 32-month build out scenario, as such impacts are not dependent upon buildout year. Furthermore, as stated previously, based on the 2006 L.A. CEQA Thresholds Guide, construction noise impacts are analyzed and measured based on a peak hour for each construction stage rather than duration. With respect to potential noise impacts on human health, the City of Los Angeles currently has not set specific noise limits beyond the City's Noise Regulations (LAMC Chapter XI). However, there are varying effects of noise and associated standards and metrics set forth by agencies to address such effects. For example, the United States Occupational Safety and Health Administration (OSHA) and the State's Division of Occupational Safety and Health (also known as Cal/OSHA) have adopted regulations designed to protect workers against the effects of occupational noise exposure. Per Cal/OSHA, the permissible noise exposure for 8 hours would be 90 dBA (L_{eq}).⁵⁹ In addition, as provided in Table IV.I-19 in Section IV.I,

⁵⁹ California Code of Regulations, Section 5096, Exposure Limits for Noise, Table N-1 Permissible Noise Exposure.

Noise, of the Draft EIR, the estimated noise levels from the Project construction would be well below the Cal/OSHA permissible noise exposure level. In addition, the USEPA has identified a 24-hour exposure level of 70 dBA (environmental noise) to protect potential hearing loss. This USEPA recommended noise level includes a margin of safety and is based on steady noise exposure of 24 hours per day over a period of 40 years.⁶⁰ However, the Project would not expose people to noise levels above 70 dBA for an extended duration of 40 years. Thus, the Project would not exceed the USEPA identified level for protection of potential hearing loss.

Comment No. 26-139

The DEIR Fails to Adequately Analyze Impacts to the Gilmore Adobe

The DEIR did not analyze noise impacts to the Gilmore Adobe, which is the closest sensitive use south of the Project. Ambient noise levels were also not taken in the area.

NOI-PDF-5 prohibits outdoor production activities within 200 feet of the Shared Eastern Property Line adjacent to R1. Why is this PDF not applied to the southern property line adjacent to the residences at the Gilmore Adobe? There is no analysis of how studio-related production will impact the Gilmore Adobe. In addition, a construction sound barrier is not proposed between the Project and Gilmore Adobe. The DEIR needs to be revised with an assessment of construction and operational noise impacts on the Adobe and appropriate mitigation measures identified.

The DEIR's calculations regarding vibration impacts of the large bulldozer to the Gilmore Adobe is questionable. The DEIR should disclose how close the bulldozer will be to the Gilmore Adobe. On Table IV.I-20, a large bulldozer generates 0.114 PPV at R1, but only 0.011 PPV at the Gilmore Adobe, which is a much more sensitive structure. The DEIR should clarify the reason for such a calculated reduction in offsite vibration levels at the Adobe.

The DEIR presents no information on the long-term effects that construction and production-related vibrations may have on the structural integrity of the historic Adobe. The DEIR should demonstrate the Gilmore Adobe will not be susceptible to future damage as a result of construction and/or production activities. The Project should include a mitigation measure requiring ground motion monitoring during construction and operations, and require that construction immediately cease upon the detection at the southerly property line of any ground motion exceeding 0.01 mm/s.

⁶⁰ USEPA, Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise, October 1979, revised July 1981, p. 2-21.

Additionally, the DEIR does not evaluate human annoyance that might be experienced at the Gilmore Adobe. This oversight is a significant omission as the Gilmore Adobe is the closest residence to the south. The DEIR should be recirculated for public comment with this information since the DEIR already predicts that vibration levels at the R1 site will exceed the threshold for human annoyance.

Response to Comment No. 26-139

As discussed in Section IV.B, Cultural Resources, of the Draft EIR, the Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a historical resource and potential impacts to the Gilmore Adobe as a historical resource have been fully evaluated in the Draft EIR, including potential impacts associated with vibration during construction activities. The Gilmore Adobe would be located approximately 167 feet from the nearest buildings within the Project Site and approximately 125 feet from the nearest construction activities southerly to the north. The Gilmore Adobe is also separated from the Project Site by one and two-story support buildings and an approximately 28-foot-wide service alley. To evaluate potential vibration impacts to the Gilmore Adobe, Section IV.I, Noise, of the Draft EIR used the most stringent criterion of 0.12 PPV for “buildings extremely susceptible to vibration damage” from the FTA. This criterion is even more stringent than FTA’s 0.20 PPV criterion for “nonengineered timber and masonry buildings.” As shown in Table IV.I-20 of the Draft EIR, the maximum vibration level associated with construction equipment would be 0.011 PPV, which is well below the 0.12 threshold for building damage for the most stringent FTA threshold of 0.12 PPV. Furthermore, the estimated maximum vibration level at the Gilmore Adobe (0.011 PPV) would be well below Caltrans’ most stringent vibration criterion of 0.08 PPV, applicable to “extremely fragile historic buildings, ruins, ancient monuments.” Accordingly, the Draft EIR concluded that potential vibration impacts during Project construction pursuant to the significance criteria for building damage would be less than significant. Therefore, the requested vibration monitoring for the Gilmore Adobe during construction is not required under CEQA. Generally, vibration monitoring would be provided when the estimated vibration levels would be near or would exceed the vibration threshold (i.e., 0.12 PPV for buildings extremely susceptible to vibration damage). Also note that the estimated vibration levels at receptor location R1 are higher than at the Gilmore Adobe because receptor location R1 would be located approximately 20 feet from construction equipment as shown in Table IV.I-20 in Section IV.I, Noise, of the Draft EIR, which is much closer when compared with the distance of construction equipment to the Gilmore Adobe. In addition, the vibration significance threshold for building damage at the Gilmore Adobe of 0.12 PPV is more stringent than the 0.50 PPV (FTA criterion for reinforced concrete, steel, or timber buildings) threshold used for receptor location R1.

The comment that the Gilmore Adobe is a residential use is incorrect. Per the 2018 book, *A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company*, which was written by the A.F. Gilmore Company, the Gilmore Adobe has been

home to the corporate offices of the A.F. Gilmore Company since 1976 (see page 59 therein). This is consistent with the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project, which identified the Gilmore Adobe as a commercial office use.⁶¹ Accordingly, the Draft EIR identified and analyzed the Gilmore Adobe as a commercial use. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA.⁶² Nonetheless, in response to this comment, Mitigation Measure NOI-MM-1 in Section IV.I, Noise, of the Draft EIR has been revised to include a sound barrier along the southern property line that would provide a minimum 15 dBA noise reduction at the ground level of the Gilmore Adobe. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Thus, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with Project construction at the Gilmore Adobe would be less than significant. Specifically, the Gilmore Adobe would be shielded from noise from Project construction activities due to the presence of the existing commercial buildings located to the north of the Gilmore Adobe and the concrete walls located along Gilmore Adobe northern/eastern property line. The estimated maximum noise levels due to construction activities at the Gilmore Adobe would be approximately 74.4 dBA (L_{eq}), which would be approximately 13.5 dBA above the significance threshold (ambient plus 5 dBA). This is a conservative analysis as it assumes all construction equipment would operate at the southeast portion of the Project Site, approximately 125 feet from the Gilmore Adobe. As such, the proposed sound barrier with a 15 dBA noise reduction would reduce noise levels to less than 5 dBA above ambient, which would be a less-than-significant impact if the Gilmore Adobe were treated hypothetically as a residential use.

With regard to Project operational noise at the Gilmore Adobe, as discussed above, the Draft EIR identified and analyzed the Gilmore Adobe as a commercial use, and a commercial use is not a sensitive receptor for purposes of the operational noise analysis under CEQA. Nonetheless, as discussed on pages IV.I-44 and IV.I-45 of the Draft EIR, the overall amount of outdoor area used for studio production activities during Project operation would be reduced as compared to existing conditions due to the development of new buildings and parking facilities throughout much of the Project Site. Therefore, noise levels

⁶¹ The Grove at Farmers Market Addendum to Final Environmental Impact Report dated July 15, 1999 (EIR No. 87-515-SUB(ZV)(YV)(ZC); State Clearinghouse No. 87102102).

⁶² The L.A. CEQA Thresholds Guide states that noise-sensitive uses include residences, transient lodgings (hotels), schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks (City of Los Angeles, L.A. CEQA Thresholds Guide, p. I.1-3). Similarly, the City of Los Angeles General Plan Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks (Noise Element, City of Los Angeles General Plan, Chapter IV, p. 4-1). These uses are considered more sensitive to noise than commercial and industrial land uses.

associated with outdoor studio production activities would be expected to be somewhat lower than under existing conditions at all off-site areas. Also refer to Response to Comment No. 26-146 for a quantitative analysis of outdoor production activities that confirms this conclusion. Note that if the Gilmore Adobe were treated hypothetically as a residential use, Project operational noise sources (including building mechanical, outdoor spaces, loading docks, trash compactors, and parking facilities) would not generate noise levels at the Gilmore Adobe that would exceed the significance threshold (ambient plus 5 dBA) as set forth in the worksheets included as Appendix FEIR-16 of this Final EIR (page 85).

With regard to vibration related to human annoyance at the Gilmore Adobe, as discussed above, the Draft EIR identified and analyzed the Gilmore Adobe as a commercial use, and a commercial use is not a sensitive receptor for purposes of the vibration analysis associated with human annoyance under CEQA. Even if the Gilmore Adobe were treated hypothetically as a residential use, vibration levels associated with human annoyance from the Project would not exceed the significance threshold at the Gilmore Adobe. Specifically, vibration levels at the Gilmore Adobe due to Project construction activities would range from approximately 37 VdB (small bulldozer) to 66 VdB (large bulldozer), which would be well below the 72 VdB significance threshold (for a residential use). Furthermore, operation of the Project would not generate any new sources of vibration that would not already be present today and as such off-site vibration levels at the Gilmore Adobe due to Project operations would not increase beyond existing conditions.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-140

The DEIR Failed to Adequately Analyze Impacts to R1

The DEIR failed to adequately analyze impacts to the multi-family residential property at the shared eastern property line (R1).

First, on Table IV.I-10, R1 is assumed to be 20 feet away from construction activity. What is the basis for assuming this distance? If the construction will occur immediately at the Project’s property line, R1 should be the distance between the property line and the closest exterior wall, including balconies, of the adjacent apartment. The DEIR should substantiate the accuracy of this assumption or redo the noise analysis consistent with the accurate distance.

Second, how were outdoor studio production activities analyzed? NOI-PDF-5 says “outdoor studio production activities will be prohibited within 200 feet” of the property line with R1 between the hours of 10pm [sic] and 7am. [sic] What does that mean? Exactly which activities will be prohibited? Will production truck travel be prohibited? How will the activities be prohibited? Why is 200 feet the appropriate distance? Why just along the eastern property line? How about the southern boundary with R1? How about relative to the other offsite noise sensitive receptors? Will the activities be allowed between 7am [sic] and 10pm? [sic] What are the impacts from such activities during those hours? The DEIR should disclose the type and frequency of the “outdoor studio production activities” and noise impacts to the sensitive receptors from the activities and then provide for appropriate mitigation as to all the offsite noise sensitive receptors, such as increased setbacks, soundwalls, and limits on operational hours, among other mitigation measures, should be imposed.

Finally, the DEIR does not show how outdoor gatherings would cause a less than significant impact to R1. The DEIR does not commit to specific locations for outdoor gatherings. It is clear that outdoor gatherings at the property line would cause significant noise impacts to R1. Also, the DEIR does not disclose the locations of mechanical equipment with respect to R1.

Response to Comment No. 26-140

The distance between the receptor locations and construction activities used in the noise analysis was based on the anticipated location of the construction equipment operating relative to the receptor location. Based on field observations, receptor location R1 (the Broadcast Center Apartments) is set back approximately eight feet from the Shared Eastern Property Line. While construction equipment would operate near the property line, the main noise source (i.e., internal combustion engine and exhaust) would be set back further. Specifically, engines are often located at the rear of such equipment behind the cab and oriented away from offsite sensitive receptors. For example, while excavators use buckets to perform work near a property line, these involve use of relatively quiet hydraulic cylinders while the engine and exhaust are often 20-30 feet behind the working bucket. In addition, equipment also would not straddle property lines, as a buffer from the property line must be maintained for maneuverability. Furthermore, construction equipment would typically move around on the construction site. Therefore, the 20-foot distance is representative of a conservative estimate of where construction equipment (e.g., an excavator, bulldozer, water truck, drill rig, or crane) would be located closest to receptor location R1 for an extended period of time.

In addition, as discussed on page IV.I-38 in Section IV.I, Noise, of the Draft EIR, to represent a conservative noise impact analysis, the analysis assumed that all pieces of construction equipment would be operating simultaneously and would be located at the

construction area nearest to the sensitive receptors. Furthermore, the noise analysis assumed that the loudest construction equipment would be placed near the perimeter of the Project Site, to further provide a conservative analysis. As provided in Appendix J, Noise Calculations Worksheets, of the Draft EIR, the noise analysis assumed up to 27 pieces of construction equipment operating between 20 feet and 220 feet of receptor location R1, which would likely not occur during actual construction activities.

As discussed on pages IV.I-44 to IV.I-45 in Section IV.I, Noise, of the Draft EIR, outdoor studio production activities currently occur throughout the Project Site. This is depicted in Figure II-3(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Noise sources associated with outdoor studio production activities include, but are not limited to, basecamp activities, setup and take down of production equipment, construction of sets, loading and unloading of production vehicles, vehicular circulation, filming activities, etc. Basecamp is a subset of outdoor production activities. Outdoor studio production activities may occur at any time and any day of the week, including weekends. The studio currently operates 24/7, which would continue with the Project. However, noise generation associated with outdoor studio production activities is currently prohibited within 200 feet of the adjacent multi-family residences to the east of the Project Site (receptor location R1) between 10 P.M. and 7 A.M.

Outdoor studio production activities would continue to occur throughout the remaining portions of the Project Site as shown in Figure II-4(c) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Figure II-4(c) shows that the outdoor production area would be reduced with the Project. As such, as discussed on pages IV.I-44 and IV.I-45 in Section IV.I, Noise, of the Draft EIR, noise levels associated with outdoor production activities would be reduced due to the introduction of new buildings and reduction of outdoor areas used for studio production activities, and impacts would be less than significant. Also note that Project Design Feature NOI-PDF-5 would continue to prohibit outdoor studio production activities within 200 feet of the Shared Eastern Property Line between 10 P.M. to 7 A.M. This PDF is included in Section IV, Mitigation Monitoring Program, along with details about enforcement and monitoring.

The Draft EIR concluded that potential noise impacts during Project operation would be less than significant. Thus, no mitigation measures are required, contrary to the commenter's assertion. Please also refer to Response to Comment No. 26-146 for an additional quantitative noise analysis of the outdoor studio production activities, which confirms that noise impacts associated with outdoor studio production activities would be less than significant at all off-site noise receptor locations.

Please refer to Response to Comment No. 26-135 for further discussion regarding the noise analysis of on-site noise sources, including outdoor gatherings, parking, vehicle

loading, and mechanical equipment. Refer to Response to Comment No. 26-141, regarding noise from on-site vehicles.

Comment No. 26-141

DEIR Also Suffers from Other Inadequacies

In addition to the issues identified above, the DEIR suffers from a number of other inadequacies that must be addressed.

The Project proposes to introduce a new entry point at the Grove Drive. Currently there is not an access point for the property at Grove Drive. What assumptions were made in the roadway noise analysis as to the amount of vehicles and trucks that would utilize the Grove Drive? Do the projected roadway noise levels reflect the maximum amount of Project traffic, including visitors and trucks that can go in and out of the Grove Drive entrance? What were those assumptions? The projected roadway noise levels do not appear to reflect the full extent of Project roadway noise. The DEIR should disclose the percentage of trucks that were assumed to use this entrance, the basis for that assumption, and an accurate assessment of the related noise impacts. The analysis should start with a detailed assessment as to the number of trucks accessing the Project Site. The same analysis should be done for the proposed new entrances off of Beverly Boulevard and the private alleyway.

On Table IV.I-7, a noise model was used for calculating existing vibration levels and not actual measurements. The DEIR should provide evidence that the model provides a valid approximation of existing vibration levels. Actual vibration measurements should have been taken and the analysis should not have relied on a model. Why weren't actual measurements taken?

The additional sound stages will increase the amount of audience visitors to the Project Site. Has the off-site operational noise impacts analysis considered the increased traffic from audience participation on pages IV.I-49–IV.I-56? It is unclear from the section or the appendix whether such numbers are included.

Response to Comment No. 26-141

The transportation noise analysis provided in the Draft EIR was based on the trip volumes from the Project's Transportation Assessment that was approved by LADOT, which is provided in Appendix M.1 of the Draft EIR. The trip data included volumes at each of the Project's entry points, including The Grove Drive. As provided in Topical Response No. 10, Trip Generation, the trip volume data included all Project-related trips, including audience visitor trips, special events trips, and basecamp trips. Therefore, the

transportation noise analysis included the maximum amount of vehicle volumes. The noise analysis evaluated roadway segments surrounding the Project Site, including: The Grove Drive, Beverly Boulevard, and Fairfax Avenue, which represent the roadways with the highest Project-related trip volumes (pages 216–219 of Appendix J of the Draft EIR). The trip volumes along these roadway segments include trips in and out of the Project Site access driveways along The Grove Drive, Beverly Boulevard and Fairfax Avenue.

The percentage of trucks used in the off-site traffic noise analysis is provided in Table IV.I-7 in Section IV.I, Noise, of the Draft EIR. As shown therein, truck trips would represent approximately 3 percent of total vehicle trips accessing the Project Site, which is a conservative assumption as the actual trucks would be less than 3 percent. Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation. Specifically, based on the Project's transportation analysis, under existing conditions there are approximately 78 truck trips (13 heavy truck trips and 65 light truck trips) per day and under future Project conditions there would be approximately 166 truck trips (36 heavy truck trips and 130 light truck trips) per day, which represent approximately 1.2 percent of the total daily trips.⁶³ In addition, the Project-related trucks would normally access the Project Site via the Fairfax Avenue and Beverly Boulevard gates (50 percent per gate). Trucks could access the Project Site via The Grove Drive gate, but only approximately 20 percent of the trucks would use this gate. As provided on page IV.I-49 in Section IV.I, Noise, of the Draft EIR, the Project would result in a maximum noise increase of 1.0 dBA (CNEL) in traffic-related noise along The Grove Drive under Existing Plus Project conditions. The estimated maximum noise levels increase along Beverly Boulevard and Fairfax Avenue would be 0.3 dBA (CNEL) and 0.2 dBA (CNEL), respectively. As concluded on page IV.I-54 in Section IV.I, Noise, of the Draft EIR, noise impacts associated with off-site traffic under Existing Plus Project conditions would be less than significant.

In response to this comment, additional analysis was conducted to specifically account for the noise associated with on-site vehicle movement and to confirm the conclusions in the Draft EIR. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The noise analysis assumed 50 percent of trucks would be traveling along the perimeter of the Project Site to represent a conservative analysis. This is much higher than the actual number of trucks, as only approximately 4 trucks—less than 5 percent of the Project trucks—would use the Beverly Boulevard driveway west of the Broadcast Center Apartments per day, and, as discussed, above approximately 20 percent of the trucks would use The Grove Drive driveway. In addition, to represent a conservative analysis, the noise analysis assumed 50 percent of the 166 truck trips per day would be traveling on the driveway adjacent to the Broadcast Center Apartments, which is significantly higher than the anticipated four trucks (eight truck trips) per day, per the

⁶³ Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation a summary of this data.

transportation analysis (refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation). Furthermore, the noise analysis assumed the trucks would be traveling along the driveways adjacent to the closest noise sensitive receptors, as a conservative analysis. Table II-26 and Table II-27 on pages II-758 and II-759 provide the estimated noise levels under the existing and future conditions, respectively. As shown in Table II-26 and Table II-27, the Project would result in a maximum noise increase of approximately 0.1 dBA and 1.7 dBA at receptor location R1 during the daytime and nighttime hours, respectively. As provided on page IV.I-6 in Section IV.I, Noise, of the Draft EIR, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference. In addition, the estimated noise levels would be below the 5 dBA significance threshold. Thus, the Draft EIR correctly concluded that noise impacts associated with on-site vehicles would be less than significant.

The comment incorrectly references Table IV.I-7 of the Draft EIR for the existing vibration levels. Table IV.I-7, Vehicle Mix for Traffic Noise Model, in Section IV.I, Noise, of the Draft EIR provides the vehicle mix used to calculate transportation noise, which is based on the typical vehicle mix (automobile, medium truck and heavy truck) for a studio, as confirmed by the City and LADOT and discussed above. As described on page IV.I-25 in Section IV.I, Noise, of the Draft EIR, the existing primary source of ground-borne vibration in the vicinity of the Project Site is vehicular traffic. Ground-borne vibration impacts are evaluated based on the anticipated peak levels generated by the vibration sources, e.g., vehicles, and not based on the change in the existing condition (like noise). Therefore, existing ground-borne vibration levels were not measured as suggested by the comment. As discussed on page IV.I-25 of the Draft EIR, the existing ground-borne vibration levels in the vicinity of the Project Site are based on typical levels provided by the FTA for trucks. Vibration levels generated by on-site vehicles, including trucks and passenger vehicles, would be similar to existing conditions, and would include the use of driveways along the Project's perimeter. In addition, as discussed on page IV.I-9 in Section IV.I, Noise, of the Draft EIR, even in locations close to major roads, it is unusual for vibration from vehicular sources, such as rubber-tired buses and trucks, to be perceptible, and ground-borne vibration is not a common environmental effect. Furthermore, the Project will include signage that would limit vehicles driving on-site to 15 mph, which would not generate perceptible vibration levels. As such, vibration levels associated with on-site vehicles would be less than significant at off-site sensitive uses.

Table II-26
On-Site Vehicle Noise Levels—Daytime Hours

Off-Site Receptor Location	Estimated Noise Levels due to On-Site Truck, dBA (L _{eq})		Existing Daytime Ambient Noise Levels, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})		Noise Increase from Existing to Future, dBA (L _{eq})
	Existing	Future		Existing	Future	
R1	59.7	60.1	61.1	63.5	63.6	0.1
R2	47.9	49	62.8	62.9	63.0	0.1
R3	52	47	68.5	68.6	68.5	0.0
R4	44.4	41.4	67.7	67.7	67.7	0.0
R5	44.6	46.7	58.9	59.1	59.2	0.1
R6	25.2	26.2	60.4	60.4	60.4	0.0
R7	45.4	45.3	56.6	56.9	56.9	0.0
R8	48	49.9	66.9	67.0	67.0	0.0
R9 (Gilmore Adobe) ^a	40	40.1	56.0	56.1	56.1	0.0
<p>^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, <u><i>A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company</i></u>, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with on-site construction staging at the Gilmore Adobe would be less than significant.</p> <p>Source: AES, 2023.</p>						

**Table II-27
On-Site Vehicle Noise Levels—Nighttime Hours**

Off-Site Receptor Location	Estimated Noise Levels due to On-Site Truck, dBA (L _{eq})		Existing Nighttime Ambient Noise Levels, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})		Noise Increase from Existing to Future, dBA (L _{eq})
	Existing	Future		Existing	Future	
R1	54.3	57	53.3	56.8	58.5	1.7
R2	41.5	43.4	60.7	60.8	60.8	0.0
R3	46.4	42.6	67.5	67.5	67.5	0.0
R4	38.8	37.5	65.8	65.8	65.8	0.0
R5	38.9	41.7	57.8	57.9	57.9	0.0
R6	20.8	22.9	54.2	54.2	54.2	0.0
R7	40.5	42.1	53.1	53.3	53.4	0.1
R8	44	47.4	65.0	65.0	65.1	0.1
R9 (Gilmore Adobe) ^a	34.5	37.5	52.1	52.2	52.2	0.0
<p>^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, <u><i>A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company</i></u>, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with on-site construction staging at the Gilmore Adobe would be less than significant.</p> <p>Source: AES, 2023.</p>						

Comment No. 26-142

According to p. II-15 of the Project Description, the existing helipad use will be retained in approximately the same location on the Project Site, but at a higher elevation. The noise section provides no detail on existing operation of the helipad or the change in frequency of flights, times of departure or arrivals, or type of equipment employed. What is the existing frequency of flights, times of departure or arrivals, and type of equipment employed for the helipad? What will be the frequency of flights, times of departure or arrivals, and type of equipment employed for the Project helipad use? What are the actual measurements from the current use? How will the increased elevation of the helipad impact noise? In the absence of other substantial evidence, it is reasonable to assume that increased square footage means increased employees and visitors, which equate to more frequent helipad use. The noise impacts of increased helicopter use and the change in helipad location and elevation should be quantified and added to the noise analysis.

Response to Comment No. 26-142

Refer to Response to Comment Nos. 16-87 and 26-15 regarding continued operation of helipad on-site and the reduction in helipad noise levels with placement of the helipad at a higher elevation.

Comment No. 26-143

Table IV.I-19 has errors with units—"Minimum Noise Reduction Provided by Mitigation Measures (feet)." Feet is not a unit of measurement for noise.

On page IV.I-65, the DEIR fails to disclose vibration impacts to the offsite staging areas. It is unclear whether human annoyance was assessed with respect to the school, recreational center, cemetery and church adjacent to the staging area. In addition, for the off-site truck staging location, the existing ambient noise measurements was based on only one measurement taken at 1:00 p.m. However, the truck staging will start much earlier in the day when ambient noise is likely less. Additional ambient measurements should be taken throughout the day, including in the early morning at those staging locations. Impacts from increases in ambient noise during the early morning hours should be assessed and disclosed.

How is it that existing noise level at R1 is considered conditionally acceptable but the noise level at the receptor directly across Beverly Boulevard from R1 is considered conditionally unacceptable? If the existing condition for some residences at the Broadcast Center Apartments represented by R1 are within the range of conditionally unacceptable, wouldn't the impact from mobile noise sources be significant?

Why are the existing ambient noise levels for R1 stated as averages rather than the lowest measured daytime and lowest measured nighttime ambient noise? How would the impacts conclusions be different if compared to the lowest measured ambient noise during daytime and nighttime?

What is the combined composite noise levels from all on-site noise sources compared to ambient noise levels in Leq? Does it exceed 5 dBA over ambient Leq?

Response to Comment No. 26-143

Table IV.I-19 in Section IV.I, Noise, of the Draft EIR has been revised to change "(feet)" to "(dBA)" in the second column. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. This typo does not affect the analysis or conclusions in the Draft EIR.

The analysis in Section IV.I, Noise, of the Draft EIR fully evaluated noise and vibration from the two off-site staging areas and concluded that impacts associated with staging areas would be less than significant (refer to page IV.I-40 and page IV.I-65 of the Draft EIR for the noise and vibration analysis, respectively). Nonetheless, the two off-site staging areas are no longer proposed to be used as part of the Project's construction activities. Instead, all haul truck staging will occur on-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for an analysis of the on-site construction staging areas.

The reason that the existing ambient noise environment at receptor location R1 (conditionally acceptable) is lower than existing ambient noise at other receptor locations along Beverly Boulevard (conditionally unacceptable) is due to the fact that receptor R1 is located further and partially shielded from the vehicle noise along Beverly Boulevard. As shown in Figure IV.I-3 in Section IV.I, Noise, of the Draft EIR, the residential units at receptor location R1 primarily front The Grove Drive.

In the Draft EIR, the ambient noise levels are presented as averaged over the measurement period, per LAMC Section 111.01(a). As such, the noise analysis is consistent with the applicable City noise regulations.

The combined composite noise levels from all onsite noise sources during construction compared to ambient noise levels in L_{eq} are summarized in Table IV.I-10 on page IV.I-39 in Section IV.I, Noise, of the Draft EIR (before mitigation) and Table IV.I-19 on page IV.I-58 in Section IV.I, Noise, of the Draft EIR (after mitigation). With regard to operation, as provided on page IV.I-54 in Section IV.I, Noise, of the Draft EIR, a composite noise analysis was conducted to evaluate operational noise impacts associated with all on-site and off-site noise sources. The composite noise analysis was evaluated using the CNEL noise metric, as specified by the L.A. CEQA Thresholds Guide. The CNEL analysis evaluated noise levels throughout the entire 24-hour day. On-site noise sources would vary throughout the day, and it would not be accurate or consistent with City and CEQA practice to combine noise sources into the hourly L_{eq} metric. Refer to Appendix FEIR-16 for a composite analysis that confirms the Draft EIR's conclusion that noise impacts during Project operation would be less than significant.

Comment No. 26-144

The DEIR acknowledges that ground-borne vibration associated with heavy trucks traveling on road surfaces with irregularities, such as speed bumps and potholes, could reach the perceptible threshold. (DEIR, p. IV.I.-26.) However, the analysis of operational vibration impacts qualitatively states that the primary source of vibration related to operation would include vehicle circulation within the parking facilities and off-site vehicular trips and summarily concludes that vehicular induced vibration is unlikely to be perceptible by

people. (DEIR, p. IV.I-33.) Was the entry/exit and on-site circulation of the production trucks considered in that assessment? How? What assumptions were made as to the amount of trucks and the conditions of the roadway, or the presence of speed bumps or roadway surface traffic/security features considered? Did the DEIR consider how that could create uneven surfaces for truck travel and the related impact on vibration? Did the analysis consider the location of internal truck routes relative to the offsite sensitive receptors? All of these factors need to be disclosed and assessed in the DEIR.

The analysis also summarily says the Project doesn't include land uses that would generate high levels of vibration. Which land uses were evaluated in drawing that conclusion? Were each of the permitted uses identified in the list of uses in the Land Use section evaluated? How? The evaluation of each of the permitted uses should be disclosed.

Response to Comment No. 26-144

As discussed in Section IV.I, Noise, of the Draft EIR, sources of vibration related to operation of the Project would include vehicular circulation, delivery trucks, and building mechanical equipment associated with each of the five permitted studio uses. Based on the land uses described in Section II, Project Description of the Draft EIR and as clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the Project does not include land uses that would generate high levels of vibration. Rather, the proposed land uses represent a continuation of existing studio-related land uses within the Project Site. Land uses that generate high levels of vibration include uses, such as mining, oil drilling, and heavy industrial land uses, and none of the land uses are proposed as part of the Project. Refer to Topical Response No. 3, Permitted On-Site Uses. Vibration levels generated by on-site vehicles, including trucks and passenger vehicles, would be similar to existing conditions, and would include the use of driveways along the Project's perimeter. Even in locations close to major roads, it is unusual for vibration from vehicular sources, such as rubber-tired buses and trucks, to be perceptible, and ground-borne vibration is not a common environmental effect.⁶⁴ In addition, as discussed in Response to Comment No. 26-141, vehicles driving on-site would travel at a controlled slow speed (i.e., 15 mph), which would not generate perceptible vibration levels. As such, vibration levels associated with on-site vehicles would not be perceptible at off-site sensitive uses. Further, building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level) that would include vibration-attenuation mounts to reduce vibration transmission to

⁶⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018, page 112. "...[i]t is unusual for vibration from sources such as buses and trucks to be perceptible...."

ensure that vibration would not be perceptible at the off-site sensitive receptors. Therefore, the Draft EIR correctly concluded that vibration impacts associated with operation of the Project, including on-site vehicles, would be less than significant.

Comment No. 26-145

What is the basis for the construction equipment mix assumptions? How was it determined what distance certain equipment would be from the offsite sensitive receptors? The location of future Project buildings is unknown, so how were these assumptions made? For example, the DEIR says that on demolition, it is assumed that concrete saws will be 45' or 70' from the receptors and excavators will be 20'–120'. On what basis? Won't there be any construction activity adjacent to the property lines? Also, please explain how a reference noise level at 50 feet is used if the distance of the equipment is assumed to be less than 50 feet?

The analysis of noise from parking facilities (DEIR IV.I-46) says that the underground parking would be fully enclosed on all sides; however, the site plans included with the Project application appear to show that the B-1 level parking could be open to the sky. Also, isn't the B1 level at actual grade in the southwest portion of the Project Site? Will all of the underground parking be fully enclosed on all sides? If not, the noise impacts from the open areas of the underground parking should be assessed.

How were the noise impacts from stage loading evaluated? Was it included as a noise source in the assessment of studio-related production noise? Was it included in the assessment of loading dock and trash collection noise? Or was it just not considered?

On what basis does the analysis assume that additional stages do not increase noise because stages are sound insulated. What if sound stage elephant doors are open, particularly when the sets are being constructed? How was the sound from open sound stages, including the sound of set construction equipment and workers yelling over equipment or playing music assessed? Aren't pyrotechnics proposed as an allowed stage activity? Where is the analysis to show that sound insulation is sufficient to fully mitigate pyrotechnic-related noise? As there is no known limitation on the placement of stages and their elephant doors, the analysis must assume that such uses can occur adjacent to the offsite sensitive receptors.

Response to Comment No. 26-145

The construction equipment mix (i.e., construction equipment type and number of pieces of construction equipment) that would be used for each of the anticipated construction phases (i.e., demolition, grading/excavation, mat foundation, structure enclosure, finishing, and landscaping) was provided by AECOM, based on information from

Television City and MBS. Refer to Appendix FEIR-8 of this Final EIR for a detailed list of the construction assumptions provided by AECOM for use in the Draft EIR. The construction noise analysis assumed that the loudest construction equipment would be placed near the perimeter of the Project Site. As noted in Response to Comment No. 26-140, the distance from mobile construction equipment and activities to off-site sensitive receptors would vary based on the phase and activity involved. In general, construction equipment noise would be set back from any property lines, as the main noise source (i.e., internal combustion engines and exhaust) are typically located at the rear of such equipment behind the cab and oriented away from off-site sensitive receptors. In addition, equipment would not straddle property lines, as a buffer from the property line must be maintained for maneuverability. Therefore, the estimated distances evaluated are conservative estimates of where construction equipment (e.g., excavator, bulldozer, water truck, drill rig, or crane) would be located closest to receptor location R1 for an extended period of time.

As described on page IV.I-38 in Section IV.I, Noise, of the Draft EIR, to represent a conservative noise impact analysis, the analysis also assumed that all pieces of construction equipment would be operating simultaneously. As provided on Table IV.I-9 in Section IV.I, Noise, of the Draft EIR, the reference construction equipment noise levels for each equipment type are provided at a distance of 50 feet. The estimated noise level from the construction equipment at a particular receptor location is calculated relative to the reference noise source level at 50 feet distance and the standard sound attenuation rate of 6 dB per doubling of distance (applicable to both conditions where the receptor is located farther or closer than the reference noise source); see page IV.I-32 in Section IV.I, Noise, of the Draft EIR. For example, with the reference noise level of 81 dBA at a distance of 50 feet for an excavator, the noise level for a receptor at 25 feet from the excavator would be 87 dBA [$87 = 81 - 20 \cdot \log(25/50)$].

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR, and the Conceptual Site Plan is based on the architectural plans on file with the City. The underground parking would be enclosed on all sides, with the exception of a portion near the center of the Project Site, which would be partially open to the sky. The noise analysis for the parking areas addresses surface parking areas-grade parking levels, and a below grade (Level B-1) parking area that is partially open to the sky. Table IV.I-14 on page IV.I-48 of the Draft EIR presents the estimated noise levels from the at-grade and above-grade parking levels at the off-site receptor locations. As shown in Table IV.I-14, the estimated noise levels from the parking facilities would range from approximately 24.1 dBA (L_{eq}) at the uses represented by receptor location R6 to approximately 54.5 dBA (L_{eq}) at the uses represented by receptor location R1. The estimated ambient noise levels with the addition of the noise levels generated by the Project parking facilities would be below the significance criterion of 5 dBA (L_{eq}) above the

ambient noise levels (based on the lowest measured ambient noise levels), and, thus, the Draft EIR correctly concluded that noise impacts from parking facilities during Project operation would be less than significant.

As described on pages IV.I-46 to IV.I-48 in Section IV.I, Noise, of the Draft EIR, the noise analysis accounted for noise from on-site loading docks. As discussed in the Draft EIR, loading docks would be located throughout the Project Site in support of production activities. The loading areas would typically be located at the basecamp areas or adjacent to the sound stages. In addition, the noise analysis assumed that up to 60 truck loadings would operate concurrently to represent a conservative noise analysis, as it is unlikely that 60 trucks would load or unload simultaneously. Furthermore, as discussed further below in Response to Comment No. 26-146, in response to comments, additional quantitative noise analysis was conducted for the basecamp and outdoor production activity areas, which included loading/unloading activities. As discussed therein, the analysis confirmed that noise impacts associated with the loading/unloading activities would be less than significant.

Sound stage activities would be contained within enclosed buildings with high sound insulation around the Project Site with operational restrictions on opening doors during production. Therefore, noise levels associated with production inside the sound stages would be contained and would not be transmitted to the exterior. Noise levels associated with production setup inside the sound stage were measured outside of a stage at an existing studio with the elephant door open. These outdoor sound levels from the production setup inside of the sound stages were included as part of the quantitative basecamp and outdoor production analysis described in Response to Comment No. 26-146. Refer to the worksheets included as Appendix FEIR-16 of this Final EIR (page 12) for the measured noise levels at an existing studio and additional confirmatory basecamp and outdoor production noise analysis in response to comments.

With regard to pyrotechnics, note that the Project would not involve the use of pyrotechnics as part of the outdoor production activities.

Comment No. 26-146

The tables show different ambient Leq levels for R1. Which is correct? Does it alter the impacts conclusion?

Did the noise analysis model outdoor production activities? How was it modeled? What was assumed? If not, why not?

The special events traffic noise analysis is purely qualitative and unsupported. Additional information should be provided regarding the permitted special events and the noise

impacts to the surrounding uses disclosed. Such analysis should consider the permitted amount of events, the permitted hours, the maximum amount of attendees, whether amplified sound will be permitted, whether outdoor music will be permitted, etc.

Also, does the cumulative noise analysis include the cumulative noise impacts of special events/gathering space? Do the cumulative noise impacts consider the Holocaust Museum across the street as a related project? Could the projects have simultaneous special events? How was that potential assessed in the cumulative impacts of noise and traffic?

On what basis were the roadway segments selected for the offsite roadway noise analyses?

Response to Comment No. 26-146

The comment does not specify which tables show the different ambient noise levels for receptor location R1. Ambient noise level measurements were conducted for eight receptor locations, and the measured ambient noise levels are provided in Table IV.I-6 on page IV.I-24 in Section IV.I, Noise, of the Draft EIR. Depending on the analysis, the ambient noise levels presented in the other tables throughout Section IV.I, Noise, of the Draft EIR are either the measured daytime or nighttime ambient noise levels, as stated in each of the tables.

As discussed on pages IV.I-44 to IV.I-45 in Section IV.I, Noise, of the Draft EIR, outdoor studio production activities currently occur throughout the Project Site and will continue to occur with the continued operation of the Project Site as a studio. However, the noise levels associated with outdoor studio production would be expected to be lower than the existing conditions, due to the reduction in the outdoor areas used for studio production activities as discussed in Response to Comment No. 26-140.

Nonetheless, in response to public comments, a quantitative analysis of noise levels associated with the outdoor studio production activities, including basecamp operations (which is a subset of outdoor production activities), were analyzed for existing and future conditions. Noise sources associated with outdoor production activities include, but are not limited to, basecamp activities, setup and takedown of production equipment, construction of sets, loading and unloading of production vehicles, vehicular circulation, filming activities, etc. Reference noise levels for these activities were measured at an existing studio. Noise associated with production setup inside a sound stage as measured at the exterior of the sound stage outside of the open elephant door was also accounted for. Hours of operation for outdoor production activities are assumed to be during both daytime hours (7:00 A.M. to 10:00 P.M.) and nighttime hours (10:00 P.M. to 7:00 A.M.). Table II-28 and Table II-29 on pages II-767 and II-768 present the estimated noise levels associated with outdoor

Table II-28
Outdoor Production Activities Noise Levels—Daytime Hours

Off-Site Receptor Location	Estimated Noise Levels due to Outdoor Activities (Basecamp and Outdoor Production), dBA (L _{eq})		Existing Daytime Ambient Noise Levels, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})		Noise Increase from Existing to Future, dBA (L _{eq})
	Existing	Future		Existing	Future	
R1	64.7	58.8	61.1	66.3	63.1	0.0
R2	52.5	54.0	62.8	63.2	63.3	0.1
R3	55.8	48.1	68.5	68.7	68.5	0.0
R4	47.8	41.1	67.7	67.7	67.7	0.0
R5	49.5	49.2	58.9	59.4	59.3	0.0
R6	39.3	36.0	60.4	60.4	60.4	0.0
R7	50.4	50.3	56.6	57.5	57.5	0.0
R8	55.0	53.3	66.9	67.2	67.1	0.0
R9 (Gilmore Adobe) ^a	49.5	42.4	56.0	56.9	56.2	0.0

^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, *A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company*, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with on-site construction staging at the Gilmore Adobe would be less than significant.

Source: AES, 2023.

production and basecamp operations under the existing and future conditions during the daytime and nighttime hours, respectively. This analysis assumes full operation of the outdoor production areas. As shown in Table II-28, the estimated noise levels associated with future outdoor production and basecamp operations during the daytime and nighttime hours would not result in increased noise levels at off-site receptors locations with the exception of receptor location R2, which would result in a maximum noise increase of 0.1 dBA. The estimated noise increases are well below the perceptible level and the 5-dBA significance threshold. Therefore, this analysis confirms the Draft EIR's conclusion that noise impacts associated with the outdoor production activities and basecamp operations would be less than significant.

As described on page IV.I-72 in Section IV.I, Noise, of the Draft EIR, the cumulative noise analysis includes trip volumes under existing conditions and future conditions that account for anticipated future growth, related projects in the vicinity of the Project Site, and Project-generated trips. With regard to the Holocaust Museum, the existing Holocaust Museum was open and operating when the trip counts for the Project were conducted and, therefore, the existing Holocaust Museum trips were included in the analysis. The

Table II-29
Outdoor Production Activities Noise Levels—Nighttime Hours

Off-Site Receptor Location	Estimated Noise Levels due to Outdoor Activities (Basecamp and Outdoor Production), dBA (L _{eq})		Existing Nighttime Ambient Noise Levels, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})		Noise Increase from Existing to Future, dBA (L _{eq})
	Existing	Future		Existing	Future	
R1	53.2	50.9	53.3	56.3	55.3	0.0
R2	42.1	47.2	60.7	60.8	60.9	0.1
R3	51.7	47.9	67.5	67.6	67.5	0.0
R4	46.0	41.0	65.8	65.8	65.8	0.0
R5	49.3	49.2	57.8	58.4	58.4	0.0
R6	38.3	35.9	54.2	54.3	54.3	0.0
R7	50.2	50.3	53.1	54.9	54.9	0.0
R8	54.9	53.3	65.0	65.4	65.3	0.0
R9 (Gilmore Adobe) ^a	48.7	42.1	52.1	53.7	52.5	0.0
<p>^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, <i>A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company</i>, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with on-site construction staging at the Gilmore Adobe would be less than significant.</p> <p>Source: AES, 2023.</p>						

proposed Holocaust Museum project involves minor construction at the existing museum, which the City determined would include a negligible or no expansion of use.⁶⁵ As such, the proposed Holocaust Museum was deemed too small in terms of the generation of additional peak hour trips on the street system by LADOT to include on the list of related projects. Further, the trips for the Holocaust Museum project and for other similarly situated related projects within or even outside the Study Area would be covered by the one percent annual growth rate in ambient traffic assumed in the Draft EIR's transportation analysis.

With regard to special events on-site, refer to Topical Response No. 3, Permitted On-Site Uses regarding how special events would continue to be governed by the LAMC consistent with existing conditions. In addition, cumulative noise impacts associated with

⁶⁵ City of Los Angeles Board of Recreation and Park Commissioners, Board Report No. 22-011, January 20, 2022.

both on-site and off-site noise sources have been evaluated in the Draft EIR (page IV.I-72 and Table IV.I-20) and have been demonstrated to be less than significant.

The roadway segments for the off-site roadway noise impacts analysis were selected based on the proximity to noise-sensitive uses along the roadway segments and potential increases in trips from the Project.

Comment No. 26-147

J. Public Services

The DEIR's conclusions that the Project's impacts to public services will be less than significant are not supported by substantial evidence or analysis.

The Project May Require New or Relocated Fire Protection Facilities

The DEIR does not provide support for the contention that new or altered fire facilities will not be required for the provision of fire and emergency medical services. The DEIR concludes that "Project Impacts with regard to LAFD facilities and equipment would be less than significant." (DEIR, IV.J.1-25.) However, this is in direct contradiction to the LAFD's comment letter on the NOP. The LAFD identified a multitude of problems with the Project's potential impacts on LAFD facilities and services.

First, the LAFD states, "the first-due Engine Company should be within 1.0 mile(s), the first-due Truck Company within 1.5 mile(s)." (DEIR Appendix K (no page number provided).) The LAFD then notes that the closest fire station to the Project is located 1.2 miles away. Based on this observation, the LAFD states unequivocally: "Based on these criteria (response distance from existing fire stations), fire protection would be considered **Inadequate**." (DEIR Appendix K (no page number provided) (emphasis in original).) LAFD then explicitly states that, "At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which would serve the proposed project." (*Id.*) Thus, the LAFD concluded that it does not presently have, nor in the planned future in a world without the Project plan to have, adequate fire stations to serve the Project. Therefore, the DEIR's conclusion that Project impacts would be less than significant is unsupported and incorrect.

Notwithstanding the Fire Department's clear response, the DEIR rejects the Fire Department's analysis and provides a conclusion contrary to the Fire Department. The DEIR states that, "Although the Project would exceed the LAFD-required response distance for a fire station with an engine company, LAFD concludes in its correspondence that inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the

impacts to an acceptable level.” (DEIR, p. IV.J.1-23.) However, the DEIR is citing a completely separate portion of the LAFD comment letter. The LAFD comment letter is broken up into four substantive sections: Fire Flow, Response Distance, Fire Stations, and Firefighting Personnel & Apparatus Access. Its conclusion following the section on Fire Stations is what was described above: “fire protection would be considered **Inadequate**.” In the next section, “Firefighting Personnel & Apparatus Access,” LAFD lists 27 recommendations that the Project incorporate into its design and procedures to ensure adequate access for Fire Department personnel and apparatus. At the end of the section addressing “Firefighting Personnel & Apparatus Access,” LAFD concludes, “The inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level.” (DEIR Appendix K (no page number provided).) LAFD is clearly only referring to impacts related to Firefighting Personnel & Apparatus Access. This conclusion is not related to and does not change the LAFD’s earlier conclusion that fire protection based on the location of the nearest fire station would be **Inadequate**.

LAFD explicitly ends the entire letter, summarizing the potential impacts as follows: “The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

- Increased staffing for existing facilities.
- Additional fire protection facilities.
- Relocation of present fire protection facilities.”

Please explain why the DEIR contradicts the clear conclusion of the Fire Department that “fire protection would be considered inadequate” and the further statements in the Fire Department letter regarding deficiencies in fire facilities. This is the precise type of impact that CEQA seeks to disclose, analyze, and mitigate. Please explain why the DEIR not only completely ignores this conclusion by the Fire Department but provides a contrary unsupported conclusion.

This is a new significant impact and therefore the DEIR must be revised to assess the potential environmental impacts of the additional fire protection facilities or relocation of fire protection facilities that LAFD identified as potential impacts of the Project.

After LAFD Concludes Fire Facilities are Inadequate, The DEIR Defers Public Service Impacts Analysis

The DEIR states that “the City and LAFD would continue to monitor the overall demand for existing and projected fire facilities and coordinate the development of new fire facilities to

be phased with growth.” (DEIR, p. IV.J.1-25.) This statement is not an appropriate analytical framework when determining whether the Project will have an impact on the environment for the purposes of CEQA and what should be the required mitigation particularly given the LAFD’s statements regarding existing inadequacy of facilities. CEQA requires the lead agency to determine impacts of a project and then, if there is an impact, provide mitigation to lessen the impact. The analyses and the needed mitigation cannot be deferred. It is clear from the LAFD letter there is an impact. The DEIR must properly disclose the impact and provide for appropriate mitigation to reduce the impact.

CEQA requires an analysis of what impact the Project will have on fire and police resources and not rely on a post-approval assessment of what is required. It is feasible to analyze the potential need for new fire facilities due to the Project. Why has this analysis not been provided? The DEIR should have analyzed the relevant data, determined whether the data indicates that additional resources would be needed, and then determine significance. What is the data and why was it not fully provided in the DEIR? Instead, the DEIR ignores the conclusion of the LAFD and improperly defers the analysis to the future. The DEIR must fix this error, recognize the significant impact, and determine what is the appropriate mitigation. Once done, the DEIR must be recirculated for the public’s comment.

Response to Comment No. 26-147

The commenter incorrectly asserts that the analysis of fire protection services and the need for new facilities is inadequate. The methodology for analyzing a project’s impacts on fire services is discussed on pages IV.J.1-20 to IV.J.1-21 of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR. As discussed therein, the need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable as a direct or indirect effect of the project. There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area.

The Project’s impacts on fire protection services during construction were analyzed on pages IV.J.1-21 to IV.J.1-23 of the Draft EIR. As discussed therein, Project construction activities would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental

impacts. Therefore, impacts on fire protection services during Project construction would be less than significant.

As stated on page 2 of the LAFD letter (Appendix K of the Draft EIR), “[t]he adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department’s judgment for needs in the area.” Regarding required fire flow, as discussed in Response to Comment No. 16-10, the local infrastructure serving the Project Site with regard to fire flow would be adequate. As discussed on page IV.J.1-23 of the Draft EIR, the Project Site would be located outside of the 1.0-mile response distance from a fire station with an engine company but would be located within the 1.5-mile response distance from a fire station with a truck company. In these situations, per LAMC Sections 57.507.3.3 and 57.512.2, the Project would be required to include automatic fire sprinkler systems in all structures, in addition to the fire protection features listed in LAFD’s inter-departmental correspondence regarding the Project (see Appendix K of the Draft EIR). The automatic fire sprinkler requirement addresses the distance issue. In addition, LAFD concludes in its correspondence that “inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level.” Refer also to Response to Comment No. 9-35 as well as the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR which confirms impacts related to fire protection would be less than significant.

In addition, the analysis in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR appropriately incorporates statements from LAFD’s letter regarding the continued monitoring of the need for services and facilities by the LAFD as such monitoring is required by all City departments to ensure services continue to be adequately provided for. Refer to Response to Comment No. 35-132 for a discussion of how the Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage, and management of hazardous materials, alarm and communications systems, etc., including as set forth in the written correspondence from LAFD included in Appendix K of the Draft EIR.

As such, there is no deferred analysis, and no significant impacts requiring mitigation would occur as a result of implementation of the Project. Rather, the analysis of fire protection services has been prepared in accordance with CEQA and based on the input provided by LAFD. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 for additional discussion regarding recirculation.

Comment No. 26-148**The DEIR Relies on Piecemealing to Show Less Than Significant Impacts**

A basic tenet of CEQA is that a project cannot be piecemealed into a bunch of smaller projects to avoid analyzing impacts. Yet, the DEIR does just this when it states “if new [fire] facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA.” (DEIR, p. IV.J.1-25.) Not only is this classic deferred analysis in violation of CEQA, but it is also piecemealing the environmental analysis particularly in light of the LAFD statement that existing facilities are “Inadequate.”

Please explain why it is permissible to defer required analysis of a critical impact such as fire services, after the LAFD has said exiting [sic] facilities are inadequate, and why piecemealing is appreciate [sic] for the critical issue. This is error and the DEIR should be revised to analyze the likely required additional fire stations within the Project EIR and the impacts associated with development of those facilities.

Will the additional fire facilities be a requirement of the Project? If not, how will the fire facilities be developed? What will be the impact of the delay in providing the additional fire facilities?

Response to Comment No. 26-148

Refer to Response to Comment No. 26-147 regarding the less-than-significant impacts associated with fire protection services as analyzed in detail in Section IV.J.1, Public Services—Fire Protection, of the Draft EIR and confirmed again in the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR.

As discussed in Response to Comment No. 26-147, there is no deferred analysis of impacts as asserted by the comment. Nonetheless, at a future time, should the LAFD determine that a new or expanded fire station is required within the City, the Draft EIR analysis is correct in that if new fire facilities were needed in the future, associated construction would be required to undergo separate environmental review in accordance with CEQA. Contrary to the assertion in this comment, this is not piecemealing because any future fire facilities are not included in the Project, and as discussed previously, are not being triggered by the Project. The Draft EIR analyzed the whole of the action, including all discretionary actions necessary to carry out the Project, in accordance with CEQA.

Comment No. 26-149**The DEIR Fails to Analyze Response Times**

The DEIR states, “LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical service response and 5 minutes 20 seconds for fire suppression response.” (DEIR, IV.J.1-16.) However, the DEIR is silent as to the impact the Project will have on response times. Despite discussing response times in the Existing Conditions portion of the section, the DEIR includes no analysis of response times in the Project Impact portion of the section. This is despite the DEIR’s own recognition that “response times can be considered to assess the adequacy of fire protection and emergency medical services.” (DEIR, p. IV.J.1-17.)

As is further described in Section K, Traffic and Transportation, *infra*, the Project is going to cause significant traffic impacts in the Project vicinity. There is no discussion of whether these significant traffic impacts will cause emergency response times longer than 5 minutes, an outcome that seems very likely. What would be the impact on fire response times from the Project? What would be the impacts from the maximum amount of construction truck traffic? From the maximum amount of operational employee, visitor (including audience) and production truck traffic? The DEIR must be revised and recirculated to include this necessary missing information and with the proper analysis conducted to inform the public and decision makers of the Project’s impacts on emergency response times.

Response to Comment No. 26-149

Refer to Response to Comment Nos. 9-35 with regard to LAFD emergency response times and Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, regarding emergency access and emergency response times during both construction and operation of the Project. Impacts to emergency services are not determined based on the LOS grades of intersections, and LOS is no longer used to determine significant transportation impacts under CEQA per SB 743. Refer to Topical Response No. 8, Vehicle Miles Traveled; Section B, Level of Service, and Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion; and Response to Comment No. 9-35. As discussed therein and in Section IV.K, Transportation, Section IV.J.1, Public Services—Fire Protection, and Section VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of the Draft EIR, the Project would provide adequate emergency access. Therefore, the Draft EIR correctly concluded that the Project’s impact on emergency access and fire-related services would be less than significant.

This comment does not provide substantial evidence that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-150

The DEIR Fails to Analyze the Project’s True Impacts

The DEIR discusses potential impacts to fire and police based on the square footage of the Project. Square footage alone does not cause public service needs; the people and the uses on top of that square footage also causes public service needs. The DEIR states that “the Project would result in a total net increase of approximately 1,130,320 square feet of floor area upon full buildout. As such, the Project would increase the demand for LAFD fire protection and emergency medical services” (DEIR, IV.J.1-24.) In addition to the issues regarding the DEIR’s failure to properly include all square footage discussed throughout this letter, this avoids the required analysis.

For example, how many people will be on the site on an average day? What will those people be doing? The DEIR states that the proposed uses would be “expected to generate a range of fire service calls similar to other studio uses” (*id.*) but does not disclose what those uses are or the number of service calls that such uses generate. Does that account for all the uses proposed for the Project? Audience and entertainment shows, special events, and theaters? In the Police Protection section of the DEIR, it is stated that there would be a net increase of 5,702 employees on-site per day. However, that does not disclose anything about the number of visitors. Does that include the potential for over 5,000 audience members attending shows at the Project Site? Does that account for possible auditorium use? What are the differing impacts if a significant percentage of these visitors park in the community? The DEIR should be revised with this updated information.

Response to Comment No. 26-150

As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 5-7, the Draft EIR has properly accounted for all square footage proposed by the Project.

In addition, refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five uses that would be permitted on-site (i.e., sound stage, production support, production office, general office, and retail) and the continued special events that would occur through the existing Temporary Special Event permit process through the Department of Building and Safety. All of the permitted uses already occur on-site with the exception of retail and childcare, which have been accounted for in the impact analyses within the Draft EIR. The

statement that the proposed uses would be “expected to generate a range of fire service calls similar to other studio uses” accounts for all permitted uses. The Project does not include any auditorium uses (apart from sound stages with audience seating) or theaters open to the public.

With regard to audience visitors to the Project Site, refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, which shows that the number of visitors to the Project Site on an average weekday would be approximately 427 visitors (in approximately 194 vehicles), well below the 5,000 audience visitors suggested by the commenter.

Also refer to Topical Response No. 13, Parking, regarding how the Project would provide convenient and sufficient on-site parking to its employees and visitors to meet its full demand and prevent spillover parking in the nearby community (please note that parking does not relate to the analysis of fire and police protection services under CEQA). Refer to Table II-15 therein, which estimates the maximum number of vehicles that may be parked on-site at a given time.

Furthermore, as discussed above and in Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, visitors would represent a small fraction of the Project’s on-site population. In addition, as discussed in detail in Sections IV.J.1, Public Services—Fire Protection, and IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project includes numerous features that would reduce the need for fire and police protection services. As discussed in Response to Comment Nos. 16-5, 16-10, 26-147, and 35-133, the City has concluded that impacts on fire and police protection services would be less than significant.

Comment No. 26-151

In addition, the Police Protection section of the DEIR includes PDFs that are disguised mitigation and the DEIR all but comes out and says that. The DEIR states, “[t]he proposed Project design features... would help offset the Project-related increase in demand for police services.” (DEIR, p. IV.J.2-16.) Offsetting impacts are mitigation measures, not PDFs. A properly formulated PDF is part of the project that avoids an impact, not part of a project that “offsets” or lessens an impact. The DEIR seems to imply that the PDFs will be used to bring the Project’s impacts below a significance level. The DEIR should be revised to change the PDFs to mitigation measures to reflect this reality.

The DEIR also fails to analyze potential impacts of the PDFs themselves. For example, POL-PDF-2 requires “fencing, walls, landscaping, and other elements to create a physical barrier at the Project Site perimeter.” (DEIR, IV.J.2-12.) The DEIR must be revised to consider what environmental impacts these features will have. For example, will such

“fencing, walls, landscaping, and other elements to create a physical barrier at the Project Site perimeter” impact the visibility of the HCM?

In addition, POL-PDF-6 is deferred mitigation. The Project team should be consulting with LAPD now and not “prior to the issuance of a building permit” to incorporate feasible crime prevention features into the Project. Will the security measures be part of the Specific Plan?

Response to Comment No. 26-151

The PDFs included in Section IV.J.2, Public Services—Police Protection, of the Draft EIR are not disguised mitigation measures as asserted by the commenter. Rather, these PDFs are included as an integral part of the design of the Project given the security needs of a large-scale studio and are part of the Project that is analyzed by the EIR. As discussed in Response to Comment No. 26-43, by definition, mitigation measures are not part of the original project design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are above-and-beyond existing laws, regulations, and requirements that would reduce environmental impacts.

As described in detail on pages IV.J.2-12 and IV.J.2-13 of the Draft EIR, these PDFs include security fencing, secured points of entry, 24-hour security cameras, private on-site security staff, staff security training protocols, security lighting, design for visibility, and further coordination with LAPD at the building permit and certificate of occupancy stage. These PDFs would not result in any environmental impacts. Rather, they would enhance safety and security. With regard to Project Design Feature POL-PDF-2, which requires fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter, the Project Site already includes similar elements along the perimeter.

Furthermore, regarding impacts to visibility of the HCM, as discussed in Section IV.B, Cultural Resources, of the Draft EIR and in Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Project would open up the currently obstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised in the past. As such, contrary to this comment, the Project, including Project Design Feature POL-PDF-2, would not impact the visibility of the HCM.

Furthermore, Project Design Feature POL-PDF-6 is not deferred mitigation. LAPD was consulted with regard to the Project (see the LAPD Response Letter attached as Appendix L of the Draft EIR), and LAPD concluded that the Project would not require any special police protection requirements and would not result in the need for new or altered

police facilities. As discussed in LAPD's inter-departmental correspondence regarding the Project and in Project Design Feature POL-PDF-6, the Applicant will also consult with LAPD's Crime Prevention Unit prior to the issuance of a building permit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project as it at this time that detailed plans are reviewed by LAPD and other City departments. These would be on-site features that would improve safety and security and would not result in impacts on the environment.

All of the PDFs related to security and safety that are included on pages IV.J.2-12 and IV.J.2-13 of the Draft EIR will be included as part of the Project's Mitigation Monitoring Program, which is included as Section IV, Mitigation Monitoring Program, of this Final EIR, which will also be appended to the Specific Plan.

Comment No. 26-152

The DEIR Improperly Relies on the City's Obligation in the California Constitution

Rather than disclosing, analyzing, and mitigating the Project's impacts on public services, the DEIR simply states that the City will have the obligation to fix whatever problems the Project creates and therefore the DEIR doesn't need to analyze them. In light of the Fire Department's statement regarding the inadequacy of facilities and the policies of the Wilshire Community Plan, this is in clear opposition to CEQA's requirement that a Project disclose, analyze, and mitigate its impacts. If the Project causes impacts that jeopardize public safety as described above, the DEIR should be revised to remove the reliance on the City's constitutional obligation and add in analysis of the Project's obligation to mitigate its impacts.

Response to Comment No. 26-152

Refer to Response to Comment Nos. 16-5 and 26-147 regarding the adequacy of LAFD fire protection services and infrastructure to serve the Project. Also refer to the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR which reaffirms that the Project would not result in significant impacts associated with fire protection and the need for new fire protection facilities. Note that as demonstrated in the detailed analyses provided in Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the analyses do not rely on the City's constitutional obligation to provide fire and police protection services. These obligations are presented in the regulatory framework of these sections and are not the sole basis for the impact conclusions. Rather, the impact conclusions are based on specific criteria and information provided by LAFD and LAPD.

Comment No. 26-153**The Cumulative Impact Analysis is Inadequate**

As described throughout this letter, the DEIR's cumulative impact analysis, which is limited to only the *potential* buildout of 2026 but not the allowed or more likely buildout over 20 years, is inadequate. Fire and Police services are heavily dependent on the types of uses and the number of people in a certain area. By limiting the analysis of cumulative impacts to only the next four years, the DEIR improperly limits the scope of potential impacts from other foreseeable development in the area through 2043.

Response to Comment No. 26-153

The cumulative impact analyses in the Draft EIR account for the development of all known related projects in the vicinity of the Project based on information provided by LADOT and the Department of City Planning. This list of related projects is not limited to projects with a buildout year of 2026. Thus, the Draft EIR fully evaluates cumulative impacts based on a list of reasonably foreseeable projects and also includes a specific discussion of a long-term buildout scenario for each of the impact analyses. As discussed on page IV.J.1-28 of Section IV.J.1, Public Services—Fire Protection, and on pages IV.J.2-17 and IV.J.2-18 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project's fire and police protection requirements would not change with a later buildout date, as such requirements are based on full occupancy and operation of the Project regardless of when they occur.

Cumulative impacts on fire protection services are analyzed on pages IV.J.1-28 to IV.J.1-30 of the Draft EIR, and the analysis conservatively assumes that all of the related projects would be built out at the time the Project is built out. As stated therein, as with the Project, the related projects and other future development projects in the surrounding area would be required to comply with applicable regulatory requirements related to fire protection. In addition, each related project and other future development projects would be reviewed by LAFD (or the respective fire department) to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, the Project, related projects, and other future growth would be subject to the standard construction permitting process, which includes review by LAFD (or the respective fire department) for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP (or the respective water supplier) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. In addition, the related projects and other future development projects in the City would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Cumulative increases in demand for fire protection and emergency medical services due to

the related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD will continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Consistent with the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, will be identified and allocated according to the priorities at the time. At this time, LAFD has not identified the need for any new stations or station improvements in the Project area either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and would not be expected to result in significant impacts. Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, as stated on page IV.J.1-30 of the Draft EIR, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on fire protection services would be less than significant.

In addition, refer to the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR, which confirms that the Project's contribution to cumulative impacts would be less than significant.

With regard to cumulative impacts related to police protection, as discussed on pages IV.J.2-18 through IV.J.2-22 of Section IV.J.2, Public Services—Police Protection, of

the Draft EIR, the cumulative analysis assumes that all of the related projects would be built out at the time the Project is built out. Based on a household size factor of 3.14 persons for affordable multi-family units and 2.25 persons for other multi-family housing, the residential component of related projects that fall within the service area of the Wilshire Community Police Station would generate approximately 4,592 residents. The Project does not include residential uses and would not add to this residential population and thus would not affect the crime per capita rate. Furthermore, while the daytime population in the Wilshire Area is anticipated to increase as a result of the Project, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-7 to reduce its demand for police protection services. As stated by LAPD, “[t]he TVC 2050 Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities.”⁶⁶ As such, the Project’s incremental impact would not be cumulatively considerable, and cumulative impacts would be less than significant. Additionally, similar to the Project, each related project located in the City would be subject to the City’s routine permitting process, which includes a review by LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City’s regular budgeting efforts, LAPD’s resource needs would be identified and monies allocated according to the priorities at the time.⁶⁷ In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related projects located in the City, would generate revenues to the City’s General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate.

Thus, as concluded in the Draft EIR, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project’s contribution would not be cumulatively considerable, and cumulative impacts on police protection services would be less than

⁶⁶ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of the Draft EIR.

⁶⁷ City of Los Angeles, Proposed Budget for the Fiscal Year 2021–22.

significant. Based on the above and the detailed analyses included in Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the cumulative analyses regarding public services have been completed in full compliance with CEQA.

Comment No. 26-154

K. Traffic and Transportation

Under Senate Bill 743, agencies must analyze a project's traffic impacts using vehicle miles travelled or "VMT." The DEIR's approach to VMT analysis is fatally flawed and must be redone.

The traffic analysis uses the City of Los Angeles VMT Calculator Version 1.3 (July 2020). (DEIR, p. IV.K-6.) As discussed in the Linscott Law & Greenspan Comments on Transportation Section and Transportation Assessment in Draft Environmental Impact Report for TVC 2050 Project (LLG Report), the official User Guide for the City's VMT calculator states that it is "specifically designed and intended to be used to develop project specific daily household VMT per capita and daily work VMT per employee metrics for residential and office land use development projects in the City of Los Angeles." (Los Angeles Department of Transportation, City of Los Angeles VMT Calculator User Guide Version 1.3 (May 2022) at I ("User Guide"); available at https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_user_guide-2020.05.18.pdf.)

The User Guide goes on to expressly state the VMT calculator "is not designed to do the following:... [e]valuate VMT impacts of... entertainment projects [or] [e]valuate VMT impacts of land use plans (e.g., general plans, community plans, and specific plans)." (*Id* at 2, 3 (emphasis in original).)

The Project includes the adoption of a Specific Plan. Indeed, the Specific Plan essentially is the Project. (E.g., DEIR, p. II-1 ("The TVC 2050 Project (Project) would establish the TVC 2050 Specific Plan (Specific Plan)...").) The Project is requesting a land use change to "Regional Center" and adoption of a Specific Plan.

The Project objective describes the project as a "major studio and entertainment center" and an "iconic entertainment and media center." The DEIR also repeatedly describes the Project as an "entertainment" project. The allowed entertainment uses described in the DEIR are broad. (*Id.* at II-15, 16.) The Project will be a major entertainment venue used for unlimited audience and entertainment shows, special events, e-sport events, theaters and other entertainment uses allowed in the C2 zone, attracting thousands of visitors.

Given this, why was the calculator used for this specific plan project that characterizes itself in its project objectives as an “iconic entertainment and media center”? What evidence is there that the calculator is an accurate predictor of VMT for this Project? The User Guide expressly rejects use of the VMT calculator for this Project.

It makes sense because the calculator is based on a static model and the inclusion of a specific plan with thousands of employees and visitors changes the calculator’s equilibrium. As such, the calculator is not an accurate predictor of VMT for specific plan projects, such as this Project, because once the equilibrium is changed the calculator doesn’t respond to this change. Why was the VMT calculator used for the Project when the express instructions of the City’s Official User Guide is that the calculator not be used for a specific plan? How can the VMT calculator be used when the Project itself changes the calculator’s and underlying model’s equilibrium? Since the calculator cannot be used for specific plans please provide a new VMT analysis that accurately predicts the Project’s VMT.

The VMT traffic analysis must “be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences” and it must reflect “completeness, and a good faith effort at full disclosure.” (*Id.*; 14 Cal. Code Regs. § 15151.) There is no disclosure in the DEIR to justify the use of the VMT Calculator. Using the City’s VMT calculator is contrary to the express instructions in the City’s User Guide and there is no analytic framework provided in the DEIR to support its use.

The DEIR states that it “uses a conservative (i.e., worst-case from a trip generation perspective) mix” of uses to estimate traffic from the Project. (DEIR, p. IV.K-35.) This claim is not supported by any data or modeling that the mix of uses are in fact the worst-case. The analysis is opaque and difficult for a layperson or a decision-maker to sift through, and it is clear that the DEIR minimizes and understates the Project’s true traffic impacts. How is the mix of uses analyzed the “worst-case”? What evidence is there that the use mixes analyzed are a “worst-case”?

Response to Comment No. 26-154

The VMT analysis was completed in full compliance with CEQA and LADOT requirements. Refer to Topical Response No. 8, Vehicle Miles Traveled, for a detailed discussion of the appropriateness of using the City’s VMT Calculator for the Project. Topical Response No. 8 includes an explanation of why a development project implemented under a specific plan can and should be analyzed using the VMT Calculator. It also explains why the City’s definition of an “entertainment project” is not applicable to the Project. Finally, it describes why the Project is not large enough to change demographics in a meaningful way such that the data underlying the VMT Calculator would become invalid. Please note that this comment includes an inaccurate quotation of the Draft EIR;

page II-11 of the Draft EIR states “major studio and entertainment institution” and not “major studio and entertainment center” as incorrectly stated in the comment.

Also, refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five permitted land uses under the Specific Plan and the regulation of special events (e.g., premieres, charitable events, community events, commercial events, and non-commercial events, etc.). All of the permitted uses have been accounted for in the transportation analysis.

The comment also questions how the Project’s mix of land uses can be considered to be the worst-case from a trip generation perspective as the Specific Plan would permit a narrow range of flexibility in what studio land uses may be developed through the Land Use Exchange Program described on pages II-16 to II-17 of the Draft EIR. The proposed development program includes 350,000 square feet of sound stages, 104,000 square feet of production support, 700,000 square feet of production office, 700,000 square feet of general office, and 20,000 square feet of retail, for a total of 1,874,000 square feet. Under the Land Use Exchange Program, the amount of sound stage may be increased up to a maximum of 450,000 square feet, and production support may be increased up to a maximum of 450,000 square feet, in exchange for an equivalent decrease in the floor area of any of the other permitted land uses (individually or in combination). Importantly, the two office uses and the retail space generate the most trips, and the Project assumed the maximum allowable buildout of each of those uses under the Land Use Exchange Program. Further, the specific mix of retail land uses was chosen to maximize trip generation.⁶⁸ Sound stages and production support generate fewer trips per square foot, and, therefore, the Project assumed the least amount of those uses as is possible within the total permitted floor area under the Land Use Exchange Program. Hence, the assumed Project land use program resulted in the maximum (i.e., worst-case) trip generation. Also, since the CEQA analysis is based on VMT rather than trips, two supplemental land use programs under the Land Use Exchange Program were analyzed that generate slightly higher VMT or VMT per employee than the Project. The results of these “maximum transportation impact” scenarios were described on page IV.K-77 of Section IV.K, Transportation, of the Draft EIR. Neither would exceed the City’s significance threshold or result in significant VMT impacts. Refer to Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, and Appendix FEIR-3,

⁶⁸ The retail land use assumption was chosen to present a realistic potential development scenario that would maximize trip generation. It consisted of 15,000 square feet of supermarket, a 3,500 square foot high-turnover restaurant, and a 1,500 square foot coffee shop. These uses generate substantially more trips during both the morning and afternoon peak hours than standard retail uses and other specialty uses that could be developed within the 20,000 square feet of retail space. The retail trip generation estimates are provided in Appendix E to the Transportation Assessment, provided in Appendix M.1 to the Draft EIR.

Maximum Impact Scenarios, of this Final EIR for additional details about the maximum transportation impact scenarios.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding the number of audience shows and trips under existing conditions and the Project.

Refer to Section C, Special Events, of Topical Response No. 10, Trip Generation, regarding special events.

Comment No. 26-155

The traffic analysis appears to omit trips and VMT from some of the specified uses for this Project. Are the assumptions regarding trip and VMT consistent with the Specific Plan? How are the trips and VMT from the following uses accounted for in the analysis: special events; audience shows; entertainment shows; e-sports; and any number of other uses permitted in the C2 zone? What assumptions were made regarding these permitted uses? These uses alone could generate thousands of VMT. They do not appear to be accounted for in the VMT calculator or transportation analysis. If these uses are permitted (as the DEIR indicates they are) and are not accounted for in the traffic analysis, then please explain how the DEIR could conclude this is a “worst-case” from a trip generation perspective. Is it even an accurate or reasonable assessment, if the DEIR states these uses are permitted and they are not included in the trip generation? To meet CEQA’s standard of “completeness, and a good faith effort at full disclosure,” it is essential that the DEIR first disclose the VMT for all of the proposed uses the Project allows and clearly delineate how the VMT for each use was accounted.

As discussed above, how and to what extent the extensive list of permitted uses are allowed in the Specific Plan is unclear. As the DEIR is drafted, the public and the decision-maker have no idea how VMT and traffic will change if the Project is constructed and used for the different allowable uses. For example, e-sports are a burgeoning entertainment area and an allowed use. But how are the trips for e-sports events (including spectators) accounted for in the analyses? How many e-sport facilities are allowed? Are they part of the sound stage permitted square footage or other land use? What about the other laundry list of C2 uses?

Similarly, how many “audience and entertainment uses” were assumed, and how were those traffic impacts, including VMT, calculated? Are the audience and entertainment uses under the sound stages permitted square footage? As detailed in the LLG Report, currently, each sound stage at Television City is rated for audience shows with many allowing for 300+ audience members. If all permitted sound stages in the future are used for audience shows this can be over 5,000 audience members per day (assuming only one

show a day). How did the DEIR consider audience trips and the impact on VMT? The permitted uses also allow for arenas, stadiums, and auditoriums each with an occupancy of up to 3,000 people. Were these uses accounted for in the VMT analysis? What size theater was included in the VMT analysis? What size special event? Please describe how each permitted use was accounted for in the transportation analyses. Without the Specific Plan it is not possible to assess.

Again, the traffic generated for each of these uses could substantially differ. Using a generic trip-generation factor without accounting for the extensive list of permitted uses or providing more information regarding the regulation of these uses in the Specific Plan is inadequate. Adequate disclosure and analysis requires that the public have enough information in the DEIR to understand the existing traffic and VMT, how the Project will change the traffic and VMT, whether additional generation sources cause significant impacts, and what, if any, mitigation is required. The DEIR falls far short of that standard. For example, in a week with ten audience-participation shows and 2 feature film filming, an e-sports tournament, a new museum exhibit, a theater event, and warehousing what would the trip generation be and what would the VMT be? This information cannot be ascertained from the DEIR. And every one of those uses is a permitted use.

To meet CEQA's information mandate, the DEIR must include analysis of all uses allowed by the Specific Plan (which is not available) and the trips generated and the VMT generated by each use. Though the public does not have the Specific Plan, by what is presented in the DEIR it apparently would be up to the Project proponent whether to build a project that emphasizes, for example, e-sports over motion picture production, or warehousing and office rather than studio uses. There is no information in the DEIR that indicates otherwise. There is nothing stated requiring the Project applicant to build any particular element of studio or office or to link the other litany of uses to on-site studio uses. According to the DEIR, the applicant could build all office and no stages. How did the DEIR assess the range of non-studio uses for the Project? Please provide a transportation analyses that reflects the range of possible uses and configurations of the site.

The public deserves to know how those decisions affect traffic and VMT. Specifically, please provide the trip and VMT generation factors assumed for each of the following uses allowed in the DEIR:

motion picture, television, and broadcast studios and related incidental uses, including, but not limited to: production activities; indoor and outdoor stages; sets and façades; digital, film, video, audio, video game, eSports, and media production; recording and broadcasting; sound labs; film editing; film video and audio processing; sets and props production; computer design; computer graphics; animation; and ancillary facilities related to those activities. The following types of related uses and facilities would also be permitted, as

detailed in the Specific Plan: basecamps, communication facilities, conference facilities, modular offices and trailers, studio support facilities, parking, various ancillary commercial and retail uses to serve the on-site employees and visitors, catering facilities, special events, audience and entertainment shows, museum exhibits and theaters, childcare and educational facilities, fitness facilities, emergency medical facilities to serve the on-site employees and visitors, fueling stations and vehicle repair related to on-site uses and activities, infrastructure, maintenance and storage facilities, mills/manufacturing, sleeping quarters for certain on-site personnel, recreational facilities, restaurants and special event areas including the sale of alcoholic beverages, security facilities, signs, storage and warehouses, helipad, and all other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan. (DEIR, p. II-15, 16.)

These uses are so diverse, it is simply not the case that a single trip or VMT-generation factor covers all of them, and the DEIR should disaggregate the trip and VMT generation by permitted use. Please provide a matrix showing the trip and VMT generation rates for each of the uses that the DEIR states is permitted to occur at the Project Site.

Response to Comment No. 26-155

Refer to Topical Response No. 8, Vehicle Miles Traveled, and Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for information about how sound stage audience shows (which could include entertainment shows or e-sports productions with an audience) were accounted for in the trip generation estimates and VMT calculations. As described therein, studio audience activity is anticipated to approximately double from current levels with the Project, resulting in approximately 388 total average daily trips.

Regarding special events, the Specific Plan would not regulate special events. As discussed in Section C, Special Events, of Topical Response No. 10, Trip Generation, approximately three such events occur at the Project Site today with special event permits from the City. They are evaluated on a case-by-case basis by various City departments in the granting of event permits, and this process would not be affected in any way by the Specific Plan.

Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the refined list of permitted uses within the Project Site that corresponds with the proposed set of uses outlined in the proposed Specific Plan. As shown therein, five studio land uses (i.e., sound stage, production support, production office, general office, and retail) are permitted in addition to a refined list of permitted sitewide uses that are ancillary to those five uses. The sitewide uses are standard features of a studio campus and are inherent in the trip generation rates used to estimate Project trip generation (which were also used in the

calculation of VMT per employee). More specifically, these additional sitewide uses are ancillary to the core studio uses, and do not generate external trips or VMT. The list of C2 uses referenced in the comment is not proposed and this reference has been removed from Section II, Project Description, of the Draft EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As discussed in Topical Response No. 3, Permitted On-Site Uses, in response to comments on the Draft EIR, the list of permitted uses in the Draft EIR was refined to correspond with the proposed uses outlined in the Preliminary Draft Specific Plan. Specifically, the Draft EIR was clarified to substantially narrow the permitted uses consistent with the studio-related objective of the Project. E-sports and theater facilities that are used for production activities would be permitted under the sound stage definition and would not be permitted in any other permitted use such as production office or production support. In addition, arenas, stadiums, and auditoriums with up to 3,000 people, as identified in the comment, would not be permitted. Warehouses would not be permitted, but storage would be permitted for production support uses and basecamp areas.

As discussed throughout all sections in the Draft EIR, the Project is a studio project that would include sound stage, production support, production office, general office and retail uses. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. Additionally, the Specific Plan would incorporate all of the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review.

Overall, the trip generation estimates and VMT analysis provided in Section IV.K, Transportation, of the Draft EIR and the Transportation Assessment (Appendix M.1 of the Draft EIR) fully address all of the uses set forth in the proposed Specific Plan.

Comment No. 26-156

As the Project Site is an operating studio, why doesn't the DEIR include information for the existing trip generation, VMT, and transit use at the Project Site under baseline conditions? The Project Site is a working studio with offices and production facilities. This information would be uniquely helpful to assess the actual trip generation and VMT generation related to the Project Site. Why was 2009 data from another studio used rather than data from the

existing Project Site? Television City is different from the other studios in that it is all audience participation stages. In light of the differences, what was the basis for determining that the trip generation rates from the other studios were applicable to Television City absent corroborating data? Please provide existing baseline data on vehicle trips, distance and direction of travel, and transit use for the Project Site.

The DEIR VMT analysis assumes that 15% of the workers at the Project Site use transit. (DEIR, p. IV.K-35.) Again as there is an existing studio at the Project Site with workers who commute, there is no reason to use a generic 15% factor to account for transit use. The DEIR should use actual data based on the existing workers to determine what percentage of trips and VMT are displaced by transit use. What is the baseline transit use by the existing users at the Project Site today?

As it stands, there is no substantial evidence that 15% of trips and VMT are displaced by transit trips. Data from the California Air Resources Board shows that in Southern California, before the pandemic, only 3.8 percent of drivers in the area including Los Angeles took transit. (Data available at <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/dashboard-tracking-progress-sustainable>.) Almost all people drive alone to their jobs. (See CARB, Appendix A Regional and Statewide Transportation, Housing, and Land Use Performance Metrics Under SB 150 (June 2022) at 32, available at https://ww2.arb.ca.gov/sites/default/files/2022-07/2022_SB_150_Appendix_A_Draft_ADA.pdf.) And again, even before the COVID pandemic, the trend for transit use was down-with fewer people taking transit and more people driving alone in their cars. (*Id.*) Since COVID, transit ridership has plummeted further. For example, the California Air Resources Board reports that “[a]lthough the transit ridership decline was occurring before the COVID-19 pandemic, a sharp decline in all regions due to the pandemic compounds the challenge to attain ridership at the levels identified in the [Sustainable Communities Strategy].” (California Air Resources Board, Draft 2020 Progress Report (June 2022) at 6.) Please provide support for assuming that Project employees will use transit. Does the transportation analysis assume that 15% of studio production trips and VMT are displaced by transit? Please provide support for the assumption of the level of transit usage by studio production workers. What assumption is made about the level of transit usage by production office workers? General office workers? Audience guests? Production and basecamp workers?

Further, the fact that the Project intends to provide an increased proportion of parking per square foot indicates that it does not expect to achieve the 15% transit use. As an example, the Project is providing office usage with 3 spaces per 1,000 square feet of floor area. This is higher than the LAMC requirement of 2 spaces per 1,000 square feet. Did the City consider limiting the amount of office parking to encourage transit? Why does the Project include more parking for office use for trips that will supposedly be reduced by employees using transit? If employees actually used transit, why would the Project need

more office parking than provided by the LAMC? Given the lack of support for the assumed transit use, the analyses that rely on the trip reductions from transit use (e.g., air quality, GHG, and noise) are inaccurate and need to be redone.

The modeled VMT per employee in the DEIR is 6.7 or 6.4 miles (or roughly a 3.2-mile commute distance), depending on the assumptions. (DEIR, pp. IV.K-76, 77.) However, the VMT Calculator User Guide states that the calculator should not be used for this Specific Plan project. Therefore, the VMT per employee generated for this Project is not reliable. The 3.2 miles is not supported by any other data in the DEIR. Actually, other published trip length data suggests that the Project VMT, if properly calculated, would be much greater. For example, the nearby City of West Hollywood traffic data documented an average commute distance of 15.8 miles, more than two times the value used in the DEIR. (See City of West Hollywood, Citywide Traffic & Mobility Study, available at <https://www.weho.org/city-government/city-departments/planning-and-development-services/long-range-planning/mobility-planning/citywide-traffic-mobility-study>.)

As explained in the LLG Report, the census data for the area indicates that more than half of the workers in the Project area commute greater than 10 miles each way, with more than 25% commuting more than 25 miles each way. And when plotted on a map, the DEIR's assumed commute length of 3.2 miles each way excludes areas of high residential concentration like West LA/Santa Monica, South LA and the Southbay, [sic] Downtown LA and the San Gabriel Valley, and the San Fernando Valley.

LLG also used Big Data analytics provided by StreetLightData (SLD) which showed that the daily average one-way trip length measured to and from the Project Site for all vehicles (employees, visitors, deliveries, etc.) is 17.1 miles. In addition, as discussed in the LLG Report, cell phone tracking data from the analytics company Placer compiled for 2018 and 2019 indicated that more than 65% of employees traveled greater than seven miles one-way to the Project Site.

Taken together, the inapplicable use of the VMT calculator and all of this data shows that the DEIR's assumed VMT per employee is grossly understated.

While modeled VMT analysis may be appropriate for a new use and when the model is intended for that use, there is no justification for using modeled VMT based on non-Project Site data here. The Project is an expansion of an existing studio use, and the Project is a Specific Plan. Why didn't the applicant obtain data regarding VMT from the existing uses, workers, and visitors and use the empirical site data to model the Project VMT? The output of the VMT calculator is further evidence that the use of the VMT calculator is inappropriate for this Project as stated in the User Guide. The output is inconsistent with other data and does not reflect where a significant percentage of studio workers live.

Page IV.K-15 of the DEIR describes the existing conditions and the transportation study area. However, because the DEIR understates the VMT and trips from the Project, the study area should be broader to account for the increased trip generation from the Project. In addition, there is no discussion of how the study area was selected. Please explain why, using the proper trip length and trip generation from permitted uses from this Project Site, a broader study area is not required. Why limit the study area to 31 intersections, when commuters can travel over 15 miles or more to and from the Project Site?

What is the distribution of commute lengths for workers at the existing studio? That data should be available from existing workers, and it is relevant baseline data for trip generation and VMT by the Project. How did the DEIR determine the appropriate distribution without the distribution of the existing employees and visitors? Was this information provided to the City? The information should be included in the DEIR.

Response to Comment No. 26-156

Refer to Topical Response No. 10, Trip Generation, for a discussion on the validity of the empirical data used to estimate trip generation for sound stage, production support, and production office uses, including a comparison of actual driveway counts of existing trips at the Project Site to estimates using those trip rates. Topical Response No. 10, Trip Generation, provides data on the trip generation of the existing studio operations, as requested in the comment. In the Transportation Assessment that was approved by LADOT (Appendix M.1 of the Draft EIR), the existing trip counts were not used as the sole criterion for the derivation of future trip generation rates because the proposed Project modifies the proportion of the land uses within the Project Site such that the trip rates from other studios with a land use mix closer to the proposed Project was determined to be a more appropriate and conservative basis for estimating future trips. The comparison of the existing driveway counts at the Project Site to the trip rates based on the NBC Universal Studios EIR showed that the use of the 2009 trip rate data is still accurate and reliable.

The ZIP Code information from the existing employees on the Project Site was used to inform the trip distribution estimates shown in Figures 19A and 19B on pages 69–72 of the Transportation Assessment. Detailed mode split data for the existing employees was not available.

It is inaccurate to describe the existing studio as comprised of “all audience participation stages.” At any given time, there are more stages operating without audiences than with audiences. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for more information on studio audiences.

Refer to Topical Response No. 11, Transportation Demand Management, for a discussion of the appropriateness of applying a 15-percent transit/walk-in adjustment to the

Project trip generation estimates. As discussed in Response to Comment No. 26-32, the proposed rate of three parking spaces per 1,000 square feet of office does not conflict with the 15-percent transit usage assumption. The Trip Generation Handbook, 3rd Edition (Institute of Transportation Engineers, September 2017) provides a summary of research of TDM programs at many different employers. As discussed in the Transportation Assessment, at places that had the most comprehensive programs, including both economic incentives (e.g., transit passes, etc.) and support services, the programs resulted in an average reduction of approximately 24 percent in commuter vehicles. The Project's TDM Program is robust. However, to be conservative, the Project's operational transportation analysis was conducted without consideration of any trip reductions as a result of the TDM Program.

There are several examples of major studio and entertainment campuses that have successfully implemented TDM programs for employees and visitors that have far exceeded the 15-percent automobile reductions estimated in the Draft EIR and even exceeded the estimated 20- to 30-percent reductions from the TDM Program.

- UCLA has one of the most successful TDM programs in Southern California, with participation from both students and faculty. As a result of the TDM program, a total of 17 percent of the faculty at UCLA travel to/from the campus via transit, and 25 percent of such faculty members have an annual salary over \$100,000. An annual comprehensive traffic count on the streets surrounding the UCLA campus shows that trips to/from the campus have decreased despite the growth in enrollment, faculty/staff, and programs. In 2006, the traffic count showed 120,000 vehicular trips in/out of the campus. That same cordon showed 102,000 in 2009. This reduction in vehicle trips is attributed to the TDM program used at the campus.⁶⁹
- Cedars-Sinai Hospital, which is located near the Project Site, has a TDM program that includes carpools, vanpools, transit passes, TAP cards and e-Trips, and these measures have helped the hospital reduce individual vehicle trips and parking demand. The hospital manages 32 vanpools that each carry between 5–14 people, removing an average of 200 automobiles from the street system every day.⁷⁰
- NBCUniversal has been working with Metro to institute the business transit access pass (BTAP pass) as part of the E-Pass system that offers employees discounted or free transit rides with seven different transit agencies. Tax-free

⁶⁹ Reference contact information: October 6, 2022 telephone interview with David Karwaski, email: dkarwaski@ts.ucla.edu.

⁷⁰ Reference contact information: October 6, 2022 telephone interview with Mercedes Del Cid, Cedars Sinai Hospital, email: Mercedes.DelCid@cshs.org.

financial transportation incentives and programs like a shuttle bus connection to the subway station have decreased the single-occupant vehicle trips from 59 percent of peak-hour employee arrivals to 14 percent for the employees in the initial pilot of this program.⁷¹

These examples demonstrate that a TDM program can reduce the number of automobile trips generated by a particular development. The programs described above reduced the amount of automobile trips in far greater numbers than the levels assumed in the Project's Transportation Assessment. Refer to Topical Response No. 8, Vehicle Miles Traveled, for a detailed discussion of the appropriateness of using the City's VMT Calculator for the Project. It includes discussions of the following:

- Why a development project implemented under a specific plan can and should be analyzed using the VMT Calculator;
- Why the VMT Calculator's estimate of 6.7 work VMT per employee does not mean that the average commute distance is half of that distance;
- That the alternative data sources cited in the comment (census data, Streetlight Data, Placer) are based on small, non-representative samples, cannot be isolated to employee trips, do not provide precise data, and are not approved for use in VMT analysis in the City;
- That there is no recommendation in City or State guidance on VMT analysis to use empirical trip lengths when a model-based solution that combines trip thresholds and Project analysis is available; and
- That it is important in conducting VMT analysis that both the thresholds of significance and the Project-level VMT estimates be developed using the same data source in order to ensure an apples-to-apples comparison.

The comment suggesting that the Study Area should have been larger and included analysis of more intersections is incorrect for many reasons. First, intersection analysis is not a CEQA requirement; therefore, the City can set boundaries at its discretion. Second, the Study Area was identified in accordance with guidelines provided in the TAG. Third, Project vehicles disperse and have a diminishing effect on any single location the further they are from the Project Site, and the Study Area was chosen to include locations with a specified concentration of Project vehicles (the TAG recommends including locations carrying at least 100 peak hour Project trips).

⁷¹ | October 6, 2022 telephone interview with Devon Demming, Los Angeles Metro.

As discussed in Topical Response No. 8, Vehicle Miles Traveled, the trip distribution and resulting commute lengths for existing on-site employees and for future Project employees are both taken from the LADOT VMT Calculator. Travel patterns in the VMT Calculator are based on the City's long-range travel demand model and the VMT Calculator is used for both existing and future employees in order to provide a fair comparison of new VMT generated by the Project. The distribution of employee work trips is based on arrangement of land use and population assumed in the long-range model and, therefore, does not depend on the current trip patterns of existing on-site employees as suggested in the comment.

Comment No. 26-157

Additionally, the DEIR's environmental setting acknowledges that the Project may have traffic impacts in Beverly Hills and West Hollywood: "The Project's Transportation Assessment approved by LADOT also accounts for more distant projects up to three miles away that could pose cumulative impacts on the transportation system, including projects within the adjacent cities of Beverly Hills and West Hollywood." (DEIR, p. III-8.) If the Project and other cumulative projects will have traffic impacts in other jurisdictions, the City needs to coordinate with those other jurisdictions-including West Hollywood and Beverly Hills-and conduct a traffic analysis using the thresholds adopted by those local governments. (See City of West Hollywood, Citywide Traffic & Mobility Study, available at <https://www.weho.org/city-government/city-departments/planning-and-development-services/long-range-planning/mobility-planning/citywide-traffic-mobility-study>.) The City of West Hollywood's traffic data further supports a low transit split for commuters (3% before COVID) and a much longer average commute than the DEIR reports for the Project-15.8 miles. (See also City of Beverly Hills, CEQA Thresholds of Significance for Transportation Impacts, available at <https://www.beverlyhills.org/cbhfiles/storage/files/4460592531431926648/RFP-20-270-2-ATTACHMENTCCITY'SCEQATHRESHOLDS.pdf>.)

Response to Comment No. 26-157

The CEQA-required VMT analysis uses the City of Los Angeles' VMT Calculator, which takes into account employee work travel through the streets of the City of Los Angeles and through the streets of adjacent jurisdictions.

CEQA gives cities the option to ask for an operational study of project impacts on key intersections, but this analysis is not required by CEQA. LADOT identified 31 intersections that should be studied for non-CEQA operational effects, all within City of Los Angeles city limits.

Figure III-1 and Table III-2 in Section III, Environmental Setting, of the Draft EIR detail the location and trip generation of the 68 related projects in the general vicinity of the

Project. Of that total, 25 are located in Los Angeles, 25 in West Hollywood, 17 in Beverly Hills and one that touches multiple city boundaries (the Metro D (Purple) Line extension, a transportation infrastructure project). Morning and afternoon peak hour trips from these related projects were added to the future trip levels to estimate a Future Without Project scenario. Figure 15 in the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the level of trips generated by these related projects and assigned through the Project study intersections. This figure shows that the related projects are responsible for the addition of approximately 200 morning peak hour trips per hour and approximately 356 afternoon peak hour trips per hour on Fairfax Avenue adjacent to the Project Site. Along Beverly Boulevard, the related projects add approximately 90 morning peak hour trips and approximately 162 afternoon peak hour trips adjacent to the Project Site.

In comparison, Figure 21 on page 21 of the Transportation Assessment (included in Appendix M.1 of the Draft EIR) shows that the Project would generate fewer than approximately one trip per minute westerly towards Beverly Hills or northerly towards West Hollywood along any street. In fact, trips from the related projects have a greater impact on the study intersections near the Project Site than Project trips would have on the distant intersections in West Hollywood or Beverly Hills. Project trips would utilize less than two percent of the capacity at the nearest major intersections in either Beverly Hills or West Hollywood and even that low level of traffic would dissipate the further away from the Project.

Comment No. 26-158

Existing parking for the Project Site is 1,510 for about 750,000 square feet. (DEIR, p. IV.K-22.) Proposed parking is 5,300 parking spaces for 1,874,000 square feet (setting aside the redefinition of the total amount of development). This increases the parking ratio from about 1 per 500 square feet to 1 per 350 square feet. Please clarify how increased parking is consistent with the City and regional goals of transit usage.

Response to Comment No. 26-158

Although the adequacy of a development's parking supply is not a CEQA impact, a response to this comment is included for informational purposes. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding how the parking proposed for the Project relates to applicable parking provisions. A key reason for the increase in the parking ratio is the increase in employee density. Currently, there are approximately 2,130 employees for 743,680 square feet of development for a ratio of 2.86 employees per 1,000 square feet. With the Project, there would be an estimated 7,832 employees in 1,874,000 square feet of development for a ratio of 4.18 employees per 1,000 square feet. The proposed parking ratio for the Project increases because the density of people on the Project Site increases and the land uses on the Project Site intensify (e.g., existing studio

to future office space). In conjunction with the on-site parking ratio, the Project also includes a TDM Program per Project Design Feature TR-PDF-2, which would reduce automobile trips and VMT and promote transit usage. Refer to pages IV.K-37 and IV.K-38, IV.K-44 through IV.K-55, and IV.K-74 and IV.K-75 of the Draft EIR, as well as Topical Response No. 11, Transportation Demand Management, for a detailed discussion of the Project's TDM Program.

Comment No. 26-159

The DEIR assumes that the Project could be built by 2026, and only applies the one-percent growth factor for traffic through 2026. (DEIR IV.K-24) That assumption is unsupported by citation to any evidence or any discussion. To the contrary, the DEIR is clear that Project build-out could extend to 2043.

The DEIR claims that the list of related projects used to analyze traffic impacts “is a conservative estimate that overestimates the actual traffic volume growth that would likely occur in the five years prior to the anticipated 2026 Project buildout year.” (*Id.* at IV.K-25.) However, the related projects list is missing projects, such as the Holocaust Museum, that will introduce traffic to the same immediate roadways. And, again, Project buildout can be as late as 2043. What are the related projects assumed through 2043? What will ambient traffic be in 2043 if Project buildout does not occur until then? Please provide a cumulative analysis for build out in 2043.

Response to Comment No. 26-159

The transportation analysis in Section IV.K, Transportation, of the Draft EIR provided a long-range cumulative analysis of transportation impacts in the form of the VMT analysis and determined impacts to be less than significant (see pages IV.K-81 to IV.K-83 of the Draft EIR). The LADOT VMT Calculator is based on the City's long-range cumulative travel demand forecast model (which in turn is based on the SCAG long-range model). The VMT Calculator, therefore, represents a long-range travel forecast based on land use projections and travel demand and pattern assumptions for the region. Thus, the CEQA transportation analysis presented in the Draft EIR accurately represents the long-range cumulative impacts of the Project.

The comment's discussion of related projects only applies to the non-CEQA operational analysis required by the City and not to the analysis required by CEQA. Page 3-8 of the LADOT TAG requires an operational analysis to be performed for likely operating conditions on the roadways near the Project during the best estimate of Opening Year for the Project. That was done for this Project assuming an Opening Year of 2026, consistent with LADOT policy.

The existing Holocaust Museum was open and operating when the trip counts for the Project were conducted, and, therefore, the existing Holocaust Museum trips were included in the analysis. In addition, the smaller expansion of the Holocaust Museum was investigated as a potential related project, but its peak hour trip generation was found to be minimal, and, thus, it was not included in the related project list by LADOT. Specifically, the 2007 Initial Study and the Mitigated Negative Declaration (MND) for the original Holocaust Museum was reviewed, and the project was found to have no significant traffic impacts on adjacent key intersection or residential street sections. The peak hour trip generation for the development of the original Holocaust Museum estimated nine total trips in the morning peak hour and 11 total trips in the afternoon peak hour, as reported by Crain & Associates in their full 2006 traffic study attached to the MND. The one percent annual growth in background traffic levels was assumed to occur between the pre-COVID traffic counts conducted in 2019 and the 2026 target year for Project completion. This one percent annual growth rate is used by LADOT throughout the City as a conservative estimate of potential growth.

The one percent annual growth in background traffic levels is the high end of the annual range for total traffic growth in the urbanized areas of the City of Los Angeles. This annual growth rate is utilized by LADOT to determine Future Base traffic levels which consist of:

Existing Conditions Traffic Levels + 1% Annual Ambient Growth Rate +
Related Projects Traffic = Future Base Conditions

This methodology yields a conservative (i.e., high) estimate of Future Base Opening Year traffic projections because the 1-percent annual growth rate already includes the related projects that happen each year. The Opening Year projections used in the traffic analysis for Year 2026 include both the 1-percent annual growth and the traffic to be generated by the 68 related projects discussed in Response to Comment No. 26-157. Thus, by adding the traffic from the 68 related projects described above to this background traffic growth rate, the analysis effectively “double-counts” the related project trips.

The related projects list includes a list of reasonably foreseeable related projects in the Project vicinity based on information from LADOT and the Department of City Planning. The non-CEQA operational traffic analysis assumed that all known related projects would be approved, constructed, fully occupied and operational by 2026. Related projects beyond the current list through 2043 are unknown and annual growth rate predictions to 2043 would be purely speculative. Long-range travel demand model projections developed by SCAG predict growth rates well below the one percent level for this area of the City of Los Angeles. The combination of related projects and one-percent assumed growth rate resulted in a 12.8 percent increase in background trips between existing traffic levels and Future 2026 Traffic without Project shown in Figure 21 (page 77) of the Transportation

Assessment (Appendix M.1 of the Draft EIR). The SCAG 2040 travel demand model predicts a smaller traffic increase compared to the existing traffic levels shown in the Transportation Assessment. Thus, an operational analysis using the SCAG 2040 base traffic levels would not have had substantially different results than the same analysis shown in the 2026 operational analysis in the Project Transportation Assessment.

Furthermore, as discussed on pages IV.K-80 to IV.K-81 of Section IV.K, Transportation, of the Draft EIR, with the exception of the freeway safety analysis, the Project's transportation impact analyses per the CEQA Guidelines Appendix G transportation thresholds and the TAG are not dependent upon the Project buildout date, and, therefore, the results and conclusions presented in the CEQA transportation analysis are equally applicable to a long-term buildout date. As such, a later buildout date would not affect the impacts or significance conclusions in the Draft EIR under CEQA. With regard to the freeway analysis, LADOT typically uses a lower ambient growth rate, such as 0.5 percent per year, recognizing that the combination of related project traffic and ambient growth generally overestimates traffic growth over a long timeframe. Nonetheless, even if traffic were to increase substantially by year 2043, the conclusions of the freeway safety analysis would not be affected, and no long-range significant impact from the Project would occur because the level of Project trips added to the freeway off-ramps is less than 25 peak hour trips at all but one ramp (i.e., SB US 101 and Highland Avenue off ramp) and that ramp has sufficient queue storage length to accommodate Project vehicles.

Note that it is the intent of the Applicant to complete the full buildout of the Project well before 2043.

Comment No. 26-160

Shouldn't the Mobility Hub should be analyzed as a "transportation project" under the City's Transportation Assessment Guidelines? (City of Los Angeles Transportation Assessment Guidelines at 2-13, available at https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.) Under that threshold, a transportation project will have a significant impact if it "induces substantial additional VMT." (*Id.*) It appears that the Mobility Hub could include substantial additional VMT and the DEIR should analyze the Mobility Hub itself as a transportation project and disclose those significant VMT impacts.

Response to Comment No. 26-160

The TAG defines a "transportation project" as a project that "increases vehicular capacity" and "can lead to additional travel on the roadway network, which can include induced vehicle travel due to factors such as increased speeds and induced growth." The Mobility Hub is not a transportation project as defined by the TAG, and in fact it serves the

opposite purpose. The Mobility Hub is an integral part of the Project's proposed TDM Program, as it would serve as a focal point of first-mile/last-mile transportation services for employees and visitors to the Project Site. Such services reduce single-occupant vehicle trips to and from the Project Site and, thus, reduce VMT. Refer to Topical Response No. 7, Mobility Hub, for a detailed description of the proposed Mobility Hub.

Comment No. 26-161

The DEIR states that the VMT analysis omits "trips to a non-residential destination originating from a non-residential use at the Project Site," "trips to a non-workplace destination originating from a residential use," and "trips to a non-residential destination originating from a non-residential use." (DEIR, p. IV.K-31.) The DEIR explains "those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment." But given the nature of this particular Specific Plan project, what is the evidence supporting the decision to exclude all of these different trips? The DEIR should assess the entire VMT generated by the Project, based on empirical data from the existing property operations and the full range of permitted uses.

As with the VMT data, the trip generation data fails to use actual data from the existing site. (DEIR, p. IV.K-35.) The public and decision-makers have no idea how many new cars will be added to the roads with this Project. This information needs to be clearly provided. Appendix M, Table 5 states that trip generation rates for production office uses are based on empirical data from another studio. As noted above, where is the evidence that this information is relevant or applicable to the Project? Does empirical data from the existing studio at the Project Site support the trip generation rates for production office? Why wasn't this data generated from the existing Television City users? Does the Television City data support the use of different rates for production office and general office at this Project Site? How are those different office uses defined? Without definition or existing data, there is no information in the DEIR supporting use of a different daily rate for office and production office at this Project Site.

How does the stage and production support space trip generation rates account for the varied permitted uses listed in the DEIR as allowed in those spaces? For example, does the stage trip rate account for all the audience participation shows? How? The Project Site currently has audience shows. What is the trip generation associated with existing audience shows? How does that compare with the assumed trip generation rate? Please provide information as to trip numbers and trip lengths for existing audience show guests. Since audience shows can add more than 5,000 guests a day to the projected 7,800 employees, the trip generation for the Project Site and related impacts are likely significantly understated.

Given the current and past extensive use of the Project Site stages for audience participation shows and that the Project includes use of all future stages for such shows, additional information is necessary to assess the transportation and parking impacts from such shows. Please provide information regarding the nature and extent of the audience shows for the last five years, including show schedules and numbers of guests. This information is not currently in the DEIR and would provide data for projecting future audience show use at the Project Site. Where is parking provided for audience show guests currently? How many times a day are shows taped? What times do audience show guests arrive? Are there more than one taping a day for different shows? What will be the rated audience show capacity of each of the proposed stages at the Project Site in the future? Will the Specific Plan include any restrictions on the number of shows per day? The hours of audience guest arrival and departure? The parking for such guests?

Response to Comment No. 26-161

Refer to Topical Response No. 8, Vehicle Miles Traveled, for a discussion of the different trip purposes and which are considered in the VMT analysis. As described therein, State guidance on VMT analysis from the OPR Technical Advisory suggests that for employment-based projects, “the focus can be on home-based work trips.” The other trip types are considered to be a relatively small component of overall VMT, and the OPR Technical Advisory recommends that the focus of VMT-reduction efforts be on trips between home and work. As such, the City’s significance thresholds were developed using the home-based work attraction trip type, just as the VMT Calculator’s analysis of work VMT per employee is based on that trip type for an apples-to-apples comparison.

Refer to Topical Response No. 10, Trip Generation, for a discussion on the validity of the empirical data used to estimate trip generation for production office, sound stage, and production support uses at the Project, including a comparison of actual driveway counts of existing trips at the Project Site to estimates using those trip rates. It also includes a detailed discussion of trip generation for studio audience members, including how they were accounted for in the Project trip generation estimates and that these trips represent a small percentage of the average daily total trip generation of the Project. The comments regarding the number of audience guests and that trip generation estimates are understated are incorrect. In regard to the information requested about audience shows, see Tables II-5 and II-6 in Topical Response No. 10.

See Response to Comment No. 26-156 for a discussion of why the empirical trip rates from the existing studio were not used as the sole basis for the Project trip generation estimates. Table 6 on page 81 of Appendix M.1, Transportation Assessment, of the Draft EIR provides a clear estimate of the number of net new trips to be added to the street system.

Refer to Topical Response No. 13, Parking, for information on the adequacy of the Project's proposed parking supply, including for studio audience visitors.

As discussed in Topical Response No. 3, Permitted On-Site Uses, five uses would be permitted under the Specific Plan (sound stage, production support, production office, general office, and retail) as well as the ancillary sitewide uses that support the studio and the five permitted land uses. These uses are fully accounted for in the transportation impact analysis in the Draft EIR.

This comment discusses several non-CEQA issues and questions regarding audience attendance. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-162

How will guests access the Project Site if they are parked off-site? Please explain how guest parking in residential areas will be prevented? How will community security be handled if guests park in the residential areas? Will there be nighttime access to studio shows? When will these shows depart? How will noise from audience show guests in the community be minimized? What access gates will be used for audience show guests? If guests are parked on-site, how will access (ingress and egress) be handled for multiple shows occurring at the same time? How will the site prevent back-up on the surrounding streets from guests entering the Project Site?

The DEIR should identify where off-site parking will be located and include in its analysis an assessment of impacts from the off-site parking. For example, the website for one of the live audience shows operated at the existing Television City facilities encourages audience members to park in The Grove parking structure. Is this the Project's plan going forward? What will happen to Farmers Market if audience show members park there and displace customers to Farmers Market? Could this lead to deterioration of Farmers Market?

Response to Comment No. 26-162

With respect to off-site parking, as discussed in Section B, Off-Site Parking, of Topical Response No. 13, Parking, the Project does not intend to implement an off-site parking program or negotiate an agreement with the City regarding off-site parking. The Project does not need off-site parking to meet its peak parking demands and, therefore, is no longer proposing off-site parking. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the proposed on-site parking supply.

Project driveway queueing distance is addressed in Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion. Queue lengths at the Project driveways were evaluated and summarized in Section 5B of the Transportation Assessment (included in Appendix M.1 of the Draft EIR) as part of the non-CEQA transportation analysis. As discussed therein, adequate queueing storage would be provided at each Project driveway to minimize the potential for vehicles to back out into the adjacent arterial streets.

Audience access is discussed in Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion. In addition, refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for information about audience shows, including the number and timing of audience shows.

Comment No. 26-163

The DEIR should be revised to include an analysis of potential traffic impacts resulting from cars circling nearby neighborhoods looking for parking. Neighborhoods will be forced to bear the burden of Project parking as drivers begin queuing on arterials, and residential streets will become clogged with drivers slowing to search for street parking. What are the air quality impacts from cars circulating looking for parking? What are the additional greenhouse gas impacts from this? What are the hazards to pedestrians, with drivers looking anywhere but directly in front of them searching for parking? Such impacts should be disclosed.

The secondary environmental impacts of people circling for parking spots are well known, and need to be studied here. (*E.g.*, Willa Ng, Circling for parking is terrible for cities. Let's put an end to it. (Sept. 21, 2016), available at <https://medium.com/sidewalk-talk/circling-for-parking-is-terrible-for-cities-lets-put-an-end-to-it-48c51921b776>; The Guardian, The hidden climate costs of America's free parking spaces (Nov. 5, 2021), available at <https://www.theguardian.com/environment/2021/nov/05/us-free-parking-spaces-climate-cost>.)

Please address the potential secondary impacts of the drivers potentially circling the Project Site looking for parking.

Response to Comment No. 26-163

The comment raises several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comment No. 26-162 explaining that off-site parking is no longer proposed by the Project. Refer to Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply and that spillover parking into adjacent

neighborhoods and properties is not anticipated. As such, the types of secondary environmental impacts speculated in the comment are not anticipated to occur.

Comment No. 26-164

The transportation section of the DEIR has a long section of Project Design Features. (DEIR, pp. IV.K-36–41.) These features are actually mitigation measures, and the analysis should have been done without assuming the PDFs in place and, then, if needed, mitigation measures imposed to address potentially significant impacts. Otherwise the true impacts of the Project are masked.

Similarly, the DEIR needs to analyze the Project Design Features (which are actually mitigation measures) for their own environmental impacts. The DEIR should evaluate the impact to traffic patterns of the proposed PDFs, including any localized congestion and related impacts.

Response to Comment No. 26-164

The PDFs included in Section IV.K, Transportation, of the Draft EIR include implementation of a Construction Traffic Management Plan (CTMP) as required by LADOT, a TDM Program that includes Project features to reduce automobile trips and resulting VMT, improvements to pedestrian facilities, a contribution to transportation system management improvements, and installation of left-turn signal phases at three intersections, among other things. Refer to pages IV.K-36 to IV.K-41 of the Draft EIR. These PDFs are a part of the Project and are not mitigation measures as incorrectly stated in the comment. Mitigation measures are required by CEQA to reduce identified impacts below an applicable threshold of significance. As shown in Section IV.K, Transportation, of the Draft EIR, the Project would result in less than significant transportation impacts, and thus no mitigation measures are required. The PDFs identified in Section IV.K, Transportation, of the Draft EIR were not the basis by which transportation impacts were determined to be less than significant. In fact, Appendix E of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the only PDF that was considered in the VMT analysis was the addition of bicycle parking and bicycle support facilities. The Project PDFs are largely non-construction actions that would reduce vehicle trips, improve safety, and encourage/enhance non-auto trips, and, thus, they would not result in their own environmental impacts.

Comment No. 26-165

When would the Mobility Hub be constructed? Is it required to be built when a certain amount of new square footage is constructed?

The DEIR's analysis of consistency with the Mobility Plan and Community Plan is inaccurate and should be redone. Below are some of the failures of the analysis of Project's impact analysis as it relates to the City's Mobility Plan and the Wilshire Community Plan. addressing these points in detail:

- The analysis in the EIR assumes that many commuters and visitors to the Project will use transit or carpool. But transit ridership is low and single-car passenger trips are high, and there is nothing in the EIR requiring transit ridership or demonstrating it will occur. The analysis should be redone with a realistic assessment of transit ridership based on empirical data.
- The analysis in the EIR assumes that pedestrian, bicyclist and motorist safety will be adequately addressed with basic improvements like crosswalks and signage. But this is an area the City has already identified as prone to accidents as part of the High Injury Network. And the Project has the potential to increase accidents and hazards by adding trips, increasing truck traffic, adding new driveways, and adding a fully signalized private street intersection. As explained in the LLG Report, the Project will significantly impact pedestrians. The proposed new driveways on Beverly Boulevard and The Grove Drive would adversely affect pedestrian movement to existing residential areas, recreational centers and schools. The analysis should be redone with an acknowledgment that this is an accident-prone area that the Project will make worse, and then make modifications, such as reducing proposed driveways, to improve pedestrian, bicyclist and motorist safety.
- The introduction of pedestrian circulation and access, along with a passenger loading area and new vehicular and truck access, along the southerly alleyway creates significant hazards for both pedestrians and motorists that is not disclosed or analyzed in the DEIR.
- The analysis ignores the Mobility Plan policy to limit truck movement to the arterial street network. The Project should be conditioned to limit truck activity to its existing driveways on Beverly Boulevard and Fairfax Avenue.

Response to Comment No. 26-165

Refer to Topical Response No. 7, Mobility Hub, for information on when the Mobility Hub functions would be implemented.

A detailed analysis of the Project's consistency with the transportation-related policies set forth in the Wilshire Community Plan is provided in Table IV.K-2 beginning on page IV.K-58 of the Draft EIR. Project consistency with additional applicable Wilshire Community Plan goals, objectives, and policies is discussed in Section IV.H, Land Use and Planning, of the Draft EIR and detailed in Table 2 of Appendix I of the Draft EIR. The Project would support many of the City's policies to maintain the community's distinctive

character, including promotion of multimodal transportation (e.g., walking, bicycling, driving, and taking public transit); improvements to Project Site access and circulation along a central commercial corridor; and the creation of a mobility-friendly environment through pedestrian-oriented building design and landscaping and the introduction of a Mobility Hub. Accordingly, the Draft EIR concluded that the Project supports the transportation-related goals and objectives of the Wilshire Community Plan. Further, a detailed analysis of the Project's consistency with the applicable policies in the Mobility Plan is provided in Table IV.K-1 beginning on page IV.K-47 of the Draft EIR. In summary, the Project is conceived as a pedestrian- and transit-oriented development that emphasizes accessibility by all travel modes, and the Draft EIR concluded that the Project would not conflict with the Mobility Plan. Thus, the comment that the Draft EIR's analysis of consistency with the Mobility Plan and Wilshire Community Plan is inaccurate and should be redone is incorrect.

Contrary to the comment, the Draft EIR does not assume or imply that "many commuters and visitors to the Project would use transit or carpool." As noted on page IV.K-74 of the Draft EIR, "the VMT analysis conservatively excludes most of those measures for the purposes of determining whether the Project could have a significant impact on VMT. In accordance with guidance from the City, the VMT Calculator analysis incorporates only two TDM measures: bicycle parking per LAMC requirements and secure bike parking and showers." Impacts with respect to VMT were determined to be less than significant. From a vehicular trip reduction standpoint, the Draft EIR assumed that only 15 percent of the total employee person-trips would use transit, walk, bike, and carpool to travel to/from the Project Site. The Project is expected to exceed these non-auto mode splits given the extensive TDM Program planned for the Project Site. Refer also to Topical Response No. 11, Transportation Demand Management, and Topical Response No. 10, Trip Generation.

Regarding traffic hazards, please refer to Response to Comment No. 9-29.

As concluded in the Initial Study, the Project would have a less-than-significant impact related to increased hazards due to a design feature, and no further analysis of this topic was required in the Draft EIR. Nonetheless, a detailed analysis of the Project access plans as it relates to hazards due to geometric design features, including safety, operational, or capacity impacts under Threshold T-3 was provided in Section 4C of the Transportation Assessment (included in Appendix M.1 of the Draft EIR). As detailed therein, all Project access points would be designed to provide adequate sight distance and, where necessary, pedestrian refuge areas to limit any potential vehicular-pedestrian and vehicular-bicycle conflicts. Two of the driveways on Beverly Boulevard would function as secondary vehicular access and limited to right-turn in/out only with minimal traffic usage. The new driveway on The Grove Drive would incorporate the existing pedestrian crossing across The Grove Drive and improve this location with a full traffic signal. In addition to improvements surrounding the Project Site perimeter, the Project would

contribute toward several off-site improvements that would benefit pedestrians, vehicles, and the surrounding neighborhood, including pedestrian safety improvements in the Study Area as part of Vision Zero, traffic calming measures and neighborhood bicycle features, traffic signal upgrades, etc. The Project access and improvements would not preclude or interfere with any City implementation of any future improvements.

The commenter reaches the conclusion that the Project would significantly impact pedestrians without providing any technical analysis or support for that conclusion. The Draft EIR transportation analysis investigated pedestrian safety and specifically the design of the Project driveways to conclude that safe driveways designs, and enhanced pedestrian sidewalks and parkways would be provided to address any potential pedestrian safety issues.

The Project's proposal to provide Project Site access along the Southern Shared Access Drive would not create a significant safety hazard. Vehicles and pedestrians circulate on the Southern Shared Access Drive today, including to access properties to the south, and there is existing pedestrian access from the southern portion of the Project Site. If a new pedestrian gate to the Southern Shared Access Drive is constructed in the southeast portion of the Project Site, it could be accompanied by a sidewalk along the south side of the parking structure connecting the pedestrians entering/leaving the Project Site to The Grove Drive, thereby increasing pedestrian safety over existing conditions. The Project has joint right of access to the Southern Shared Access Drive and the two vehicular driveways proposed provide access to the southeast quadrant of the Project Site. As discussed on page IV.K-57 of the Draft EIR, along portions of the southern property line, sidewalks, screening, and/or planting areas would be introduced. In particular, along the Southern Shared Access Drive, a 10-foot-wide frontage would be provided.

This comment regarding Mobility Plan policy is assumed to refer to Mobility Plan, Policy 1.8—Goods Movement Safety, which states “Ensure that goods movement sector is integrated with the rest of the City / transportation system that does not endanger the health and safety of residents and roadway users.” The Mobility Plan defines goods movement as “the transport of for-sale products from their manufacturing origin to their final destination where they will be sold. Moving goods can involve many different types of transport such as airplanes, cargo ships, trains, and trucks.” This policy is not applicable to the Project as the trucks that access the Project Site are primarily production vehicle trucks, commercial trucks, etc., and not related to goods movement.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, the transportation analysis does not need to be redone, as incorrectly suggested by this comment.

Comment No. 26-166

- The analysis in the EIR gives short shrift to the Wilshire Community Plan, including its policies related to ingress and egress points, street widening, and, in particular, acceptable levels of service (LOS) analysis. LOS remains important under the Community Plan, and the Project will add thousands of daily trips to already overburdened streets, and the analysis fails to account for many trips by permitted uses. The DEIR's analysis of the Community Plan policy on LOS is inaccurate. The DEIR claims to not conflict with the policy when its own data shows that the Project will degrade LOS conditions at the intersections of Fairfax Avenue and Beverly Boulevard and Stanley Avenue/The Grove Drive and Beverly Boulevard. The analysis in the EIR should be redone to address the Project's impacts on LOS as required by the Community Plan.

Response to Comment No. 26-166

Contrary to this comment, the Draft EIR provides a detailed analysis of the applicable objectives and policies of the Wilshire Community Plan, including those related to transportation. Refer to Table IV.K-2 commencing on page IV.K-58 of Section IV.K, Transportation, of the Draft EIR. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

Table 18 (pages 162 and 163) of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the results of the LOS analysis with and without the Project. Of the 62 peak hours tested at the study intersections under Year 2026 full buildout conditions, the Project vehicles and the resulting roadway improvements result in two intersections improving from LOS E to LOS D or LOS B. In addition, no additional intersections degrade to LOS F as a result of the addition of Project vehicles.

According to CEQA, a project does not need to be in perfect conformity with each and every policy. A project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Therefore, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the inconsistency itself would result in a direct physical impact on the environment.

Comment No. 26-167

Traffic/Access Issues. As noted in the attached LLG Report, the traffic and access issues are inadequately analyzed in the DEIR. The DEIR says that it will have 7,752 non-retail employees. (DEIR, p. IV.K-74.) This number appears to ignore significant trip generation and VMT related to the Project. Does it include contractors working on production and third-party production companies filming at the stages? As is typical in the entertainment

industry, many people working at a studio site are not “employees” but are contractors or third-party production companies. Are these people counted within the category of the 7,752 non-retail employees? What about guests and audience participants? These vehicle trips and their VMTs do not appear to be captured in the analysis. Are production trucks and vehicles serving the studios (production areas and basecamps) included in the analysis? If these categories are not included, then the analysis substantially undercounts the total VMT the Project will generate. Based on a review of the trip generation and the VMT analysis, it appears they are not all included. The VMT analysis for this Specific Plan project needs to look at all trips the Project will generate and their associated miles traveled and not just those of “employees.”

Even assuming the underestimated trips, the Project will cause numerous safety impacts that were not disclosed in the DEIR. The DEIR needs to be redone to properly disclose and mitigate the impacts.

Response to Comment No. 26-167

The employee estimates for the Project are inclusive of all types of on-site employment, including contractors and third-party production companies filming on-site. The non-retail employment estimates were based on occupancy levels at the sound stages, production support, production office and general office land uses within the Project Site, which include the range of employees cited in the comment. The employee totals do not include guests or studio audience participants, as they are not employees and do not travel to and from the Project Site regularly.

The Project trip generation estimates account for studio audience visitors, production trucks, and other studio vehicles, as those are inherent in the rates used in the estimates. Refer to Topical Response No. 10, Trip Generation, for more information about Project trip generation estimates.

The VMT analysis used the Project trip generation estimate as a key input. Refer to Topical Response No. 8, Vehicle Miles Traveled, for a discussion of the different trip purposes and which trips are considered in the VMT analysis. As described therein, State guidance on VMT analysis from the OPR Technical Advisory suggests that for employment-based projects, “the focus can be on home-based work trips.” The other trip types are considered to be a relatively small component of overall VMT, and the OPR Technical Advisory recommends that the focus of VMT-reduction efforts be on trips between home and work. As such, the City’s significance thresholds were developed using the home-based work attraction trip type, just as the VMT Calculator’s analysis of work VMT per employee is based on that trip type for an apples-to-apples comparison. The VMT analysis was completed in compliance with CEQA and LADOT requirements and comprehensively accounted for all potential environmental impacts of the Project. The

Draft EIR concluded that the Project's potential transportation impacts would be less than significant, and no mitigation is required.

The comment also refers to the Project causing "numerous safety impacts" without citing specifics. Refer to Response to Comment No. 12, Safety and Congestion, for a discussion of the Project's safety. Also refer to Response to Comment No. 9-29 regarding the Project's less-than-significant impacts regarding hazards due to a geometric design.

Comment No. 26-168

Currently the site has vehicular access points on Fairfax Avenue and on Beverly Boulevard. There currently is no vehicular access to the Project Site from Grove Drive. All of the Project Site traffic currently enters from Fairfax Avenue and the Beverly Boulevard driveways, with the main entrance on Beverly Boulevard. The Project Site today has approximately 53% of its frontage on Beverly Boulevard, 31% on Fairfax Avenue, and 16% on Grove Drive. Yet, the Project is proposing to add four new access points to the site, with the primary access for the entire Project be located by way of a new signalized T-intersection on Grove Drive across from the Holocaust Museum. The Project also proposes vehicular access from the private alleyway that itself is accessed from the Grove Drive. Currently the Project Site has no access from Grove Drive and there is no signalized intersection at the location of the proposed new entrance.

As described above and in the LLG Report, the Project's estimate of traffic volumes on Grove Drive are unsubstantiated. Further, based on the DEIR and applicant data, approximately 60% of the Project's parking spaces will be located on Grove Drive yet 40% of the total Project traffic will supposedly access the Project from Grove Drive. Given that 60% of the parking will be located on Grove Drive, how will the Project manage to restrict Project traffic on Grove Drive to not more than 40% of total traffic volumes?

Response to Comment No. 26-168

The assumption that the parking supply would be split such that 60 percent of the parking will be accessed from The Grove Drive is incorrect. Any parking located along The Grove Drive would also be accessible from the signalized entrances along Beverly Boulevard and Fairfax Avenue. Figure 22 on page 80 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that 32 percent of the trips entering/leaving the Project Site in the peak hours would use The Grove Drive signalized entrance, 32 percent would use the signalized entrance on Beverly Boulevard, and 21 percent would use the Fairfax Avenue driveway. The remaining 15 percent of the trips would use the unsignalized driveways serving the Project Site.

The estimate of the percentage of vehicles approaching the Project Site from each direction was used to estimate the distribution of trips using each Project driveway. Typically, vehicles approaching a site will use the closest and most convenient driveway to enter a site, if that site provides good internal circulation. That travel pattern, plus the fact that The Grove Drive has more available capacity than either Beverly Boulevard or Fairfax Avenue, influenced the assignment of Project trips to the various driveways.

It should also be noted that the assignment of Project trips to individual driveways does not affect the calculation of VMT, and, thus, the CEQA conclusions of less-than-significant transportation impacts are not altered by the distribution of Project trips.

Comment No. 26-169

The Grove Drive is a Collector Street that exists only from 3rd Street on the south to Beverly Boulevard at the north; beyond Beverly Boulevard it becomes Stanley Avenue, a residential street. The Grove Drive is designated part of the Pedestrian Enhanced Network and portions are designated part of the Neighborhood Enhanced Network and Bicycle Enhanced Network. Given the limited frontage of the Project Site on Grove Drive, the designations of the street in the Mobility Plan and the existing uses, the level of Project traffic, including truck traffic, directed to the Grove Drive (without consideration of the likely greater trips unaccounted for in the DEIR) conflicts with existing City plans and policies and will create significant hazards.

Response to Comment No. 26-169

There are no unaccounted Project trips along The Grove Drive. That assertion is based on an incorrect assumption by the commenter as explained in Response to Comment No. 26-168.

Figure 16 on page 51 and Figure 21 on page 77 of the Transportation Assessment (Appendix M.1 of the Draft EIR) show the Future without Project and the Project Traffic Volumes, respectively. In the afternoon peak hour, The Grove Drive is expected to carry approximately 845 vehicles per hour just south of Beverly Boulevard and approximately 852 vehicles per hour north of 3rd Street. The Project would add approximately 145 trips per hour south of Beverly Boulevard and approximately 154 trips per hour north of 3rd Street—or about a 15-percent traffic increase in either location. Upon full buildout, the Project would, thus, represent a small percentage of the traffic levels on The Grove Drive, with the majority of traffic on the street destined for The Grove shopping center or The Original Farmers Market. Even with the increased trips from the Project, The Grove Drive will still be well below its ultimate roadway capacity. The Grove Drive will carry approximately 1,000 vehicles per hour (vph) in the afternoon peak hour as compared to a capacity of approximately 2,720 vph for a volume/capacity utilization of 37 percent—even

after the completion of the Project. At the same time both Beverly Boulevard and Fairfax Avenue would be carrying approximately 2,720 vph against a capacity of approximately 3,400 vph for a volume/capacity utilization of 80 percent.⁷² Clearly, The Grove Drive has more available capacity than either Beverly Boulevard or Fairfax Avenue.

The Grove Drive, as a Collector Street, is an appropriate street classification for a street collecting traffic from an adjacent land use along that street and delivering that traffic to the arterial street system—in this case to Beverly Boulevard or 3rd Street. Under the Project, The Grove Drive would operate in exactly the same manner that the street currently collects traffic from The Grove shopping center and delivers that shopping center traffic to Beverly Boulevard or to 3rd Street. LADOT's Driveway Design guidelines (*Manual of Policies and Procedures, Section 321*) state that a project should provide access from non-arterial streets whenever possible. With nearly 400 feet of Project Site frontage on The Grove Drive, those guidelines allow up to two access points. Contrary to the comment, the Project's use of The Grove Drive would not conflict with City plans and policies and would not result in significant safety hazards. Refer to Response to Comment No. 9-29 regarding hazards.

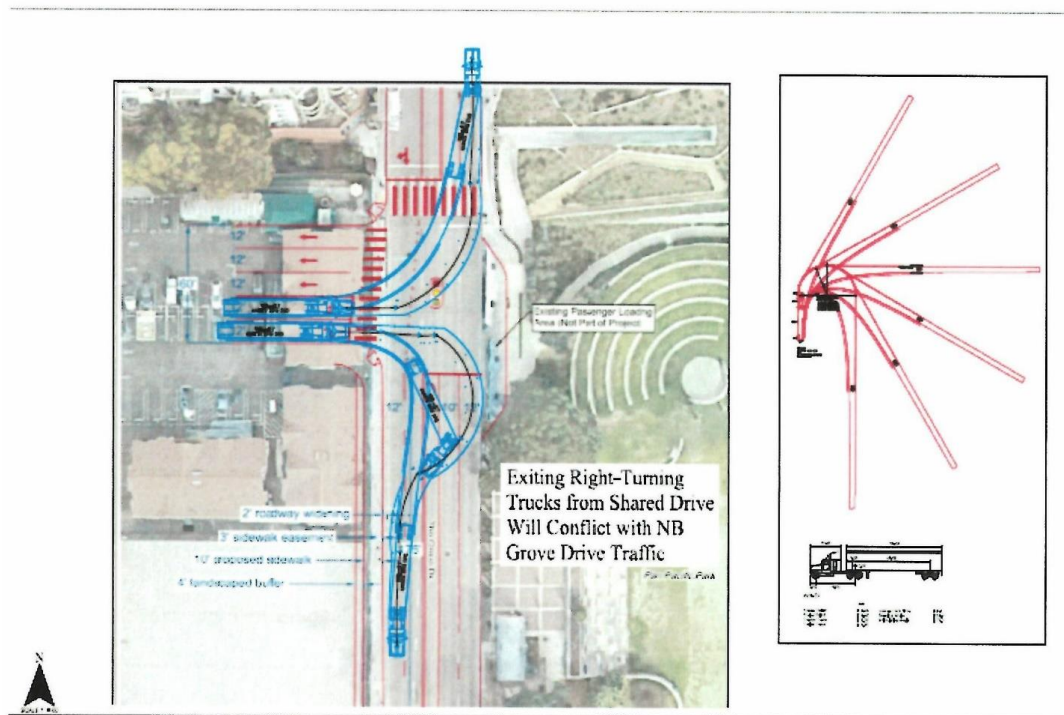
Comment No. 26-170

The new signalized intersection on Grove Drive introduces a major access point on a T-intersection where the eastern edge of the T-intersection has a curbside drop-off/pick-up lane that serves the Holocaust Museum, predominantly used by buses. (DEIR, p. IV.K43.) This new signalized intersection will create a major safety issue with the curbside lane, especially the buses, many with children, loading and unloading in what is a new major intersection. How is this not an increase in hazards due to a geometric design feature—"dangerous intersection"? In addition, the proposed new northbound left-turn lane at this intersection would line up directly with the oncoming southbound through line. To avoid a collision, the vehicles would need to transition approximately 10 feet to the west. Large trucks, including 18-wheel tractor trailers, are proposed to navigate this intersection, with its hazardous design across from a major pedestrian drop-off. The DEIR has no analysis of this condition.

In addition, large production trucks will not be able to safely access through this T-intersection or the private alleyway without sweeping into other traffic lanes. LLG's analysis for trucks entering and exiting the Project at this intersection and the private alleyway indicates trucks will encroach into outgoing traffic lanes. See below for depictions of trucks exiting the Project at the T-intersection on Grove Drive and the private alleyway.

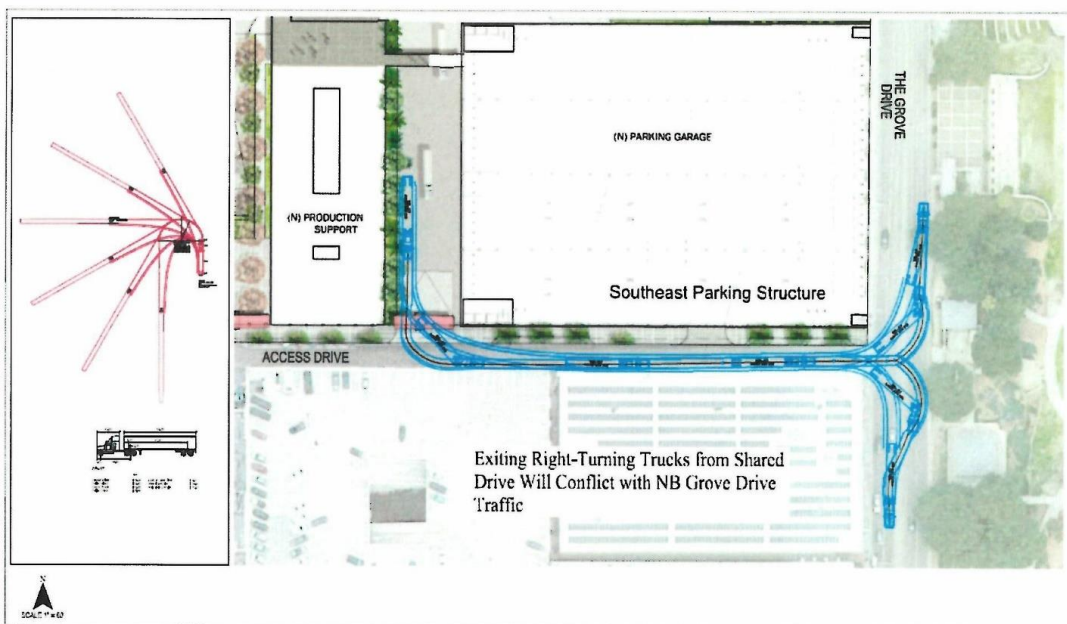
⁷² Roadway capacities based on average per-lane capacity as reported in the *Highway Capacity Manual, 6th Edition*, (Transportation Research Board, 2016).

(See also LLG Report Figures 6a and 6c showing the encroachment from trucks entering the Project.) This is clearly a significant traffic hazard.



SOURCE: GIBSON TRANSPORTATION CONSULTING INC.

Figure 6D
Main Entrance Truck Maneuvering Analysis - Outbound
AASHTO (US) WB-67
TVC 2050 Project



MAP SOURCE: GOOGLE EARTH

Figure 6E
Truck Maneuvering Analysis - Outbound
AASHTO (US) WB-67
TVC 2050 Project

Construction and operational production trucks should not be permitted to access the site from The Grove Drive.

Response to Comment No. 26-170

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, for a discussion of treatment of The Grove Drive near the proposed Project driveway. In addition, as shown in Figure II-14 on page II-1153 with Response to Comment No. 26-E.4-16, below, the southbound alignment has been addressed in the design of The Grove Drive. The 10-foot westerly transition mentioned in the comment has been eliminated.

In terms of the truck turning movement diagrams shown above, these represent turning radius tests for a WB-67 truck, which is the largest truck allowed on California roadways and, therefore, is a very infrequent occurrence at the Project Site. See further discussion of truck turning movements in Response to Comment No. 26-E.4-15. Please note that the Project is proposing a two-foot roadway widening on The Grove Drive to provide a dedicated northbound left-turn lane into the Project driveway.

The curbside bus drop-off lane for the Holocaust Museum will work in coordination with the proposed traffic signal and the signalized crosswalk. The student drop off would be on the sidewalk side of the buses and the students will enter the Museum without ever crossing the street or being affected by the traffic signal.

The proposed signalized T-intersection poses no hazardous geometric design condition because it would be designed as a standard intersection familiar to motorists and pedestrians alike. The signalized driveway would be designed to meet LADOT standards for both intersection and driveway radius designs, and, therefore, there are no safety concerns associated with this location. Thus, the comment that this is an unsafe intersection is incorrect. Refer to Response to Comment No. 9-29 regarding hazards and safety.

Comment No. 26-171

Further, the DEIR fails to disclose the impacts from vehicle queuing. To begin with, the DEIR does not analyze vehicle queuing at all of the Project Site driveways, including the southern alleyway which the Project inappropriately proposes for vehicular and truck access and passenger loading. The City's guidelines for conducting transportation assessments requires evaluation of vehicle queuing at all primary project driveways and unsignalized intersection that are adjacent to the project or expected to be integral to the project's site access and circulation. Given the City's own guidelines, why did the DEIR not analyze the vehicle queuing for the Project access at Fairfax Avenue south of First Street,

Beverly Boulevard west of Genessee [sic], Beverly Boulevard across from Spaulding and at the southern alleyway? This analysis needs to be completed, utilizing supportable trip generation estimates and distribution, including truck and guest traffic.

The queuing analysis that was completed shows that the Project will increase queue lengths on Grove Drive that will block the proposed new T-intersection and private driveways. This is a traffic hazard that can lead to additional accidents that is not adequately addressed in the DEIR. Further, the level of queuing disclosed likely is understated for the reasons stated above and because there is no limitation on the size or number of parking spots permitted in the proposed parking garage.

Given the existing Project Site access, the nature of The Grove Drive, the various City plans and policies, and the hazardous conditions that the proposed access from The Grove Drive would create, the Project should not include the proposed access from The Grove Drive. If any access is permitted from The Grove Drive, then it should not permit truck access and should be designed to minimize queue lengths by locating Project traffic queuing within the Project Site, providing automated clearance for daily entrants, and directing visitors to the Project's main entrance on Beverly Boulevard. Further, no vehicular access should be permitted from the private alleyway.

Response to Comment No. 26-171

As summarized in the comment, the City's (specifically LADOT's) *Transportation Assessment Guidelines* (updated August 2022) require evaluation of vehicle queueing at "all *primary* project driveways" and "unsignalized intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan." The Project proposes three signalized driveways—on Fairfax Avenue at 1st Street, on Beverly Boulevard at Genessee Avenue, and on The Grove Drive. All other access points are secondary, and while they may serve specific purposes to the Project's circulation plan, they would carry small fractions of the trips and would have minimal queuing. Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, for a detailed discussion of queuing at Project driveways.

The comment incorrectly suggests that hazards related to offsite vehicle queuing were not adequately addressed in the Draft EIR. As noted in the comment, the non-CEQA analysis in the Transportation Assessment (Appendix M.1 to the Draft EIR) identified long queues on The Grove Drive extending to Beverly Boulevard. Importantly, the queues would extend beyond the proposed Project driveway on The Grove Drive even under Future without Project Conditions; as shown in Table 19 on page 164 of the Transportation Assessment (Appendix M.1 of the Draft EIR), the Project would increase the northbound right-turn queue by less than approximately 10 percent compared to Future without Project Conditions. The operational effects of the additional queuing have been fully disclosed in

the Transportation Assessment in Table 19, and LADOT's review did not find this small increase in queues on The Grove Drive to be an operational effect. It is customary that streets at times have queues, and queues do not themselves present safety or hazard issues, especially on non-arterial streets and at low speeds.

The comment expresses concern that the queuing on The Grove Drive could be underestimated because the maximum number of parking spaces in the southeast parking structure number has not been set, and a larger garage could lead to longer queues. This statement ignores the fact that the parking spaces in the southeast parking structure could be accessed from all three signalized entrance/exits, so a longer queue on The Grove Drive would tend to send vehicles to one of the other two exits, and the system would balance.

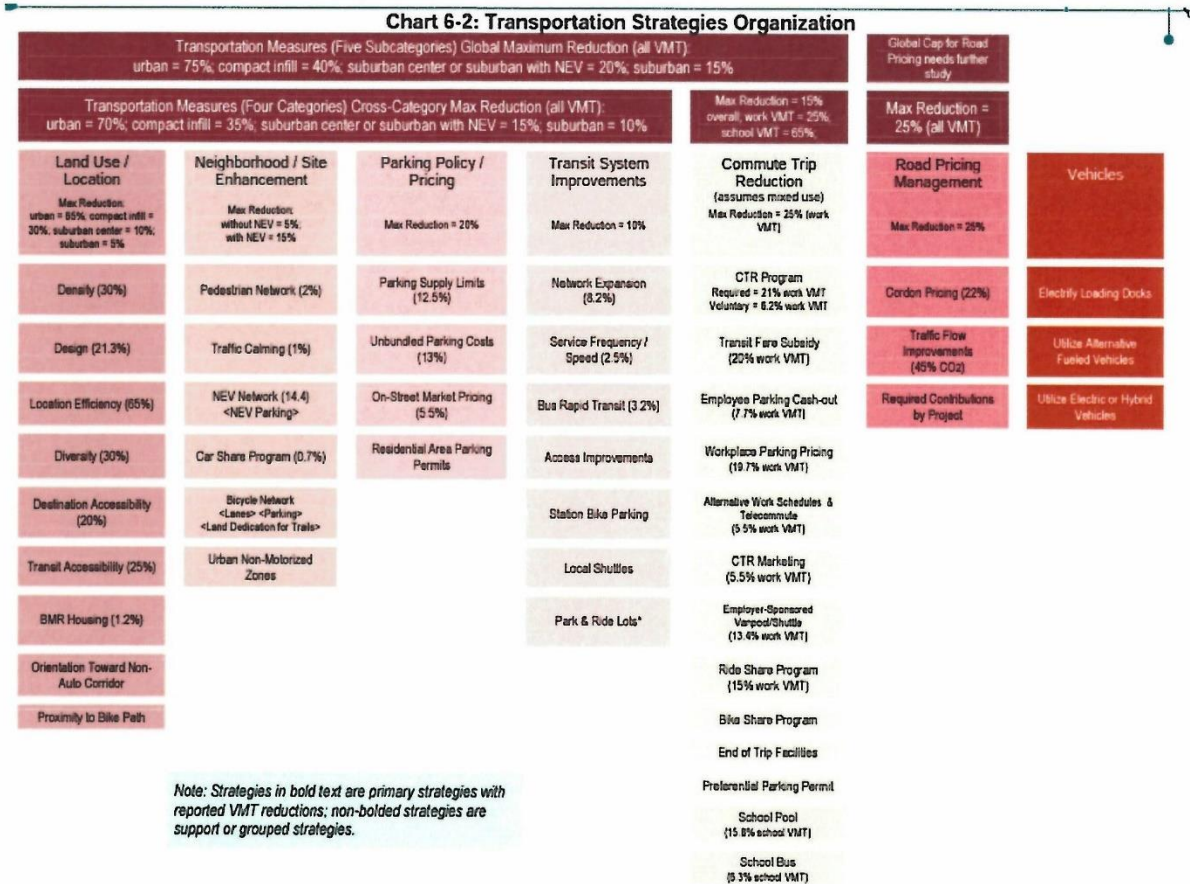
Refer to Response to Comment No. 9-29 regarding hazards and queues.

Refer to Topical Response No. 12, Safety and Congestion, for a discussion of the importance of using The Grove Drive as a Project access point. The comments regarding the use of The Grove Drive do not relate to the CEQA analysis in the Draft EIR, and no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-172

The DEIR finds that the Project has less-than-significant operational traffic impacts. But as discussed above, the conclusions are not supported. The City should analyze all feasible mitigation measures to reduce VMT impacts and a reasonable range of feasible alternatives. There are extensive existing resources available describing potential mitigation measures for VMT impacts. One of those sources is the California Air Pollution Control Officers Association (CAPCOA) report "Quantifying Greenhouse Gas Mitigation Measures." (Available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.)

An excerpt listing potentially effective VMT mitigation measures is depicted below, and the CAPCOA report is incorporated by reference. Please analyze each of the VMT reduction measures listed in this report, including those in the table below, for feasibility and effectiveness at the Project.



Whatever mitigation measures the Project uses, it will be important to have measurable, quantified targets the Project must meet.

Response to Comment No. 26-172

Refer to Topical Response No. 8, Vehicle Miles Traveled, for a discussion of the adequacy of the Project's VMT analysis presented in Section IV.K, Transportation, of the Draft EIR and its conclusion that the Project would not result in any significant VMT impacts and, thus, would not require mitigation measures. Nonetheless, the Project would implement a TDM Program to further reduce VMT. Refer to Section A, TDM Effects on Trip Generation, of Topical Response No. 11, Transportation Demand Management, which discusses the effectiveness of the proposed transit and TDM Program elements of the Project. The CAPCOA analysis requested in the comment is presented in Table II-11 in Topical Response No. 11.

The development of a TDM Program would be a Condition of Approval for the Project and would include the trip reduction targets and monitoring requirements that are in place at the time of the Project's approval. As demonstrated in the comprehensive VMT analysis within the Draft EIR that was completed under the direction of LADOT and in

accordance with OPR guidance and CEQA, the Project would not result in significant impacts related to VMT. As such, mitigation measures and alternatives to address VMT impacts are not required.

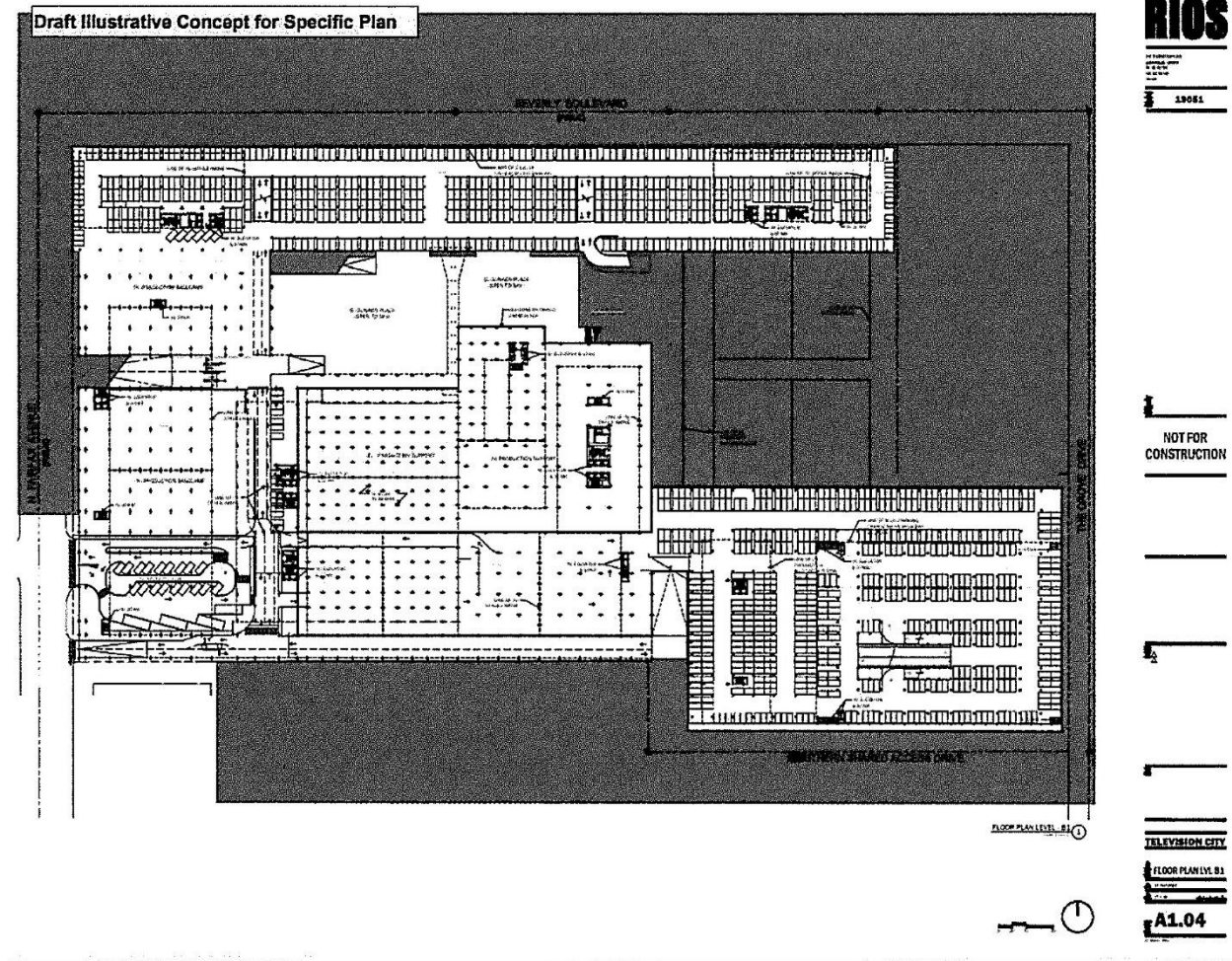
Comment No. 26-173

L. Utilities

DEIR Fails to Analyze all Utility Impacts

The various utilities section use conflicting assumptions without explanation. This is another example of the failure of the DEIR to provide an accurate, stable, and finite project description. In addition, as noted throughout this document, the DEIR fails to properly account for the impacts associated with basecamp, below grade production zones, and Mobility Hub uses.

Within the Utilities water analysis, the DEIR notes that there will be 194,600 square feet of basecamp uses and 36,000 square feet of Mobility Hub uses resulting in impacts to water demand and wastewater. It is unclear how these square footage were calculated. Does the Specific Plan include a maximum square footage for such uses? As the DEIR does not include a precise development plan or the Specific Plan, it is not possible to confirm the accuracy of this assumption. However, it appears inconsistent with the site plans included with the Project applications, included below. The DEIR should include information as to how these square footage numbers were generated and whether they reflect the maximum amount of square footage of such uses.



Response to Comment No. 26-173

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for detailed information on how the Project Description is accurate, stable, and finite. Refer to Response to Comment Nos. 5-3 and 26-5 regarding how the proposed Specific Plan is consistent with Section II, Project Description, of the Draft EIR and, thus, would not result in any environmental impacts that have not already been evaluated in the EIR.

This comment does not include any evidence to support the assertion that the utilities analyses utilize conflicting assumptions. Rather, all of the utilities analyses are based on the same assumptions included in Section II, Project Description, of the Draft EIR. As shown in Tables IV.M.1-5 and IV.M.1-6 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, and Tables IV.M.2-2 and IV.M.2-3 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR and in the Utility Report included as Appendix O of the Draft EIR, the water and wastewater analyses account for basecamp areas at and below Project Grade, the proposed Mobility

Hub, and covered parking areas. As such, the utilities analyses do not include conflicting assumptions.

In addition, active production activities would not occur in the parking and basecamp areas below Project Grade with the Project. Refer to II-4(c) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As stated in the Draft EIR, these below-Project Grade areas would be limited to circulation, parking, and basecamp. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, for a discussion that these activities do not separately generate intensity and therefore are not counted as floor area by the City.

In addition, as part of this Final EIR, the energy analysis for the Project was updated to account for the City's recent Ordinance No. 187714 adopted in December 2022 (after the Draft EIR was released). This Ordinance requires that as of April 2023, all newly constructed buildings must be electric (with some exceptions). As shown in the updated energy analysis included in Appendix FEIR-9 of this Final EIR, all of the Project components, including basecamp, the Mobility Hub, and covered parking, have been accounted for.

The net increase of approximately 194,600 square feet of basecamp uses and 36,000 square feet of Mobility Hub space are based on the Conceptual Site Plan that is included in Section II, Project Description, of the Draft EIR. While already analyzed in the Draft EIR, the specific square footage has been added in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would include a regulatory framework for implementation of the Project and a discretionary process that includes additional CEQA compliance review for future Project changes that would potentially exceed the environmental impacts analyzed in the EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 26-174

Oddly, there is no indication that the Project considered any basecamp and Mobility Hub uses in its analysis of electricity or natural gas usage. This is inconsistent with the assumption in the water analysis and what appears to be the ability of Project to have significant basecamp and production areas Project Site in the subgrade level and parking structures without counting it as floor area.

The DEIR states that "LADWP confirmed in its will-serve letter... that the Project's estimated electricity demand could be met by the existing electrical infrastructure in the Project area..." Similarly, the DEIR states that "SoCalGas confirmed in its will-serve letter... that the Project's estimated natural gas demand could be met by the existing natural gas infrastructure in the Project area." However, these conclusions are only

relevant if the information LADWP and SoCalGas assessed was complete. Based on the information available in the DEIR and Appendices, it does not appear that electricity and natural gas demand from basecamps, below grade production zones and the Mobility Hub were included in the total demand sent to LADWP. Page 66 of Appendix O includes the calculations for electricity use for the Project. In the chart labeled “Land Use Exchange-Max Electricity Demand Scenario,” there are no rows showing demand from the basecamps or Mobility Hub. Similarly, in the table labeled “Land Use Exchange-Max Natural Gas Usage Scenario,” there are no rows showing demand from the basecamps or Mobility Hub. However, it is clear that these uses will have electricity demand and will likely have natural gas demand as well. As indicated in the images below, the basecamps and Mobility Hub will have electricity demand. Thus, the conclusions from LADWP and SoCalGas that they will be able to serve the Project are not based on accurate information.



Response to Comment No. 26-174

Refer to Response to Comment Nos. 26-E.1-27, 26-E.1-28, and 35-53 for a detailed discussion regarding electricity usage associated with the basecamp areas and the Mobility Hub, the CalEEMod land use modeling, and how the EIR analyzed the potential physical environmental impacts of all proposed uses, areas, and activities. In response to Draft EIR comments and the adoption of the City's new all-electric buildings ordinance (Ordinance No. 187714, effective January 2023), the electricity analysis has been further clarified in this Final EIR to specifically account for the basecamp areas and is included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). The updated LADWP will-serve letter is also provided in Appendix FEIR-9 of this Final EIR and confirms that the Project's estimated electricity demand could be met by the existing electrical infrastructure in the Project area and confirms the Draft EIR's less-than-significant impact conclusions for electricity and natural gas.

As discussed in Response to Comment No. 26-175, the service letter submitted to SoCalGas, which is included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) for informational purposes, includes the same information about the Conceptual Site Plan that is included in Section II, Project Description, of the Draft EIR. As stated in this comment, the Draft EIR confirms on page IV.M.3-13 of the Draft EIR that "SoCalGas confirmed in its will-serve letter ... that the Project's estimated natural gas demand could be met by the existing natural gas infrastructure in the Project area." Compliance with the City's new all-electric buildings ordinance would prohibit the use of new natural gas under the Project, with certain exceptions. Thus, the natural gas usage evaluated in the SoCalGas will-serve letter would be considered conservative, as it overestimates the potential natural gas usage under the Project.

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and to Response to Comment Nos. 5-7 and 26-121 regarding the basis for the definition of floor area, how all of the uses and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area, and how no active production activities would be located in the parking and basecamp areas below Project Grade.

Comment No. 26-175**DEIR Defers Analysis of New Lines, Connections, and Upgrades**

The DEIR states that "the Project would include the installation of any necessary new lines, connections, and upgrades required by LADWP to ensure adequate service to the Project Site." (DEIR, IV.M.3-12.) However, the DEIR does not describe this work or the impacts

associated with it. Because the Project is committing to undertake this work, the DEIR should be revised to identify and analyze this part of the Project. There is no analysis provided as to needed upgrades of infrastructure necessary for the Project.

DEIR Fails to Include Necessary Information

The DEIR includes the “will-serve” letters from LADWP and SoCalGas but fails to include any of the letters that the Project sent to those entities. Therefore, it is impossible for the public or decision-makers to know what information was provided about the Project. Given that the DEIR has no stable and finite definition of the Project, it would be helpful to see what LADWP and SoCalGas were provided. Also referenced in the Appendix O to the DEIR are two letters regarding wastewater impacts which were not included in the Appendix O. Please provide the following letters referenced in the Utility Report Appendix O:

1. December 9, 2021 Letter to the City regarding wastewater evaluation.
2. June 18, 2021 Letter to the City regarding wastewater evaluation.
3. December 7, 2021 Letter to LADWP regarding electric service.
4. Undated “inquiry” to SoCalGas referenced in SoCalGas’s July 31, 2021 Will-Serve letter.

PDFs Are Disguised Mitigation Measures

WAT-PDF-1 is actually a mitigation measure and, thus, the DEIR’s Water Supply analysis should not account for any reductions of such a measure. Further, the Water Supply Analysis (“WSA”) appended to the DEIR includes the following additional commitment that should be included as mitigation measures.

“The Applicant has also committed to comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No. 183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as applicable:

- Cistern—captures stormwater runoff as it comes down through the roof gutter system.” (DEIR, Appendix N, p. 52.)

The Project’s Water Use

The DEIR explains that existing total water use is only 44,662 gallons per day. With Project buildout, total water use will be 302,424 gallons per day—a six-fold increase,

although the Project square footage as represented in the DEIR is not increasing six-fold. Please explain how the DEIR concluded this is a less than significant impact, particularly when California is facing worsening drought conditions.

The DEIR misses opportunities to minimize potable water demand by not assessing potential water reuse, particularly the extensive groundwater extraction that will be necessary for Project construction and operation.

Response to Comment No. 26-175

Contrary to the assertion made by this comment, the Draft EIR does not defer analysis of any electrical upgrades. The entirety of the discussion that the comment is referring to on page IV.M.3-12 of the Draft EIR states the following:

As discussed in the Utility Report, LADWP confirmed in its will-serve letter (included in Exhibit 5 of the Utility Report) that the Project's estimated electricity demand could be met by the existing electrical infrastructure in the Project area, including the existing underground conduits in Beverly Boulevard and Fairfax Avenue. Furthermore, the Project would include the installation of any necessary new lines, connections, and upgrades required by LADWP to ensure adequate service to the Project Site.

As summarized in this paragraph and in the Utility Report (Appendix O of the Draft EIR), LADWP has confirmed that the existing electrical infrastructure system can accommodate the Project. As such, off-site improvements are not expected. As is typical with new construction, the Project would need to provide new lines, connections, and upgrades on-site. These upgrades would occur as part of the construction activities that have been thoroughly evaluated in the Draft EIR. Specifically, the labor and construction equipment for these improvements are accounted for in the building foundation and building construction activities evaluated in the Draft EIR. Refer to Appendix FEIR-8 of this Final EIR for an overview of the construction assumptions for the Project, including the construction equipment mix and number of workers. Based on the Conceptual Site Plan, future off-site connections would be located a minimum of 75 feet from off-site sensitive receptors. Construction associated with the off-site utility connection would involve limited pieces of equipment (i.e., a concrete saw, a backhoe, and a dump truck) and would occur for a very short duration (i.e., a few days). Based on the calculations provided in Appendix FEIR-16 of this Final EIR, noise levels associated with the connections would be approximately 71.7 dBA (L_{eq}) at the nearest sensitive receptors along Fairfax Avenue (receptor R8) and Beverly Boulevard (receptor R3), which would be below the 5-dBA significance threshold (at receptors R8 and R3).

With regard to the service letters submitted to BOS, LADWP and SoCalGas, the information sent is consistent with Table II-2, Proposed Development Program, on page II-13 in Section II, Project Description, of the Draft EIR (i.e., the Conceptual Site Plan). Nonetheless, in response to this comment, these request letters are included as Appendix FEIR-8 of this Final EIR.

The commentor asserts that a PDF for water supply (Project Design Feature WAT-PDF-1) is a “disguised” mitigation measure. The provisions of this PDF are consistent with the water conservation measures included in the Water Conservation Commitment Letter the Applicant committed to implement as part of construction of the Project during the WSA process (see Appendix B of the WSA, which is included as Appendix N of the Draft EIR). Note that CEQA calls for the evaluation of the impacts of a proposed project as designed. Certain aspects of the design of the project may reduce the level of impacts. Those design features are permissible under CEQA so long as they are enforceable by the lead agency. The City of Los Angeles, when acting as the lead agency under CEQA, enforces PDFs through the Mitigation Monitoring Program, which is required under CEQA Guidelines Section 15126.4 and would be adopted by the City when it certifies the Final EIR. In the Mitigation Monitoring Program, both PDFs and mitigation measures will be identified, and for each PDF and mitigation measure, the following information will be provided—the enforcement agency, the monitoring agency, the monitoring phase, the monitoring frequency, and the action indicating compliance.

With regard to LID compliance and the implementation of BMPs, compliance with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No. 183833) and implementation of BMPs are required by law and, as such, are not mitigation measures. The assessment of potentially significant impacts and mitigation measures to reduce such impacts to a less-than-significant level occurs after consideration of regulatory compliance. With regard to the water demand calculations, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the water demand analysis was prepared based on detailed calculations from the WSA prepared by LADWP and adopted by its Board, included as Appendix N of the Draft EIR. The Project’s potential impacts on water supply are analyzed on pages IV.M.1-34 to IV.M.1-41 of the Draft EIR. As discussed in the Draft EIR and the Utility Report included as Appendix O to the Draft EIR, the analysis of existing conditions is based on LADWP billing records and the analysis of future conditions is based on the proposed floor area by land use in addition to other Project components such as basecamp, the Mobility Hub, and covered parking areas. Table IV.M.1-5 on page IV.M.1-35 of the Draft EIR shows the estimated water demand associated with the proposed development program detailed in Section II, Project Description, of the Draft EIR, while Table IV.M.1-6 on page IV.M.1-37 of the Draft EIR demonstrates a land use mix permitted under the Land Use Exchange Program that would generate the highest potential water demand for the Project (i.e., the maximum demand scenario). As shown therein, the Project could

generate an estimated maximum new domestic water demand of up to approximately 302,424 gpd, for a net increase of approximately 269,123 gpd over existing conditions, or approximately 301 acre feet per year (afy), including water savings from compliance with applicable regulatory requirements and additional water saving features as set forth in Project Design Feature WAT-PDF-1 on pages IV.M.1-30 to IV.M.1-31 of the Draft EIR. The 302,424-gpd calculation does not include the reduction associated with the existing uses to be removed or the Project's water conservation commitments that are set forth in the Draft EIR. Based on the projected water demand estimates for LADWP's service area from the 2020 UWMP identified in Table IV.M.1-4 on page IV.M.1-28 of the Draft EIR, the Project's estimated net operational domestic water demand of 269,123 gpd (301 afy) under the maximum demand scenario would represent approximately 0.047 percent, 0.045 percent, and 0.046 percent of LADWP's projected 2025 average, single-dry, and multi-dry year water demand and supply, respectively. Furthermore, as stated on page 21 of the WSA, LADWP concluded that the projected water supplies for average, single-dry, and multiple-dry years reported in LADWP's 2020 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and anticipated future water demands within LADWP's service area, through the year 2045. Accordingly, the Draft EIR correctly concluded that LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and, therefore, impacts on water supply would be less than significant. Also note that the WSA specifically addresses drought conditions and near-term drought risk management (refer to page 10 of the WSA and the discussion of drought conditions and plans to address such drought conditions throughout Appendix F of the WSA). In addition, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth by expanding local water supply programs and reducing demands on purchased imported water.

As discussed in Response to Comment Nos. 3-7, 26-112, and 26-115, groundwater extraction for the Project will be limited to temporary construction dewatering, with no ongoing permanent dewatering. Refer to the Dewatering Report included in Appendix FEIR-13 of this Final EIR, which includes a dewatering analysis that was prepared in response to comments for informational purposes and confirms the conclusion in the Draft EIR that impacts related to construction dewatering would be less than significant. The analysis also confirms that impacts related to subsidence from dewatering would be less than significant and would not damage neighboring properties; refer to Appendix D of the Dewatering Report included in Appendix FEIR-13 of this Final EIR.

The Project would implement regulatory infiltration control measures during temporary construction dewatering if necessary, and the underground structure would be designed such that no operational dewatering following construction is required. The

extracted groundwater will be discharged off-site via an approved NPDES permit or industrial sewer discharge permit. Neither of these discharge permits or other permits allow for the on-site reuse or re-injection of groundwater from temporary dewatering.

Comment No. 26-176

Cumulative Impacts

The DEIR analyzes a total of 68 related projects for its cumulative impacts analysis, based on a 2026 buildout year. However, the Project is requesting a potential buildout until 2043. Please explain how the DEIR failed to analyze impacts to the projected build out of 2043. Please provide evidence of what cumulative analysis was provided to assess cumulative impacts of buildout to 2043 on water supplies, wastewater capacity, and energy infrastructure. The DEIR needs to analyze reasonably foreseeable projects with a buildout to 2043. Please explain how the Development Agreement with a term to 2043 can be considered if the DEIR analysis does not extend to 2043?

Response to Comment No. 26-176

In accordance with CEQA Guidelines Section 15355, the cumulative analysis for each of the impact analyses within the Draft EIR is comprehensive and accounts for all reasonably foreseeable projects at the time the NOP was prepared for the Project, as well as future growth projections for each utility through 2043. In addition, Project impacts associated with long-term buildout through 2043 are specifically addressed in each of the impact analysis sections within Section IV of the Draft EIR. With regard to long-term impacts associated with water supplies and cumulative impacts, page IV.M.1-41 of the Draft EIR states:

LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Additionally, as stated in the WSA for the Project, a determination was made by LADWP that the demand associated with the Project is included in its 2020 UWMP, which shows that there is an adequate 20-year water supply. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

With regard to long-term impacts associated with wastewater, page IV.M.2-19 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR provides the following:

While future years could generate greater service area demands, LASAN would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. Additionally,

the One Water LA 2040 Plan—Wastewater Facilities Plan projects an available capacity of 92 mgd at the HWRP and 192 mgd in the broader Hyperion Sanitary Sewer System in 2040, which would provide more than sufficient capacity to accommodate the Project in the future.... As such, a later buildout date would not affect the impacts or significance conclusions presented above.

In addition, as set forth on page IV.M.2-20 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR:

...[N]ew development projects occurring in the Project Site vicinity would be required to coordinate with LASAN via a sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects located in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater anticipated to be generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements, similar to the Project. Furthermore, as with the Project, each of the 26 related projects in the LASAN service area would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. In addition, as with the Project, related projects would be required to implement construction management plans to ensure that adequate and safe access remains available during construction activities. Such construction management plans would also ensure that appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access and traffic flow is maintained on adjacent streets.

In summary, and as discussed in more detail in the Draft EIR, including compliance with regulatory requirements, cumulative wastewater infrastructure impacts associated with reasonably foreseeable future growth and related projects would be less than significant.

With regard to long-term impacts associated with energy infrastructure, page IV.M.314 of Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR provides the following:

While future years could generate greater service area demands, the existing electricity, natural gas, and telecommunications infrastructure systems in the surrounding area would continue to be expanded and improved in response to any increased demand, and the service providers for these utilities would continue to evaluate the need for infrastructure upgrades and expansion based on long-term growth and demand projections. As such, a later buildout date would not affect the impacts or significance conclusions presented above.

Furthermore, with regard to electricity, as set forth on page IV.M.3-16 of Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR:

LADWP would coordinate with the related projects to provide any necessary electrical infrastructure improvements specific to each development project. The related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. The related projects would be required to provide the necessary infrastructure and system improvements for their individual projects, thereby contributing to the electrical infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which LADWP determines whether sufficient infrastructure is in place to provide electricity to a proposed project. As part of the will-serve process, LADWP takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is available. As discussed above, the LADWP will-serve letter for the Project demonstrates that adequate electricity infrastructure is available to serve the Project.

In addition, with regard to natural gas, as set forth on page IV.M.3-17 of Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR:

SoCalGas would coordinate with the related projects to provide the necessary natural gas infrastructure improvements specific to each development project. The related projects would be reviewed by SoCalGas to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide the necessary infrastructure and system improvements for their individual projects, thereby contributing to the natural gas infrastructure in the service area. As discussed above, will-serve letters are provided for individual projects in which SoCalGas determines whether sufficient infrastructure is available to provide natural gas to a proposed project. As part of the will-serve process,

SoCalGas takes into account all uses (including future development projects) in the service area to ensure that sufficient local and regional infrastructure is adequate. As discussed above, the SoCalGas will-serve letter for the Project demonstrates that adequate natural gas infrastructure is available to serve the Project.

Based on the above and the more detailed analysis included in the Draft EIR, reasonably foreseeable cumulative impacts associated with water supply, wastewater, and energy infrastructure have been adequately addressed in the Draft EIR and such impacts were concluded to be less than significant.

Comment No. 26-177

III. OTHER CONSIDERATIONS

A. Growth Inducement

The Project will have growth inducing impacts that the DEIR has not addressed. Section 15126.2(d) of the CEQA Guidelines requires an EIR to “discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth...”

In general terms, a project may result in a significant growth inducing impact if it individually or cumulatively with other projects results in any of the actions described in the following examples:

- The project removes an obstacle to growth, such as: the establishment of an essential public service, the provision of new access to an area, or a change in zoning or general plan designation.
- The project results in economic expansion, population growth, or the construction of additional housing occurs in the surrounding environment in response to the project, either directly or indirectly.

While the Project will meet these criteria, including by changing the General Plan land use designation from “Community Commercial” to “Regional Center,” the DEIR includes a mere two pages of conclusory statements regarding the potential growth inducing impacts that will result from the Project.

Given the proposed General Plan amendment and adoption of the Specific Plan that will nearly triple the density on the Project Site, and increase the FAR, additional analysis of

growth inducing impacts was warranted. The DEIR needs to analyze the impacts of growth occasioned by the regionally significant project on the local community.

While the Project will both remove obstacles to growth and result in economic expansion, the DEIR spends a mere three pages addressing the potential environmental impacts that will result.

The Project will remove obstacles to growth in numerous ways. The DEIR concludes that “any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability.” (DEIR, p. IV-17.) Not only is there no substantial evidence supporting this conclusion, it is factually incorrect.

For example, the DEIR discusses the creation of a “Mobility Hub” which would bring new transportation options to the neighborhood. This “Mobility Hub” will expand the capacity of local infrastructure and remove constraints on development.

Similarly, the DEIR failed to analyze meaningfully the environmental effects of induced growth. The DEIR states that the Project would result in a net increase of approximately 5,702 jobs in the City. (DEIR, p. VI-15.) The DEIR oddly dismisses this as insignificant. Moreover, these employees will need to live somewhere, and because the Project is claiming no impacts on VMT, it should be assumed that these employees will need to live close to the Project Site, thus driving up demand in the City.

Response to Comment No. 26-177

The criteria listed by the commenter that may result in a significant growth inducing impact are discussed on page VI-14 of Section VI, Other CEQA Considerations, of the Draft EIR. Contrary to this comment, the analysis of growth-inducing impacts provided on pages VI-14 through VI-17 of the Draft EIR is thorough, complete, and fully complies with CEQA. Refer to Response to Comment Nos. 5-8 and 11-29 regarding how the proposed Regional Commercial designation would not increase the size of the Project allowed under the requested entitlements; rather, a site’s permitted FAR and height are controlled by its zone and height district designations. Currently, an FAR of 1.5:1 is permitted by existing zoning, and the Project is requesting an increase to 1.75:1 (a 0.25 increase in permitted FAR, which represents an approximately 17 percent increase over existing zoning). Also refer to Topical Response No. 7, Mobility Hub, regarding the function of the Mobility Hub, which would serve employees and visitors to the Project Site only. It would not be open to the general public without authorized access. Rather than creating “unplanned growth” as suggested by the comment, the Mobility Hub would reduce automobile trips and VMT. With regard to the net increase in employees on-site as a result of the Project, the Draft EIR did not “dismiss this as insignificant” as incorrectly stated by the commenter. Rather, the Draft EIR concluded that overall, the provision of new jobs would constitute a small

percentage of the City's anticipated employment growth and would not be considered "unplanned growth." Specifically, as discussed on page VI-15 of Section VI, Other CEQA Considerations, of the Draft EIR, the Project's net increase in employment would represent approximately 0.29 percent of the total number of employees in the City in 2026 and approximately 11.50 percent of the growth between 2021 and 2026. In the event of phased development of the Project, which could potentially extend to 2043, the Project's net increase in employment would represent approximately 0.27 percent of the total number of employees in the City in 2043 and approximately 2.61 percent of the total projected growth between 2021 and 2043.

With regard to housing for employees, as discussed on page VI-15 through page VI-16 of Section VI, Other CEQA Considerations, of the Draft EIR, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not; similarly, existing employees would not be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and it is anticipated that other employees would commute to the Project Site from other communities both in and outside of the City, as under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area as the Project does not propose the development of residential uses, and since many of the employment opportunities generated by the Project would be filled by people already residing in the Project vicinity or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

The transportation analysis in the Draft EIR used the VMT Calculator, as required by LADOT, to evaluate the potential change in VMT by the Project. The VMT Calculator is a tool based on the SCAG Regional Travel Demand Forecast Model, which takes into account demographic data (both residential and employment distribution) in the local area and throughout the region. Section A, Appropriateness of Using the VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, discusses the VMT generated by an infill development, such as the Project, in the existing urbanized and dense Central Area Planning Commission (Central APC) of the City of Los Angeles. The fact that the Project meets the work VMT per employee threshold goals of the Central APC is a strong indication that the Project moves jobs closer to housing, which is one of the key goals of the CEQA VMT evaluation criteria.

Overall, as discussed in more detail in the Draft EIR, the Project would not remove obstacles to growth, and the analysis presented throughout that document supports this conclusion. Furthermore, note that the CEQA Guidelines also state that it must not be

assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.⁷³

Comment No. 26-178

B. Alternatives

CEQA requires an EIR to include a discussion and evaluation of “a reasonable range of alternatives to the project, or to the location of the project, which would feasibly obtain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” (CEQA Guidelines §15126.6(a).) CEQA requires the lead agency to identify a range of feasible alternatives, including alternative sites, that could “substantially lessen any significant effects that the project would have on the environment,” and to discuss the comparative environmental effects of the project and the alternatives. (*Id.*, § 15021(a)(2); see *Mountain Lion Foundation v. Fish and Game Comm’n* (1997) 16 Cal.4th 105.)

Alternatives that may avoid or lessen the impacts of a project must be thoroughly analyzed, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (CEQA Guidelines § 15126.6(b).) These alternatives should not merely be variations on the design that the project proponent ultimately hopes to implement, but should be designed with the goal of avoiding or lessening the impacts of a project.

Further, “in order for the FEIR to be certified as in compliance with CEQA,” it must “identify a reasonable range of environmentally superior alternatives and to set forth facts and ‘meaningful analysis’ of these alternatives rather than ‘just the agency’s bare conclusions or opinions.’” In addition, the EIR should have identified any alternatives rejected as infeasible during the scoping process along with the reasons why those alternatives were found infeasible. The EIR was required to contain ‘detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully’ the alternatives to the proposed project.”

Finally, an EIR’s discussion of alternatives must be reasonable and supported by substantial evidence. (See, e.g., *Cleveland Natl. Forest Found v. San Diego Assn. of Govts.* (2014) 231 Cal.App.4th 1056, 1082-83.) “Argument, speculation, unsubstantiated opinion or narrative” do not constitute substantial evidence. (CEQA Guidelines § 15384(a).)

⁷³ CEQA Guidelines Section 15126.2(e).

The DEIR's alternative analysis is inadequate for several reasons. First, as noted previously, the DEIR fails to identify a number of significant impacts. Any analysis of alternatives is dependent first on a correct identification of impacts. In addition to the impacts the City identified in the DEIR, there may be significant impacts to transportation, greenhouse gas emissions, land use, energy, and cultural resources, at a minimum. The City needs to analyze a range of alternatives to reduce or avoid all the significant impacts ultimately identified in a revised and recirculated DEIR. Until the DEIR is revised and recirculated, it is impossible to accurately evaluate the alternatives.

Second, the alternative must be evaluated in the context of the most "basic objectives" of the project. The 12 Objectives provided for in DEIR are splattered from the most narrow to the most global. For example, the first Objective: "Create a fully integrated and cohesive master planned site regulated by a Specific Plan that retains the Project Site's land use as a studio facility...." Set aside the Specific Plan is non-existent, this objective is too specific to allow for a reasonable range of alternatives. How does one evaluate this objective without the Specific Plan? Even more specific and baseless is the Objective regarding the applicant's needed financial return: "Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant's fiduciary responsibilities and allow for sustained economic viability and growth in an evolving entertainment market, while generating tax and property revenues to the City." As this Objective is tied to the specific financial analysis done by the applicant for the development of this Project, won't all the alternatives fail to meet this objective.

And other Objectives as noted previously are almost impossible to decipher. For example, Objective 1 provides that the Project should be an "expandable, flexible and operationally seamless production ecosystem." How did the City evaluate the Alternatives with regard to this Objective and others? Did the City retain a technical expert to assist it with the evaluation of what is a "seamless production ecosystem"?

Response to Comment No. 26-178

Refer to Response to Comment Nos. 26-5 through 26-177. As demonstrated therein, the Draft EIR has been prepared in full compliance with CEQA and fully evaluates the potential environmental impacts of the Project. As such, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Regarding the range of impacts addressed in Section V, Alternatives, of the Draft EIR, the section addresses each of the impacts listed in the comment (transportation, greenhouse gas emissions, land use, energy, and cultural resources). See a summary of each topic in Table V-2 beginning on page V-16 of Section V, Alternatives, of the Draft EIR.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how CEQA does not require a draft Specific Plan be included in the Draft or Final EIR.

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of the Project objectives. As discussed therein, the Project objectives address a range of issues and are not impermissibly narrow. Furthermore, the Project objectives do not impede the development and evaluation of a reasonable range of alternatives in conformance with the requirements of CEQA. The objectives themselves, including the one cited by the commenter which is related to the studio's ability to respond to the future needs of the entertainment industry, also conform with the requirements of CEQA, and the commenter has provided no evidence to the contrary.

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding the economic objective.

Refer to Response to Comment Nos. 26-16 and 26-18 regarding the Project objective referenced in the last paragraph of this comment.

Comment No. 26-179

Third, and finally, the DEIR does not analyze an appropriate range of alternatives.

The DEIR rejected some of the most important alternatives without analyzing them, including an alternatives [sic] site. (DEIR, p. V-12.) The very purpose of CEQA is to identify alternatives that could reduce or avoid significant environmental impacts.

The applicant recently acquired the CBS Radford Studios in the Studio City area of the San Fernando Valley. Why is this not an alternative site for some of the same uses being proposed? Is the applicant proposing to add density in the future to the CBS Radford site? How much density? The DEIR Alternatives section should include an analysis of expanding the CBS Radford site. What other sites does the applicant own in the area? Culver City studios? Why was this not analyzed as an alternative for the Project?

Response to Comment No. 26-179

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the range of alternatives selected and why an alternative site alternative was deemed infeasible. As stated therein, pursuant to CEQA Guidelines Sections 15126.6(a) and (f), there are no requirements governing the nature or scope of the "reasonable range" of alternatives to be discussed, other than the "rule of reason." The range of alternatives

chosen was appropriately based on the significant impacts identified in the Draft EIR and public comments.

With respect to an alternative site, refer to pages V-11 and V-12 of Section V, Alternatives, of the Draft EIR, as well as Topical Response No. 16. Among other reasons, the objectives of the proposed Project are closely tied to the need to improve existing operations on the Project Site by creating a cohesive and integrated studio campus environment with new technologically advanced facilities.

Comment No. 26-180

Similarly the DEIR does not analyze a true reduced project alternative. Alternative 3—Reduced Density Alternative only reduces the project's proposed development program by 20%. Yet, the analysis shows that this alternative would not substantially reduce any of the Project's significant impacts and would itself have significant and unavoidable construction noise and air quality impacts. The DEIR states that it would not be "feasible" to assess an alternative that would avoid the construction impacts because doing so would require moving construction 700 feet to the west of the adjacent residential uses. However, if a true reduced density alternative were considered, it would reduce the development program by 50%, not merely 20%. With a reduced development program of 50%, it would be feasible to locate all of this new development more than 700 feet from the adjacent residential uses. Development could be focused along Fairfax Ave and to the west of the Primary Studio Complex. This is a feasible alternative, as defined by CEQA, that the City should have considered because it would have avoided one of the Project's two identified significant and unmitigated impacts. Please revise and recirculate the DEIR with this alternative analyzed.

Response to Comment No. 26-180

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of an alternative that would avoid the Project's significant onsite construction noise and vibration impacts. As noted by the commenter, this would require a 700-foot setback from the Shared Eastern Property Line, preventing development on over sixty percent of the Project Site (i.e., approximately 15.5 acres out of approximately 24.5 acres), in addition to the constraints associated with the HCM designation, which cover approximately 5.3 acres when including the Viewshed Restoration Area. A 50 percent reduced Project, as suggested by the commenter, would significantly hamper modern production operations, and impact the studio's financial viability. (Refer to Appendix FEIR-4, Economic Considerations). Both Alternatives 2 and 3 analyze significantly reduced density developments on the Project Site and as discussed in Section V, Alternatives, of the Draft EIR, these alternatives do not meet the underlying purpose of the Project or many of its

objectives, compared to the Project, and in the case of Alternative 2, do not meet many of the Project objectives.

Refer also to Response to Comment No. 26-179 regarding the range of alternatives chosen.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-181

Alternative 4—Mixed-Use Alternative appears to be a strawman. The scope of development is so much larger than the project, three million square feet in total, that it seems designed to fail. Since Alternative 4 actually increases impacts across numerous impact areas, it is entirely unclear why it was even included in the DEIR. Alternatives are supposed to be studied to avoid or reduce impacts. Alternative 4 does not do that. Alternative 4 increases the impacts. Therefore, it is not a reasonable alternative to have studied. A reasonable mixed-use alternative would have been one that included fewer residential uses in order to minimize construction noise and construction air quality impacts. Further, it is unclear why a 1,750 stall parking structure was included in Alternative 4 and why it was located immediately adjacent to the existing off-site residential and across from a City park. Again, it seems as if this was done to increase the alternative’s impacts. Alternative 4 should have created a buffer zone around the sensitive uses and not placed both a parking structure and six-story general office tower immediately adjacent to the existing off-site residential uses. Why couldn’t the office building be located on the western edge of the site as is the case for the Project? Alternative 4 is too big and was designed to fail as an alternative. Please revise and recirculate the DEIR with a mixed-use alternative that more appropriately sites new construction to address the Project’s identified impacts and reduces the amount of residential proposed so as not to create more impacts than the Project.

Response to Comment No. 26-181

Refer to Topical Response No. 16, Project Alternatives Analysis, and Response to Comment No. 26-179 regarding the range of alternatives chosen. With respect to Alternative 4 specifically, this alternative was chosen in response to multiple public comments received during the NOP comment period requesting the inclusion of housing in the Project. Alternative 4 also represents an alternate use to present a reasonable range of alternatives to the reader, and the evaluated FAR is consistent with the Project Site’s location in a Tier 3 Transit Oriented Community (TOC). An alternative which is superior to

a project in only some respects can satisfy the requirement of analysis of a reasonable range of alternatives. It should also be noted that Alternative 4 would reduce some of the less-than-significant-with-mitigation impacts associated with the Project, specifically archaeological resources, paleontological resources, and hazards and hazardous materials during construction. Thus, the alternative fulfills CEQA's goal of providing the public an opportunity to evaluate the comparative merits of alternative uses of the Project Site.

With respect to its development program, Alternative 4 was designed to locate all of the residential along the Fairfax Avenue frontage within a 30-story mixed-use structure with ground floor retail. A smaller office tower and parking structure would be located on the eastern portions of the Project Site. The location of the residential component along the Fairfax Avenue frontage preserves the HCM-required historic viewshed and allows for on-going operations of the existing HCM and studio uses to continue without interruption. The location along Fairfax Avenue also minimizes any potential site-wide security issues that might arise from the co-location of a residential project within a larger studio site. The design of the residential component of this Alternative is consistent with the goals of the Citywide Design Guidelines through the provision of a continuous street-wall and opportunities for retail, restaurant, and residential uses along Fairfax Avenue.

The design element for Alternative 4 is also consistent with the Mixed-Use Boulevard designation identified within the City's Framework Element. To complement this proposed location, the siting of the mixed-use residential component along Fairfax Avenue provides proximity to current bus stops serving the DASH Fairfax route, as well as the Metro 14, 214, 217, and 218 bus lines. The number of units chosen is consistent with City goals related to housing production. The provision of multi-modal transportation opportunities is also linked to Objective 3.13 of the Mixed-Use Boulevard in Chapter 3 in that it locates mixed-use where existing or planned major transit facilities are located. Additionally, the density associated with this Alternative is consistent with the TOC Tier 3 designation; however, please note that the Alternative does not maximize the density that would be permitted under TOC Tier 3 in order to be compatible with the density of the surrounding community. The office building is also located outside of the viewshed and in compliance with the HCM. This Alternative complies with the setbacks required under existing zoning and provides a greater than code required setback from its eastern property line. Alternative 4 also includes the same frontage areas, building stepbacks, general landscape plan, and streetscape improvements as the Project. Lastly, an aboveground parking structure would be located in the southeast corner of the Project Site, adjacent to (across an alley) from an existing parking garage.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-182

Where the DEIR [sic] does analyze an alternative, the analysis is unsupported. For example, the DEIR's analysis of Alternative 5 is plainly inadequate. Alternative 5 states that it would permit the same development program, but place the parking in above-grade structures instead of below ground.

The conceptual Site Plan for Alternative 5 is effectively the same as that of the Project (which the DEIR makes clear is only illustrative). It is not clear in the DEIR how the Project will eliminate multiple levels of below grade development yet not alter the above-grade development. How are the height limits going to be retained if the same square footage is being built above parking podiums? Are the Project heights already designed to have all parking above-grade? Is that why, for example, Height Zone B is 130 feet in height? If that's the case, were the related impacts adequately analyzed in the DEIR? Or will the Specific Plan include design and operational limitations on the above-grade parking?

The buildings in Alternative 5 are not shown as taller in the conceptual plan. How is this possible? What is the difference between the Project and Alternative 5? We note that page V 132 states that the above ground parking podiums "would increase building heights and density under this alternative." Is this correct? How will it increase the heights? How will it increase the density?

Further, what are the heights of the conceptual site plan presented in the Project? Do they differ from the maximum heights presented in the Height Zone map? Do they differ from the heights permitted in the Specific Plan that is not provided or are the height limits the same? If Alternative 5 has taller buildings, what are the Alternative 5 buildings and what are the heights of the Project's conceptual plan's buildings?

Response to Comment No. 26-182

This comment misrepresents the purpose of an alternatives analysis under CEQA. An alternatives analysis is, by its very nature, comparative, whereby the impacts of the alternative are compared to the impacts of the Project. The Project alternatives analysis was conducted consistent with the requirements of CEQA. Note that the level of detail required for the analysis of alternatives under CEQA is not as stringent as the level of detail required for the analysis of project impacts in an EIR. In accordance with CEQA Guidelines Section 15126.6(d), Section V, Alternatives, of the Draft EIR included "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," and Table V-2 on page V-16 provides a comparative summary of the environmental impacts under each alternative with the environmental impacts associated with the Project.

This comment also makes several incorrect claims about the Alternative 5 analysis, each of which is addressed further below.

First, the commenter makes several claims regarding building heights. As stated plainly on page V-127 of Section V, Alternatives, of the Draft EIR, the elimination of underground parking “would result in increased building heights compared to the Project.” Refer to page V-127 of the Draft EIR for the specific heights. With respect to the environmental impacts of building heights, as discussed on pages 31 and 32 of the Initial Study (Appendix A of the Draft EIR) and pages VI-20 and VI-21 of Section VI, Other CEQA Considerations, of the Draft EIR, pursuant to PRC Section 21099 (SB 743), the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts are not considered to be significant impacts on the environment and therefore do not require further evaluation under CEQA. The same is true for Alternative 5. With respect to the commenter’s question about the Project’s conceptual plan, heights for the Project are less than the maximum height limits in each height zone and also less than the heights in Alternative 5.

Comment No. 26-183

The Project proposes to put substantial amounts of production support and basecamps in below grade levels. Where will the production support and basecamp parking be located if the subterranean levels are eliminated? Will production support space go on the first floor of the parking structures? Where is basecamp going to be located? According to the Objectives, basecamp is essential to the efficient operation of a working studio lot. The Project proposes to also locate basecamp in the subterranean level and the parking structure. Where is the basecamp in Alternative 5 and how are the impacts different?

The construction air quality analysis summarily concludes that Alternative 5 would avoid the Project’s significant and unmitigated impacts from regional construction NOx emissions. There is no evidence provided to support this conclusion other than the statement that import/export of soils would be less than for the Project. Please provide the data showing that the regional NOx impacts would be less than significant.

While construction activities will be at similar distances, there will be more construction occurring above-grade. What are the impacts from this? There will be more above-grade construction and, therefore, there will be different emission sources. The DEIR summarily states that localized impacts would be less than significant with mitigation. Where is the data supporting this analysis? It needs to be provided in the DEIR for the public to review.

The conclusion regarding Toxic Air Contaminants is similarly truncated with no evidence. Where is the evidence showing that the equipment needed to build massive above-ground

parking structures will not have an impact greater than those associated with the excavation and export? Please provide this evidence and data.

The DEIR states that the energy usage is the same for above-grade parking and structures as it is for below grade structures without providing any data or analysis to support this conclusion. The data supporting this conclusion should be included in the DEIR.

The DEIR states that operational emissions and impacts will be the same for private vehicles as the project because the square footage is the same. But Alternative 5 places parking structures at and above grade with cars idling and emitting emissions closer to sensitive users. How will these garages be vented? Will they be naturally vented? If not, where will the mechanical exhaust be located? How much energy will the ventilation systems use? Was this factored into Alternative 5's emissions and air quality impacts and GHG impacts?

The DEIR states that Alternative 5 will have taller buildings. The cultural resource impacts from these taller buildings adjacent to the HCM are not analyzed. The DEIR only summarily states that the HCM would not be materially impaired. How is this determined? There is no analysis.

Similarly, there is no analysis regarding impacts to offsite HCMs like the Gilmore Adobe or Farmers Market or the historic district to the north. How will these taller buildings impact these resources? What are the impacts of these taller buildings on adjacent properties? The DEIR should include these analyses.

The DEIR's Energy analysis for Alternative 5 for the first time states that the garages will not require mechanical ventilation. Where is the analysis for the conclusion for the Project as well as the Alternative?

The Energy analysis also states that the project's construction would use less energy than the project because there would be less soil export/import. But what about the taller buildings? Will there be more energy required to build the podiums and then the structures on top? There is no analysis provided in the DEIR. The conclusion is provided without any evidence or analysis to support the conclusion. The energy consumption needs to be quantified.

Where are the solar panels to generate electricity going to be located for Alternative 5? Where are they located for the Project? If not incorporated into Alternative 5, then Alternative 5 will use more energy and likely more nonrenewable resources than the project. Is it feasible to generate two million kwh on an annual basis from solar panels on rooftops? Where is the analysis showing this? Please provide the analysis.

Currently solar panels cover almost the entire parking field and generate less electricity. How will solar panels on the rooftops generate more than the existing solar panels?

Alternative 5 would have taller buildings, but the DEIR concludes that the geologic (seismic) impacts would be the same. Where is the analysis to support this?

The GHG analysis for Alternative 5 has similar issues to the deficient air quality analysis. It states in a wholly conclusory manner that GHG emissions would be less. But what about the emission impacts from construction of the above-grade parking? What are those? How much more concrete may be used in their construction? What are the GHG emissions from the increased use of concrete?

Alternative 5 states that permanent dewatering would not be required. Given the relatively shallow level of groundwater onsite, where is the analysis that supports this claim? In addition, the Alternatives section includes for the first time an unsupported statement regarding Project dewatering. It states that subterranean parking would be designed to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with industry standards. The DEIR includes no information regarding how this will be implemented for the Project or alternatives. How will the methane mitigation systems work with such waterproof designs? What are the industry standards, especially in the high water table and artesian groundwater conditions at the Project Site? The DEIR, including the alternative analyses, completely ignores the potential impacts from permanent dewatering.

There is no analysis of runoff from open parking garages. Brake dust, leaking fluids, and other contaminants in parking garages have the potential to enter surface water from open garages during rain events and otherwise. There is no analysis of this impact from the open parking structures. This analysis needs to be completed.

There is no analysis of Alternative 5's land use impacts from the taller buildings. There is a lone statement stating that the taller building heights and increased density could be considered less compatible with the surrounding area. First, the DEIR needs to reach a conclusion and not be conditional. Are the taller heights less compatible with the surrounding area? Second, how do the above ground podiums comply with the City's policies against such structures? What is the land use impact from being inconsistent with the City's policies against above-ground parking structures? This analysis should have been completed. Similarly, there should have been an analysis of car lights shining into adjacent uses and what disruption the lights could cause to sleep patterns and enjoyment of use.

There is no analysis of the offsite noise from the above-grade parking structures. What noise levels will occur from tire screeching, engines revving, and other noises generally emanating from parking garages? Similarly, if basecamp and production support is now not going to be below ground, what will the increased noise levels from these activities be at the adjacent sensitive receptors? This analysis was not done and should have been completed.

The transportation analysis of Alternative 5 suggests for the first time that there may be various levels of the parking structures that include “production operations” levels that provide large basecamp areas. How were the impacts from the large basecamp areas accounted for in the overall analysis of Alternative 5? The trips, energy usage, water consumption, and air emissions were not assessed for this square footage. Please provide this analysis so the public can understand the impacts for Alternative 5. The DEIR needs to address the full scope of Alternative 5’s impacts, which includes impacts from these production operation levels and basecamp.

What would the noise impacts be of locating basecamp and other production operations on higher floors of the parking structures in Alternative 5? Similarly, what odors would be created by craft services serving the productions? This also was not analyzed. There is no analysis of impacts from having production on higher parking levels. And how have these square footages been included in Alternative 5 and the Project?

That production operations would be less efficient is not an environmental impact. It is unclear why this is relevant to the environmental impact analysis of Alternative 5. Alternatives are intended to assess ways in which a project’s significant and unmitigated impacts can be reduced or avoided. Suggesting that above-ground parking may be bad for business is not relevant to CEQA’s considerations in assessing an alternative.

Response to Comment No. 26-183

This comment makes several incorrect claims about the Alternative 5 analysis, each of which is addressed further below.

With respect to building heights as it pertains to historical resources, as stated on page V-132 of Section V, Alternatives, of the Draft EIR, the changes to the immediate surroundings have been altered such that they no longer contribute to the significance or integrity of historical resources. The alternatives analysis correctly concluded that impacts to historical resources would be less than significant.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR analyzed the proposed development program (i.e., the Conceptual Site Plan), and any substantial changes from which would be subject to further

discretionary City review and CEQA compliance review. The proposed Specific Plan would incorporate all of the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

Refer to page V-150 of Section V, Alternatives, of the Draft EIR regarding the location of basecamp areas and the effects of eliminating the below-grade areas under Alternative 5. With all parking under Alternative 5 located in aboveground parking structures, the design of these production related circulation areas would be compromised and need to be modified. In some locations, production staging and basecamp uses would need to be located on higher floors, which would disrupt production circulation and staging. Sound stages would need to be located at higher levels, which would create the need for truck ramps, service elevators, and additional layers of fire/life safety systems. This is accounted for in the analysis of Alternative 5 and the location of the basecamp would not affect trip generation, energy consumption (discussed further below), water consumption, or air quality (discussed further below) as suggested by the commenter.

Because no subterranean parking is proposed, basecamp operations under Alternative 5 would be aboveground and are analyzed as such throughout.

With respect to the air quality and GHG analyses, including TAC emissions, because no subterranean parking is proposed in Alternative 5, the import/export of soils would be reduced by approximately 78 percent compared to the Project. As an alternatives analysis is comparative, as explained above, this significant reduction in grading would result in a reduction of emissions from heavy construction equipment. A quantitative analysis is not required to make this determination. With that being said, the intensity of grading activities would be expected to be reduced proportionally with the amount of import/export. On pages 25 to 49 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the CalEEMod TVC Construction Output shows that the Project would result in approximately 185 pounds per day of NO_x from grading activities. A 78-percent reduction in the use of heavy-duty construction equipment and haul truck trips would result in approximately 41 pounds per day of NO_x. The overlap of demolition and grading activities would result in a total of approximately 60 pounds per day of NO_x, well below the SCAQMD regional threshold of 100 pounds per day of NO_x. All other construction activities were below the SCAQMD regional construction thresholds.

TAC emissions (primarily diesel exhaust particulate) would similarly be reduced with the reduction in the use of heavy-duty construction equipment and haul truck trips. As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational

activities. The quantitative HRA confirms the Draft EIR's conclusion that health risks from the Project, and likewise Alternative 5 (i.e., reduced TAC emissions associated with reduction in heavy-duty construction equipment and haul trucks trips during grading activities), would remain below applicable significance thresholds.

Regarding localized impacts, this comment acknowledges that construction activities under Alternative 5 would occur at similar distances as the Project. On pages 50 to 76 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the CalEEMod TVC Construction Output shows that grading activities would result in the maximum localized emissions associated with the Project. While grading activities under Alternative 5 would be substantially reduced, grading activities would still result in the maximum daily localized emissions during construction. Section 3.d, Analysis of Project Impacts, in Section IV.A, Air Quality, of the Draft EIR summarized the CalEEMod modeling and results were compared to SCAQMD Localized Significance Threshold (LST) guidelines. As shown in Table IV.A-12 (Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Mitigated) and Operations) of the Draft EIR, Project localized construction emissions would not exceed SCAQMD significance thresholds, resulting in a less-than-significant impact. Thus, no sensitive receptors would be impacted by increased air emissions due to the operation of the Project, and Alternative 5 would further reduce this less than significant localized impact.

As far as non-earthwork construction emissions are concerned, the overall amount of non-earthwork construction (building foundation, structure/enclosure, and architectural coating/finishing) would not change because that construction is now aboveground. Similarly, aside from grading equipment, the type of equipment used for aboveground construction is typically the same as below ground (e.g., concrete can only be poured for one floor at a time). Because the total amount of construction and equipment used would be the same, further analysis would yield the same results. As an example, Alternative 5 would include the same number of parking spaces and related parking square footage regardless of whether parking is above- or below-grade. Thus, the same amount of concrete would be used for either type of parking structure, and the alternative would result in the same amount of GHG emissions as the Project. With respect to operational vehicle emissions, these emissions are based on vehicle trips, not the location of parking. For the reasons stated above, the air quality and GHG analyses in Alternative 5 are adequate and comply with CEQA. The comment incorrectly claims operational energy demand would be the same as the Project. Energy demand associated with parking structures was calculated using CalEEMod 2020.4.0. As shown on page 36 in Appendix A (Calculation Details for CalEEMod) of the CalEEMod User's Guide (May 2021), unenclosed (aboveground) parking structures result in 1.75 kWh/sf associated with lighting. Enclosed (below grade) parking structures result in 1.75 kWh/sf associated with lighting and an additional 3.92 kWh/sf associated with mechanical ventilation-. Therefore, as stated on page V-134 of Section V, Alternatives, of the Draft EIR, Alternative 5 "would result in

slightly less operational energy demand associated with mechanical ventilation, which would not be required for the aboveground parking structures.” This reduction in energy demand would have a corresponding reduction in GHG emissions associated with Alternative 5. Please refer to Response to Comment No. 26-28 regarding parking structure exhaust (i.e., idling emissions) and potential localized impacts.

Similar to air quality and GHG, non-earthwork energy use during construction would be similar to the Project because the overall amount of non-earthwork construction would not change just because that construction is now aboveground and similar construction would be used.

The commenter incorrectly claims that there is no analysis regarding impacts to off-site historical resources. Refer to pages V-132 and V-133 of Section V, Alternatives, of the Draft EIR. Refer also to Response to Comment No. 26-45 above and Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources.

As stated on page V-136 of Section V, Alternatives, of the Draft EIR, consistent with Project Design Feature GHG-PDF-2, “Alternative 5 would be designed to meet LEED Gold or equivalent green building standards, and rooftop solar panels capable of generating 2,000,000 kilowatt-hours annually would be installed, similar to the Project.” PDFs would be enforced as a condition of approval for the Project or any adopted alternative. In other words, this level of solar production is a required element of both the Project and Alternative 5. The exact location of solar panels is not relevant to the alternatives analysis.

Impacts related to seismic hazards would be similar to the Project because, as stated on page V-135 of Section V, Alternatives, of the Draft EIR, like the Project, “Alternative 5 would be subject to all applicable regulations, including the applicable provisions in the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City’s General Plan Safety Element, and the Los Angeles Building Code.”

With respect to groundwater hydrology, as is the case with the Project’s subterranean parking, building foundations and footings under Alternative 5 would be designed such that they can withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. In addition, any such designs would be subject to compliance with all applicable laws and regulations, including, among others, the City’s LID ordinance, methane ordinance, and the California Building Code; the specific methods of code compliance for Alternative 5 are not relevant to the alternatives analysis. Please note that Project Design Feature GEO-PDF-1 included on pages IV.D-18 to IV.D-19 in Section IV.D, Geology and Soils, of the Draft EIR requires permanent Project structures to be designed for hydrostatic

pressure such that the temporary construction dewatering system will be terminated at the completion of construction. As with the Project, Alternative 5 would not require permanent dewatering.

With respect to methane, below-grade structures located within shallow groundwater levels will require an alternate methane mitigation system (MMS) design excluding subslab venting and mechanical extraction components, which would be impacted by the groundwater level. In lieu of subslab components, the impervious membrane would be overlaid by the parking structure mat slab designed with a minimum 1-percent slope toward the perimeter of the parking structure to promote methane migration from the subgrade along the below-grade walls. Additionally, the impervious membrane would consist of: (i) a dual-purpose waterproofing and methane barrier; or (ii) a waterproofing barrier and a methane barrier (two layers). The alternate MMS design would include gas detection and alarm systems and mechanical ventilation per the Methane Code. Approval of the proposed alternate MMS design would be subject to review and approval by LADBS. As such, with regulatory compliance, impacts would be less than significant.

Treatment of stormwater runoff is a matter of code compliance. Refer to pages V-140 and V-141 of Section V, Alternatives, of the Draft EIR for BMPs under Alternative 5. As stated therein, "Alternative 5 would implement BMPs for managing stormwater runoff in accordance with the City's LID Ordinance requirements." Because groundwater infiltration was deemed to be infeasible for the Project Site, it is expected that Alternative 5 would include the installation of a capture and use system similar to the Project. If capture and use is later determined to not be feasible, the Project would implement high efficiency biofiltration/bioretenion systems pursuant to LID requirements.

With respect to land use compatibility, the threshold under CEQA is whether or not a project would "cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." As stated on page V-143 of Section V, Alternatives, of the Draft EIR, based on approval of the requested land use entitlements, Alternative 5 would be consistent with the applicable goals, policies, and objectives in local and regional plans that were adopted to avoid or mitigate an environmental effect, including, but not limited to, the City's General Plan Framework Element, Wilshire Community Plan, LAMC, and SCAG's 2020–2045 RTP/SCS. Furthermore, as noted above, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts (including those associated with building height) are not considered to be significant impacts on the environment and, therefore, do not require further evaluation under CEQA.

Operational noise impacts associated with aboveground parking under Alternative 5 would not be substantially different than the Project. While all parking would be provided aboveground, parking garages are not substantial generators of noise, and their walls

provide noise barriers that reduce noise levels at surrounding properties. As analyzed in the Draft EIR (pages IV.I-46 and IV.I-48 in Section IV.I, Noise, of the Draft EIR), the Project noise analysis included aboveground parking facilities, including at grade parking areas and a multi-level aboveground parking structure located at the southeastern portion of the Project Site, nearest to the off-site noise sensitive receptor location R1 (i.e., the Broadcast Center Apartments). Noise levels associated with the parking facilities under Alternative 5 would be similar to the Project at the nearest off-site noise receptor location R1, as the aboveground parking structure along the eastern side of the Project would be similar under both the Project and Alternative 5. In addition, noise levels associated with the aboveground parking facilities along the western and northern perimeter of the Project Site under Alternative 5 would be similar to existing conditions, which also include open at grade/surface parking lots in the same locations, as there is no shielding provided with the open at grade parking lots under the existing condition. With respect to basecamp and support operations, in response to comments on the Draft EIR, an additional confirmatory noise analysis was performed to evaluate the noise impacts associated with the studio outdoor production activities (including basecamp and outdoor production activities), as discussed above in Response to Comment No. 26-146. The additional noise analysis assumed basecamp operations would occur at the perimeter of the Project Site to represent a conservative analysis. As analyzed therein, the estimated noise levels associated with future outdoor production and basecamp operations would result in a maximum noise increase of approximately 0.1 dBA, which is well below the perceptible level and the 5-dBA significance threshold, thereby confirming the Draft EIR's conclusion of less-than-significant impacts. As also described on page V-129 of the Draft EIR, the integration of basecamp, staging, and circulation areas for production vehicles with the new sound stages and production areas would be reduced under this alternative compared to the Project. Therefore, noise impacts associated with the basecamp operation under Alternative 5 would be similar or less as compared to the Project, which is less than significant.

With respect to odors associated with basecamp operations, the commenter's point is not clear. As stated on page 44 of the Initial Study, "according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding." Basecamp operations do not include any of these uses and the craft services mentioned by the commenter consist only of food and drinks provided for cast and crew members.

Lastly, the operational inefficiencies cited by the commenter are not included in the environmental analysis of Alternative 5. This is appropriately discussed in Subsection 4, Relationship of the Alternative to Project Objectives (commencing on page V-155), of Section V, Alternatives, of the Draft EIR.

Comment No. 26-E.1-1**Exhibit 1—Ramboll US Consulting letter**

Ramboll US Consulting (Ramboll) has reviewed the Draft Environmental Impact Report (DEIR) for the TVC 2050 Project on behalf of our client. Our findings reflect the conclusions reached given the time available for our review and information provided. To the extent that additional information or time is provided, our findings may change.

The TVC 2050 Project (Project) would establish a TVC 2050 Specific Plan to allow for continuation of an existing studio use and the modernization and expansion of media production facilities within the 25-acre project site.

Response to Comment No. 26-E.1-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.1-2**SUMMARY OF KEY FINDINGS**

Based on our review and analyses, the following key findings are noted:

Air Quality

- Comment 4. The proposed project did not conduct a detailed health risk assessment (HRA) to evaluate the potential health impacts (e.g., acute, chronic, and cancer risk) from construction or operational emissions and fails to provide evidence that its construction and operational TAC impacts would be less than significant. The project's construction and operations include sources of diesel particulate matter (DPM) and other TACs expected to be emitted in close proximity to existing residential land uses. Screening level analysis demonstrate that both construction and operational emissions may result in a significant health risk impact. Furthermore, the South Coast Air Quality Management District (SCAQMD) frequently requests projects to evaluate health risk impacts from construction and operations when they generate diesel emissions from long-term construction or attract diesel fuelled [sic] [sic] vehicular trips, especially heavy-duty diesel fuelled [sic] [sic] vehicles. Given the close proximity of sensitive receptors, the 20-year construction timeframe, and the numerous operational sources that will emit TACs, the DEIR should more thoroughly assess the health risk from both construction and operations. A screening analysis shows that the unmitigated construction impact may be significant, as

does a screening analysis of the operational generator emissions. This analysis should include all potential sources of construction and operational emissions and assess the impacts under a 20-year buildout scenario, as described in greater detail below.

- Comment 4 and 18. The proposed project contains a unique configuration of land uses in close proximity (<25 meters) to sensitive receptors and includes numerous internal roadways that could have over 1,000 peak one-way trips per hour including a number of trucks traveling on-site and loading areas on-site for the trucks traveling to the site. Furthermore, the building heights allowable under the proposed project's specific plan could impact peak pollutant concentrations for sensitive receptors adjacent to the project site. Traffic emissions in the wake of a development with a proposed height of 130–160 ft can result in an increase in annual concentrations of ~5% while peak concentration may increase by up to 15–20%. Given the proximity of the sensitive receptors, and potentially substantial mobile and diesel PM emissions in this location, the DEIR should evaluate the potential of these unique localized air quality impacts to ensure that the appropriate project design features or mitigation measures are implemented.

Response to Comment No. 26-E.1-2

As discussed on pages IV.A-68, IV.A-69, and IV.A-71 through IV.A-73 in Section IV.A, Air Quality, of the Draft EIR, Project construction would result in emissions below applicable localized impact thresholds, and the Project land uses would not constitute an operational land use identified by CARB or SCAQMD guidance which might be expected to result in substantial releases of TAC. As discussed therein, the SCAQMD CEQA Air Quality Handbook does not provide guidance requiring an HRA for short-term construction emissions associated with land use development projects.⁷⁴ Implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) would result in an approximately 90- to 95-percent reduction in DPM emissions in comparison to Tier 3 standards. Furthermore, as discussed in Response to Comment No. 1-2, Mitigation Measure AIR-MM-1 is being further strengthened to include CARB Tier 5 equipment where commercially available. DPM is typically the driving risk contributor for carcinogenic health risk from vehicle activities; thus, such reductions in DPM emissions would result in commensurate reductions to carcinogenic health risk. This supporting information is consistent with *L.A. CEQA Thresholds Guide* in making a case-by-case basis determination of significance. As such, the Draft EIR correctly concluded that Project-related TAC emission impacts during construction would be less than significant and, consequently, not result in a potential health risk impact. Refer to Response to Comment No. 1-3 for additional clarification regarding the qualitative analysis included in the Draft EIR.

⁷⁴ SCAQMD, CEQA Air Quality Handbook, Chapter 10, Assessing Toxic Air Pollutants, 1993.

While the Draft EIR correctly concluded impacts would be less than significant based on the qualitative health risk analysis, further evaluation of TAC emissions in response to SCAQMD's comments is included in this Final EIR to confirm the conclusions of the Draft EIR.

The quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes an assessment of health risk impacts from both Project-related construction and operational activities. The HRA implements the HRA protocol that was submitted to SCAQMD. SCAQMD subsequently responded that concerns regarding health risk impacts related to the Project have been addressed. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the points of maximum impact (PMIs), even after accounting for increased truck traffic associated with future operations, would be below SCAQMD's risk thresholds, further affirming the statements on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact. To be conservative, the HRA assumes outdoor exposure for the entire length of construction and operations and does not account for any reductions to TAC exposure from time spent indoors, where air quality tends to be better.

Page IV.A-74 in Section IV.A, Air Quality, of the Draft EIR acknowledges that construction activities could extend over 20 years. However, the overall amount of demolition, excavation/export, and square footage of building construction would not change due to a longer overall duration of construction activities. Thus, for the HRA, the 32-month, more intensive schedule was assumed, resulting in the greatest reasonably foreseeable Project-related TAC emissions occurring over the shortest anticipated construction period. This approach appropriately and conservatively accounts for the amplified exposure effects associated with childhood age sensitivities. Moreover, the 20-year buildout would benefit from future improvements in equipment efficiencies (more stringent regulatory requirements that would reduce future air emissions during Project construction), resulting in reduced TAC exposure relative to the 32-month buildout scenario. A comprehensive description of sources included in the HRA is included in the Health Risk Assessment Protocol, included as Appendix FEIR-10 of this Final EIR.

The commenter also suggests that Project-related truck traffic exhaust emissions could result in increased concentrations during future operations. While in large cities with multiple concurrent blocks of tall buildings (e.g., sky scrapers), "air canyon" effects can affect local meteorological conditions and pollutant dispersion, given the limited size of the Project Site and the low building heights of land uses surrounding the Project Site, "air canyon" effects would not be expected to occur. Moreover, as discussed above, the Project analysis has gone above and beyond what is necessary to confirm the less-than-significant health risk findings of the Draft EIR through the completion of an HRA. The Draft EIR air quality analysis and the HRA included as Appendix FEIR-10 of this Final EIR

were developed using reasonable assumptions based on the Project design and local meteorology. As stated in CEQA Guidelines Section 15204(a), “reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require the lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” The Draft EIR appropriately determined that the localized air quality and human health risk impacts would be less than significant based on appropriate qualitative and screening methods in consideration of the Conceptual Site Plan, and no further analysis is required. The Draft EIR’s and Final EIR’s HRA analyses account for the maximum potential Project impacts and provide “decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” (CEQA Guidelines Section 15151.)

Comment No. 26-E.1-3

Greenhouse Gases

- Comment 24. The proposed project allows for a long-term buildout scenario spanning 20 years, but the DEIR only assess GHG emission standards for the near term 3-year buildout scenario. For example, given that the Project may not be built out until 2043, the DEIR should evaluate how the project will align zero-emissions (ZE) or near-zero emission (NZE) on-road haul truck requirements established in CARB’s regulations, which will establish in NZE and ZE sales requirements in future years. Similarly, the proposed project includes buildings that utilize natural gas for heating (e.g., space and water heating) and cooking, which could conflict with the State’s SIP strategy and the 2022 AQMP for the South Coast Air Quality Management District (SCAQMD). Assembly Bill 1279, The California Climate Crisis Act, was enrolled on September 2, 2022. The bill requires California to achieve “net zero greenhouse gas emissions” as soon as possible, but no later than 2045—a mere 2 years after Project buildout—and to achieve and maintain net negative greenhouse gas emissions thereafter. It also requires that statewide anthropogenic GHG emissions are reduced to at least 85% below 1990 levels. Given the evolving legal environment and existing regulations that include GHG provisions pushing the State to net zero GHG emissions by 2045, the DEIR should evaluate its GHG emissions and energy usage under the long-term buildout by considering the GHG requirements that will be applicable in future years.

Response to Comment No. 26-E.1-3

The commenter recommends evaluation of potential GHG emission reductions related to future regulations regarding NZE and ZE trucks; however, the Draft EIR concluded that GHG impacts would be less than significant, and therefore mitigation is not required. With that being said, please see Response to Comment No. 26-39 for a

discussion of use of ZE and NZE heavy-duty construction trucks and Response to Comment No. 26-E.1-38 for a discussion of ZE and NZE operational trucks. Please refer to Response to Comment No. 9-24 and Appendix FEIR-8, Details of Project Buildout and Construction Activities, of this Final EIR for a detailed discussion of the long-term buildout scenario. Under the long-term buildout scenario, no increases in the total amount of soil hauled or the square footage of structures to be demolished would occur in comparison to the 32-month schedule. In addition, the total number of hours that equipment would need to operate remains the same in either scenario since the scope of work would not change. Moreover, the 20-year buildout would benefit from future improvements in equipment efficiencies (more stringent regulatory requirements that would reduce future GHG emissions during Project construction). Therefore, GHG emissions would be expected to be the same, if not lower, under the long-term buildout scenario than under the 32-month buildout scenario. Refer to pages IV.E-85 to IV.E-86 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR for the analysis of GHG impacts under the long-term buildout scenario.

Refer to Response to Comment No. 45-1 regarding the Project's compliance with the City's new all-electric buildings ordinance.

Comment No. 26-E.1-4

Noise

- Comment 28. The Project, as defined in the DEIR, is not a specific project, but rather a proposed 20-year development framework for future re-development. As such, the environmental analyses presented in the DEIR are based on a "hypothetical development mix" that is stated to "generate the maximum impact for that environmental issue". [sic] As related to noise impacts, the buildout scenarios are not defined or detailed and therefore the selection of the "maximum impact" scenario cannot be reviewed and confirmed. Additionally, because of the lack of project buildout detail, operational and construction noise impact determinations do not reflect the ultimate project buildout.

Response to Comment No. 26-E.1-4

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR, the Project Description complies with CEQA and discloses all of the physical aspects of the Project, and the level of detail is commensurate with the level of detail for a specific plan project.

As discussed in Response to Comment No. 26-138, construction of the Project over a 32-month construction period is the maximum noise impact scenario (i.e., the

development scenario under the proposed Specific Plan that would result in the greatest noise impacts) and this scenario was analyzed in the Draft EIR. Noise impacts under the long-term buildout scenario would be similar to or less than that of the anticipated 32-month buildout as the 32-month schedule provides for the peak construction equipment mix used at a given time along with overlap of construction phases.

As discussed in Section IV.I, Noise, of the Draft EIR and in Response to Comment No. 26-138, with the exception of potential mobile noise impacts, a later buildout date would not affect the impacts or significance conclusions, as such impacts are not dependent upon buildout year. With regard to Project-related mobile noise impacts, with an extended buildout year, the Future Without Project noise levels would increase as a result of ambient traffic growth occurring between 2026 and 2043. Thus, the Project's contribution to increases in ambient noise levels would be diluted, and overall Project operational impacts related to mobile noise would be expected to be slightly reduced. Also refer to Topical Response No. 1 and Response to Comment No. 5-5 regarding how the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. As discussed in Response to Comment No. 26-135, the Draft EIR noise analysis was based on the Conceptual Site Plan, and future changes that are substantially different than the Conceptual Site Plan, including a proposal that involves a land use exchange, or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. Also note that implementation of the limited Land Use Exchange Program would not affect the noise analysis as exchanges for additional sound stage or production support uses in exchange for reductions in the other permitted uses would not change the outdoor noise environment, nor would the peak day construction assumptions be affected.

Comment No. 26-E.1-5

- Comment 30. The existing ambient conditions have not been fully assessed. The ambient sound level survey methodology used, specifically the measurement durations, is not consistent with typical community noise survey durations as specified and recommended in industry standards for assessing community noise. As such, impact determinations are likely underestimated.
- Comment 29. An additional noise-sensitive receptor (Rancho La Brea Adobe residence) located south of the project site was not included in the survey or impact assessment.

Response to Comment No. 26-E.1-5

As discussed on pages IV.I-19 and IV.I-21 in Section IV.I, Noise, of the Draft EIR, the ambient noise measurements were conducted in accordance with LAMC Section 111.01, which requires ambient noise measurements to be conducted over a period of at least 15 minutes. The ambient noise levels at nine of the ten receptor locations were determined based on two 15-minute period measurements, one measurement during the daytime hours, between 7 A.M. to 10 P.M., and one measurement during the nighttime hours between, 10 P.M. to 7 A.M. In addition, a 24-hour ambient noise measurement was performed at receptor R1. Thus, the ambient noise measurement survey is consistent with CEQA and City requirements, as well as other environmental noise studies conducted for the City. Contrary to the commenter's inaccurate assertion, Project impacts were not underestimated.

Regarding the inclusion of the Gilmore Adobe in the impact analysis, refer to Response to Comment No. 26-139.

Comment No. 26-E.1-6**Hydrology and Water Quality Report**

- Comment 47. There are several inconsistencies observed in the DEIR for the stormwater runoff evaluation. For example, there are discrepancies in the total runoff volume estimates. Also, it's unclear if these values represent annual, monthly, or daily capture volumes and how these are related to the 50-year frequency design storm event runoff calculations.

Response to Comment No. 26-E.1-6

As discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR and shown in Table IV.G-1, Stormwater Runoff Summary, on page IV.G-36 of the Draft EIR, the 50-year frequency storm event peak flow rate within the existing Project Site is 53.53 cfs.⁷⁵ As discussed on page IV.G-36 of the Draft EIR, per the City of Los Angeles Bureau of Engineering Special Order No. 007-1299, the City has adopted the LACDPW Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires projects to have drainage facilities to meet the Urban Flood level of protection, which is defined as runoff from a 25-year frequency storm falling on a saturated watershed. The L.A. CEQA Thresholds Guide, however, establishes the 50-year frequency design storm

⁷⁵ Table IV.G-1 in Section IV.G, Hydrology and Water Quality, of the Draft EIR included a clerical error that has been corrected in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The existing and proposed flow rate is 53.53 cfs.

event as the threshold to evaluate potential impacts on surface water hydrology. Therefore, to provide a more conservative analysis of the ability of storm drain infrastructure to accommodate the demand generated by the Project, the higher 50-year storm event threshold was used. As shown in Table IV.G-1, runoff flows during Project operation would remain the same at 53.53 cfs during a 50-year storm event. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. The 50-year frequency design storm event flow rate pre- and post-Project (i.e., 53.53 cfs) is included in Table 2 within Section 6.2.1 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR.

As discussed in Response to Comment Nos. 3-4, 3-7, and 11-5, the Project would include the installation of a capture and reuse system to be used for irrigation purposes, consistent with the LID Ordinance. As stated in Section 5.2.2 of the Hydrology Report, the Project will capture and reuse up to approximately 625,000 gallons of water. Figure IV.G-1 of the Draft EIR and Figure 3 of the Hydrology and Water Quality Report demonstrate the proposed capture and reuse system for the capture volume to meet the LID 85th percentile design storm event. Figure IV.G-1 of the Draft EIR and Figure 3 of the Hydrology and Water Quality Report have been corrected to state that the capture volume is 625,000 gallons (refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR). This will provide ample capacity to capture the volume from the 85th percentile storm event in compliance with the LID Ordinance. This clarification does not change the impact analysis or significance conclusions in the Draft EIR because the Project will treat the required stormwater volume in compliance with the LID Ordinance.

Comment No. 26-E.1-7

- Comment 48. The DEIR recognizes the need for dewatering activities during project construction and mentions dewatering during operation. However, the report fails to describe the methodology/ quantitative analysis related to construction dewatering which is critical to demonstrate the basis for conclusions made about surface water and groundwater impacts and fails to include any analysis or conclusions for operation dewatering.

Response to Comment No. 26-E.1-7

As discussed in Response to Comment No. 3-7, the Project would include temporary construction dewatering and not permanent dewatering. For a detailed discussion of the Draft EIR's analysis of the Project's dewatering impacts, refer to Response to Comment Nos. 11-5 and 11-25.

As discussed in Addendum I, Response to Soils Report Review Letter (Appendix E.3 of the Draft EIR), the Project is currently in the pre-approval process, and the

dewatering system and methods will be determined during the City's building permit process.

As discussed in Response to Comment Nos. 26-53 and 26-58, during the design and construction phase, the specific temporary method of dewatering will be chosen after considering the following variables, among others: depth of intrusion required for each building foundation, the porosity and hydraulic conductivity of the soils in which the excavations occur, the potential to mobilize any existing groundwater contaminants, the potential for ground subsidence and/or liquefaction to occur, proximity to any existing production wells, and the volume of water to be dewatered on a daily basis. After evaluating each of these factors individually and collectively, a final excavation shoring methodology and dewatering strategy will be developed.

Nevertheless, a Dewatering Report was prepared in response to comments for informational purposes and confirms the conclusion in the Draft EIR that impacts related to construction dewatering would be less than significant; refer to Appendix FEIR-13 of this Final EIR. The analysis also confirms that impacts related to subsidence from dewatering would be less than significant and would not damage neighboring properties; refer to Appendix D of the Dewatering Report. The Dewatering Report relies upon published data and Project Site-specific conditions to estimate groundwater dewatering quantities and drawdown cones-of-depression. The analysis assumes that regulatory infiltration control measures will be implemented as needed. The analysis estimates a total of up to 26.4 million gallons (81 acre-feet) of groundwater may be pumped for the 21-month temporary dewatering period. For context, the local groundwater basin has a 200,000 acre-feet storage capacity and no other groundwater pumping is currently occurring within a one-mile radius of the Project Site.

Refer to Response to Comment Nos. 11-25 and 26-69 regarding the potential drawdown cone of depression dimensions.

The commenter's dewatering analysis overestimates the anticipated dewatering program, as it does not consider planned infiltration control measures, does not use a time-dependent analysis for the 21-month temporary dewatering period, and uses material properties that are not representative of the overall water bearing materials found at the Project Site.

Comment No. 26-E.1-8

- Comment 49. The evaluation of water supply assessment during project construction is missing in the DEIR. Also, the water supply during operations is assessed based on an optimistic future scenario presented in the Los Angeles Department of Water and Power (LADWP) 2020 Urban Water Management Plan

(UWMP). The UWMP assesses impacts for the next 25 years and is updated every five years. External studies indicate that this supply will be constrained in the future due to the concern of recurrent, cyclic droughts affecting the region. Project build-out is 2043 when the associated uncertainty is likely the greatest. The report should include additional discussion about anticipated climate impacts to make it clear these aspects have been considered when looking at future projections and contingency plans.

- Comment 50. The DEIR does not adequately substantiate the estimates of water savings as required by the City of Los Angeles ordinances. The report appears to be double-counting additional conservation savings of 4 AFY.

Response to Comment No. 26-E.1-8

Potential impacts related to water demand during construction are addressed on pages IV.M.1-34 to IV.M.1-36 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR. As discussed therein, based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd, which is considerably less than the amount LADWP analyzed in the WSA with regard to water demand during operation of the Project. As discussed below, LADWP has determined that the water demand associated with Project operations would be adequately accommodated by LADWP water supplies. Therefore, the Project's temporary and intermittent demand for water during construction could be similarly met by the City's available supplies during each year of Project construction. Thus, impacts would be less than significant.

The WSA, included as Appendix N of the Draft EIR, specifically addresses drought conditions and near-term drought risk management (refer to page 10 of the WSA, and the detailed discussion of drought conditions and plans to address such drought conditions throughout Appendix F of the WSA). In addition, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth by expanding local water supply programs and reducing demands on purchased imported water. As discussed on page IV.M.1-27 of the Draft EIR, LADWP's 2020 UWMP provides water demand and supply projections in five-year increments to 2045, based on projected population estimates provided by the SCAG in its 2020–2045 RTP/SCS. Table IV.M.1-4 on page IV.M.1-28 of the Draft EIR shows LADWP's water demand and supply projections from 2025 through 2045. As shown in Table IV.M.1-4, LADWP's water supply would be equal to the water demand within LADWP's service area during average, single-dry and multi-dry years from 2025 through at least 2045. LADWP's 2020 UWMP, therefore, concludes that adequate water supplies would be available to meet the projected demands within the LADWP service area under average,

single-dry, and multi-dry year conditions through 2045. Therefore, the City's water supply projections in LADWP's 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020–2045 RTP/SCS adopted by SCAG. As discussed on page IV.M.1-50 of the Draft EIR, the Project is compared to LADWP's projected 2025 water demand and supply because this is the closest of the 2020 UWMP's five-year projections to the Project's anticipated buildout year of 2026. However, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.

With regard to the assertion that water-conservation savings are double counted, the commenter provides no basis to demonstrate this claim. The water conservation savings within Table IV.M.1-5 of the Draft EIR and within the WSA that were calculated by LADWP account for both water savings associated with compliance with applicable City Ordinances and regulations regarding water conservation, including Ordinance No. 186488, Ordinance No. 184,248, the 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code, as well as additional conservation commitments made by the Applicant (Project Design Feature WAT-PDF-1). As shown in Tables IIA and IIB of the WSA, the water conservation associated with the commitments by the Applicant results in a water savings of approximately 4 afy.

Comment No. 26-E.1-9

Hazards

- Comment 52–59. The DEIR inadequately assesses or describes existing conditions and plans to monitor or mitigate conditions during construction and operation. Should evaluate the potential hazards associated with sensitive receptors.

Response to Comment No. 26-E.1-9

Refer to Response to Comment No. 26-78. As discussed therein, a detailed discussion of the existing conditions is included on pages IV.F-20 to IV.F-35 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. Refer to Response to Comment No. 26-86 for a discussion of the Draft EIR's analysis of potential impacts related to hazards and the mitigation measures proposed in response to impacts associated with hazardous waste generation, handling, and disposal during construction. The Soil Management Plan, which is included in Appendix G.1 of the Draft EIR, provides details on environmental monitoring, testing, handling, and proper disposal during excavation and construction.

Refer to Response to Comment Nos. 26-E.1-69 to 26-E.1-75, which discusses Comments 52 to 59 referenced in this comment.

Refer to Response to Comment No. 26-E.1-15 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant.

Comment No. 26-E.1-10

LAND USE

1. The DEIR relies on a proposed Specific Plan for the site in order to evaluate potential impacts related to consistency with plans and policies, notably the Los Angeles General Plan and City of LA zoning. The Specific Plan would govern future development in the TVC site and thus needs to reflect City of LA land use policies. The objective appears to be to give the site owner more flexibility in developing and modifying the site than the City planning process would normally allow. However, the Specific Plan is not included in the DEIR or described in any detail—it's essentially "to be determined" through a process that is not adequately disclosed to the public, as required by CEQA.

Response to Comment No. 26-E.1-10

Refer to Section IV.H, Land Use and Planning, of the Draft EIR for a thorough evaluation of the Project's consistency with the General Plan, LAMC and other applicable plans. Also refer to Response to Comment No. 26-22 regarding land use consistency. As demonstrated therein, the commenter is incorrect that the Draft EIR relied on the Specific Plan to evaluate land use consistency.

Refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the purpose of a specific plan and the proposed Specific Plan. As discussed therein, all of the physical aspects of the proposed Specific Plan are fully addressed in the Draft EIR, and the Specific Plan was not required to be included as part of the EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website.

Comment No. 26-E.1-11

2. The DEIR's support for its claim that the project would comply with the Open Space and Conservation Chapter of the General Plan is not adequate. Widening and landscaping existing sidewalks does not add true open space (i.e., public park or recreation area) or promote conservation. Accordingly, this impact determination does not appear to be based on substantial evidence specific to the issue being considered.

Response to Comment No. 26-E.1-11

This comment provides no substantial evidence to support the statement that the analysis of the Project's potential to conflict with the Open Space and Conservation Chapter of the General Plan is inadequate. As a non-residential project, the Project is not required to provide public open space. Nonetheless, an analysis of the applicable policies of the Open Space and Conservation Chapter is included on page IV.H-40 in Section IV.H, Land Use and Planning, and pages 9 and 10 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. As discussed therein, these applicable policies include Policy 6.3.3 that addresses utilization of development standards to keep spaces and facilities as safe as possible and Policy 6.4.8 regarding maximization of existing open space resources. As concluded in the Draft EIR, the Project would not conflict with these policies.

Many of the objectives and policies within the Open Space and Conservation Chapter are not applicable to the Project and, therefore, were appropriately not evaluated in the Draft EIR.

Comment No. 26-E.1-12

3. The DEIR's consideration of compliance with Citywide Design Guidelines, the GP Conservation Element/ Wilshire Community Plan, the LA Municipal Code, and elements of the Citywide Design Guidelines appear to rely on the proposed Specific Plan, which, as mentioned above, gives no details. Accordingly, there is no way for the public to verify the claimed compliance, and the impact determinations could be regarded as conclusory statements not based on substantial evidence.

Response to Comment No. 26-E.1-12

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3, the Draft EIR disclosed all of the physical elements of the proposed Specific Plan required by CEQA and comprehensively analyzed the Project's potential impacts in accordance with CEQA. As such, the analysis of the Project's potential to conflict with the elements of the Citywide Design Guidelines, General Plan Conservation Element, Wilshire Community Plan, and the LAMC is not conclusory as incorrectly asserted in this comment, and the Draft EIR correctly concluded that impacts related to the potential to conflict with land use plans and policies would be less than significant. Refer to Response to Comment No. 26-22 regarding the Project's consistency with applicable plans and policies.

Comment No. 26-E.1-13**AIR QUALITY**

4. The proposed project did not conduct a detailed health risk assessment (HRA) to evaluate the potential health impacts (e.g., acute, chronic, and cancer risk) from construction or operational emissions. The project's construction and operations include sources of diesel particulate matter (DPM) and other TACs expected to be emitted in close proximity to existing residential land uses. As shown in Figure IV.A-4, the closest sensitive receptors to the project site include the Broadcast Center Apartments adjacent to the project site on the east and the Rancho Brea Adobe located adjacent to the project site on the south. Additionally, the DEIR has not evaluated the following sensitive receptors that are in the vicinity of the Project site: the school located at 7659 Beverly Blvd, Los Angeles CA 90036, and the public park adjacent to the Project site. Given the large potential area with construction activity (25 acres), the close proximity to sensitive receptors (<25 meters), and the extensive length of construction (over 20 years), the emissions from construction could potentially have a significant health risk impact on the surrounding receptors. Furthermore, the South Coast Air Quality Management District (SCAQMD) frequently requests projects to evaluate health risk impacts from construction and operations^{1,2,3} when they generate diesel emissions from long-term construction or attract diesel fuelled [sic] vehicular trips during operation, especially heavy-duty diesel fuelled [sic] vehicles. In the case that a project is found to have a significant mobile source health risk, SCAQMD recommends strategies to reduce exposure that include enhanced building filtration systems with MERV 13 or MERV 15, building design and orientation, vegetation barriers, and landscape screening. The DEIR fails to provide evidence that its construction and operational TAC impacts would be less than significant.

- ¹ SCAQMD Comment Letter on Notice of Preparation of an Environmental Impact Report for the Blackhall Studios Project (Proposed Project). Available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/april/LAC220408-04.pdf?sfvrsn=8>. Accessed: August 2022.
- ² SCAQMD Comment Letter on Notice of Preparation of an Environmental Impact Report for the Panorama City Center (Proposed Project). Available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/june/LAC220602-02.pdf?sfvrsn=8>. Accessed: August 2022.
- ³ SCAQMD Comment Letter on Notice of Preparation of an Environmental Impact Report for West LA Commons (Proposed Project). Available at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/june/LAC220519-01.pdf?sfvrsn=8>. Accessed: August 2022.

Response to Comment No. 26-E.1-13

This comment is similar to a portion of Comment No. 26-E.1-2. Refer to Response to Comment No. 26-E.1-2. This comment also incorrectly states that impacts were not

evaluated at two sensitive receptors. First, contrary to the comment, the Morasha Hebrew Academy (7651 & 7659 Beverly Boulevard) was specifically identified in the Draft EIR as a sensitive receptor on page IV.A-29 and was analyzed in Section IV.A, Air Quality, of the Draft EIR. Second, Pan Pacific Park is not a sensitive receptor under the SCAQMD LST methodology properly employed in the air quality analysis in the Draft EIR. As discussed in Response to Comment No. 26-26, the SCAQMD in their LST methodology identifies sensitive receptors to be a receptor, such as residence, hospital, convalescent facility, where it is possible that an individual could remain for 24 hours. Thus, Pan Pacific Park would not be included as a sensitive receptor. As shown in Table IV.A-10 and Table IV.A-11 of the Draft EIR, Project localized construction and operational emissions would remain below the significance thresholds for receptors located within 25 meters of the Project Site. It should be noted that a 25-meter receptor distance is the closest receptor distance on the SCAQMD LST lookup tables and may be used to analyze receptors located closer than 25 meters. Thus, as the Project would result in a less-than-significant impact at the closest receptor distance, impacts to receptors farther away from the Project Site would similarly be less than significant.

The cited SCAQMD Notice of Preparation comment letters are simply a form letter provided by SCAQMD outlining their recommendation on the analysis of potential air quality impacts from proposed projects. The SCAQMD examples provided by the commenter do not show that a quantitative HRA is required to evaluate health risk impacts from construction and operations. As discussed in Response to Comment No. 26-E.1-2, the Draft EIR provided a qualitative evaluation of potential health risks related to the Project. While the Draft EIR correctly concluded impacts would be less than significant based on the qualitative health risk analysis, further evaluation of TAC emissions in response to SCAQMD's comments is included in this Final EIR to confirm the conclusions of the Draft EIR. As discussed in Response to Comment No. 26-E.1-2, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms that health risks from the Project would remain below the applicable significance thresholds. Thus, the SCAQMD strategies listed in this comment are not applicable.

Comment No. 26-E.1-14

- a. **On-Site Construction Equipment:** Using the CalEEMod-generated unmitigated emissions reported in DEIR Appendix B, Ramboll completed a Tier 3 health risk assessment (HRA) for on-site construction equipment using the United States Environment Protection Agency (USEPA) AERSCREEN tool. Results of this HRA indicate that the diesel particulate matter (DPM) from on-site construction equipment would generate a maximum incremental cancer risk of **52.9 in a million** at the fenceline and **65.2 in a million** at a distance of 175 meters from the project site (see **Attachment A**). This far exceeds the 10 in a million threshold. While the use of Tier 4 construction

equipment as required by Mitigation Measure AIR-MM-1 could reduce the health risk impacts of these equipment, the DEIR did not evaluate and disclose the unmitigated impacts, nor demonstrate if the mitigation measure would mitigate the significant impact.

- i. Additionally, as noted below in Comment 9 the DEIR has failed to model the construction emissions that may result from the extended 20-year buildout scenario. The DEIR needs to reasonably estimate what the level of construction activity may be over the course of the 20-year construction period to characterize potential construction emissions. While the DEIR's assumed shorter construction period may provide an estimate for the maximum daily emissions from construction activities, there is no indication that that approach reasonably estimates the total construction emissions over 20-years. [sic] The additional construction emissions over 20-years [sic] would result in additional exposure to DPM and other TACs and could result in higher cancer risk for sensitive receptors. Given the much longer potential construction period, this is another reason that the DEIR should evaluate the potential health risk impact from construction and operations of the Project.

Response to Comment No. 26-E.1-14

The Draft EIR correctly concluded impacts would be less than significant based on the qualitative health risk analysis, and the screening analysis discussed in this comment was not warranted based on the number of diesel trucks associated with the Project. Further evaluation of TAC emissions in response to SCAQMD's comments is included in this Final EIR based on a quantitative HRA to confirm the conclusions of the Draft EIR. The commenter did not account for implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) and would result in an approximately 95 percent reduction in DPM emissions in comparison to Tier 3 standards. The commenter cited the CalEEMod information from Appendix B of the Draft EIR, pages 315–324. The pages cited by the commenter included unmitigated and mitigated construction emissions. It is not clear why the commenter only included unmitigated health risk impacts. Updating Table A-1 (Maximum Individual Cancer Risk from Diesel Particulate Matter) from Attachment A of this comment letter using mitigated emissions instead of unmitigated emissions would result in the maximum cancer risk reduced from 65 in a million to 7.7 in a million (below the SCAQMD significance threshold of 10 in a million). Therefore, the commenter's screening level analysis further supports that the Draft EIR correctly concluded that Project-related TAC emission impacts during construction would be less than significant based on the qualitative health risk analysis and consequently not result in a potential health risk impact.

The commenter's health risk calculation also incorrectly relies on AERSCREEN, which is a "screening level" model. A screening level analysis may be appropriate to assess whether more detailed, refined modeling assessment is needed. Screening models typically rely on rough, very conservative assumptions to check if a project *could* cause a significant health impact. If, based on the screening, there is no potential for a significant impact, then no additional analysis is required. In this way, screening models may help save time and money by eliminating the need for some projects to complete more expensive, time-consuming dispersion modeling.

This use of screening models is consistent with industry standards and agency guidance. As recommended by OEHHA, page 4-25 of *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* states "Screening models are normally used when no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted."⁷⁶

As noted above, screening level results that show a potential significant impact are only relevant to the extent they demonstrate that additional analysis using a refined model should be conducted. Notwithstanding, the quantitative HRA prepared in response to comments, included as Appendix FEIR-10 of this Final EIR, analyzed health risks consistent with SCAQMD methodology and used AERMOD to complete refined dispersion modeling. AERMOD accounts for a variety of refined, site-specific conditions that facilitate a more accurate assessment of Project impacts compared to the less refined AERSCREEN screening model used in the commenter's comments. The most important differences between AERSCREEN and AERMOD are the following:

- **Meteorological Data**—The AERSCREEN model uses user-defined conditions, which incorrectly assume meteorological conditions occurring 24 hours per day, 365 days per year for the entire construction and operation duration along with the maximum daily emissions occurring each of those days. The HRA prepared in response to comments instead used AERMOD, which allows for SCAQMD representative meteorological data (Central Los Angeles) to be used in the calculation of annual concentrations. This SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five-year period (43,800 hours). With these conditions, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

⁷⁶ California Environmental Protection Agency, Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February 2015.

- **Site-Specific Conditions**—AERMOD allows for analysis of multiple volume sources, which is required to adequately represent Project construction and operation. The use of a single rectangular source with a release height of 5 meters to represent construction activities provided in the comment does not adequately represent the Project Site or account for complex terrain conditions and, as such, likely overstates emissions because of the plume interaction with terrain. In addition, a volume source and not an area source is the type of source recommended by the SCAQMD for modeling construction equipment and diesel truck exhaust emissions (SCAQMD LST Guidelines). By accounting for site-specific conditions around the Project Site, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

Consequently, the coarser AERSCREEN evaluation provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation. Potential health risk impacts from the Project to nearby sensitive uses as the result of proposed construction activities are more accurately identified by the AERMOD evaluation included in the HRA prepared in response to comments and included as Appendix FEIR-10 of this Final EIR. As shown in the HRA, pollutant concentrations are highest near the Project Site and dissipate with distance. As demonstrated in the analysis therein, the Project would not result in a significant health risk impact, and the HRA confirms the Draft EIR's conclusion of less-than-significant impacts. The HRA prepared in response to these comments demonstrates that health risks from the Project would be a maximum of approximately 7.5 in one million for residences east of the Project Site (Broadcast Center Apartments), which is below the applicable SCAQMD significance threshold of 10 in one million. Of note, the construction related impact was approximately 6.3 in one million and the operational incremental risk was approximately 1.2 in one million (difference between the buildout operational impact of 7.4 in one million and existing impact of 6.2 in one million). The increase in operational risk is primarily the result of conservatively locating proposed new emergency generators in close proximity to residents east of the Project Site, whereas existing emergency generators are spread throughout the Project Site (see Response to Comment No. 1-3).

This comment references a more specific comment by the commenter regarding construction emissions that may result under the 20-year buildout scenario; refer to Response to Comment No. 26-E.1-24. As discussed therein, spreading diesel exhaust (DPM) emissions over a longer duration would result in less intensive activities on an annual basis. Cancer risk calculations consider early life exposure (infant, child, adult) where younger individuals are more sensitive to pollutant exposure. Less intensive activities based on a 20-year buildout scenario would result in lower concentrations for early life exposure. As a result, cumulative cancer risk would be reduced in comparison to a more intensive 32-month construction schedule.

Comment No. 26-E.1-15

- b. **TAC Emissions from Soil Off-gassing and Tar Pits:** Appendix G of the DEIR indicates that elevated concentrations of gasoline range organics and arsenic were observed in the soil at the Project site. Additionally, the site is within the City of Los Angeles Methane Zone (PDF Page 20 of DEIR Appendix G) and is therefore impacted by naturally occurring methane and hydrogen sulfide. These TACs—gasoline range organics, arsenic, and hydrogen sulfide—all pose health risks. The DEIR should evaluate the health risk impacts associated with the potential release of these TAC emissions during project construction (particularly during soil excavation) and operation (from the tar collection system in the southwestern corner of the Project site and methane mitigation systems for buildings on the Project site).

Response to Comment No. 26-E.1-15

Health risks from toxic air contaminants (TACs) were comprehensively evaluated in Section IV.A, Air Quality, of the Draft EIR. As discussed on pages IV.A-68 to IV.A-69 of the Draft EIR, the greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, the health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 32 months (2.75 years), the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Furthermore, implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) would result in an approximately 95-percent reduction in diesel particulate matter emissions in comparison to Tier 3 standards. Additionally, the SCAQMD CEQA Air Quality Handbook does not provide guidance requiring an HRA for short-term construction emissions. Therefore, it is not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, Project-related TAC impacts during construction would be less than significant.

Potential TAC impacts during Project operation are discussed on pages IV.A-71 to IV.A-73 of the Draft EIR. As stated therein, when considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors in close proximity to land uses that emit TACs. CARB published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry

cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The primary sources of potential TACs associated with Project operations include diesel particulate matter from delivery and production trucks and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. SCAQMD recommends that HRAs be conducted for substantial individual sources of diesel particulate matter (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. The Project would not include these types of land uses and is not considered to be a substantial source of diesel particulate matter warranting an HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions. Furthermore, there are no substantial sources of TACs within the Project vicinity. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated onsite (e.g., cleaning solvents, paints, landscape pesticides, etc.) typical for the types of proposed land uses would be below the thresholds warranting further study under the California Accidental Release Program (CalARP). As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of offsite sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations, and potential TAC impacts would be less than significant.

Nevertheless, in response to comments and for informational purposes, a quantitative HRA was prepared, which confirms the less than significant conclusions in the Draft EIR; refer to Appendix FEIR-10 of this Final EIR.

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, 16-85, 26-38, 26-78, and 26-86 regarding the Draft EIR's discussion and analysis of potential soil and groundwater contamination and hazards under existing conditions and the proposed Project.

The Soil Management Plan, included in Appendix G.1 of the Draft EIR, addresses the management of soils with elevated levels of arsenic, among other contaminants of concern.

Refer to Response to Comment Nos. 13-6, 16-28, and 26-38 regarding potential methane impacts and the proposed Project's methane mitigation system.

The tar collection system currently operating at the Project Site does not result in any emissions. Refer to pages 32–33 of the Phase I ESA, included in Appendix G of the Draft EIR, as well as Response to Comment No. 13-4.

Comment No. 26-E.1-16

- c. **Operational Truck Trips:** Ramboll estimated the total truck trips (light-heavy duty trucks, medium-heavy duty, and heavy-heavy duty trucks) during Project operation as 559 one-way trips/day using the average daily trip and fleet mix data from the CalEEMod model output for the Project operation (PDF Pages 102 and 103 of DEIR Appendix B). This is almost three times more than the 100 truck trips/day threshold cited in the DEIR that would trigger the need for a mobile air toxics health risk assessment. Hence, the DEIR should evaluate the health risk impacts of the truck trips on the sensitive receptors that are located within the vicinity of the project site.

Response to Comment No. 26-E.1-16

This comment cites the CalEEMod Version 2020.4.0 analysis presented in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, which provides an estimated 11,346 weekday vehicle trips and assumes that the default CalEEMod fleet mix would be appropriate to evaluate localized impacts. This misconception is fundamentally flawed as the CalEEMod model is designed for calculation of regional emissions and not for the purpose the commenter is trying to use it for (developing a localized fleet mix). CalEEMod provides the fleet mix calculated using EMFAC based on the selected county. Specifically, EMFAC calculates the fleet mix by vehicle type based on the total trips and vehicle population data for the designated county. Thus, for Los Angeles County, CalEEMod would use the same default fleet mix for all land uses within the County regardless of land use type (i.e., CalEEMod uses the same fleet mix whether the user selects an industrial park, retail, or dwelling units). Furthermore, CalEEMod is designed to calculate regional emissions from a project based on regional data. It is fundamentally flawed to apply a regional fleet mix designed for all land uses within the region to represent a single project.

This Final EIR provides additional substantial evidence demonstrating that the Project would not constitute a land use that would result in substantial heavy-duty diesel trucks (i.e., the Project would result in less than 100 diesel trucks per day) based on siting criteria included in the CARB Handbook for evaluation of TAC emissions sources. Please refer to Response to Comment No. 1-4 for additional discussion of this siting criteria of TAC emissions sources. The diesel truck activity information from Gibson Transportation Consulting (GTC) is included as Appendix E of the HRA provided as Appendix FEIR-10 of this Final EIR. A summary of the information is provided below.

GTC prepared estimates of truck activity to and from the Project Site with completion of the Project. The estimates are based on counts of existing truck activity collected at the Project Site in year 2019. The counts identified “heavy” and “light” trucks, with the distinction being that heavy trucks had a trailer while light trucks were fixed frame, or “single-unit.” The existing site counts show an average of approximately 65 light truck trips per day (approximately 33 light trucks). There was an average of approximately 13 heavy truck trips per day (approximately 7 heavy trucks) and primarily operated during normal business hours.

The Project increases the size of the on-site development envelope and also increases the proportion of office space within the resulting land use mix. Therefore, the existing truck trips were used as a basis to estimate Project truck trips, accounting for the fact that the amount of sound stage and production support space (which generates the bulk of the truck activity) would be reduced proportionally due to the resulting land use mix. Buildout truck trips resulted in approximately 130 light truck trips per day (approximately 65 light trucks) and approximately 36 heavy truck trips per day (approximately 18 heavy trucks). When discounting the percentage of non-diesel trucks, which make up representative truck fleets (as calculated using the CARB Fleet Web Database), existing uses result in a total of 52 combined light/heavy diesel truck trips per day (a total of approximately 26 diesel trucks), and buildout uses result in a total of 114 combined light/heavy diesel truck trips per day (a total of approximately 57 diesel trucks). Thus, the Project would result in approximately 62 total net new diesel truck trips (approximately 31 total net new diesel trucks) and is substantially less than the 100 trucks criteria cited in the Draft EIR that would trigger the need for a mobile air toxics HRA (see page IV.A-72 of the Draft EIR). This information further supports that the Draft EIR correctly concluded that Project-related TAC emission impacts during operations would be less than significant and, consequently, not result in a potential health risk impact.

Comment No. 26-E.1-17

- d. **On-Site Trucks:** The DEIR does not appear to account for the air quality and GHG analyses emissions associated with the on-site trucks. As noted on PDF page 103 of Appendix M, there will be a number of trucks traveling on-

site and loading areas on-site for the trucks traveling to the site. Additionally, the health risk impacts from the on-site vehicle travel, including the diesel particulate matter that will result from on-site truck VMT and idling, must be assessed. Given the proximity to receptors and potential high volume of vehicle traffic the DEIR should evaluate localized impacts and the potential for health risk impacts from these sources of emissions.

Response to Comment No. 26-E.1-17

As discussed on page IV.A-41 in Section IV.A, Air Quality, of the Draft EIR, the Project's emissions were estimated using CalEEMod 2020.4.0 software, an emissions inventory software program recommended by SCAQMD. The CalEEMod 2020.4.0 software did not have the ability to calculate on-site vehicle travel exhaust emissions; accordingly, the CalEEMod 2020.4.0 calculations in the Draft EIR could not include such emissions. On-site vehicle travel exhaust is not considered a substantial source of emissions as travel and idle time would be limited in compliance with CARB-mandated ATCM limits. As further discussed on page IV.A-72 in Section IV.A, Air Quality, of the Draft EIR, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery and haul trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions and TAC emissions.

CalEEMod 2022 was released for full launch on December 21, 2022, after publication of the Draft EIR, and provides the ability to calculate on-site vehicle travel exhaust emissions including additional on-site travel and idle time associated with staging activities. Updated Project construction and operational emissions evaluated with CalEEMod 2022.1.1 are included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). As shown therein, the construction and operational emissions inventories include on-site vehicle emissions, and none of the significance conclusions regarding air quality impacts would change, which confirms the conclusions in the Draft EIR. Furthermore, these emissions are included in the HRA provided as Appendix FEIR-10 of this Final EIR. In addition, the Project would comply with the City's Ordinance No. 187714 (passed in December 2022), which requires all newly constructed buildings to be all electric.

Comment No. 26-E.1-18

- e. **Diesel Generators and Spray Booths:** Based on publicly available data from the SCAQMD's Facility Information Detail (FIND) database, Television City currently operates numerous sources of TAC emissions, including six diesel emergency generators, four spray booths, and six boilers.⁴ Annual TAC emissions from these sources as reported to SCAQMD in calendar year 2021 are shown in **Table 1** below. **Table 1** shows that DPM emissions from

existing operations (i.e., diesel generators) were greater than 39 pounds per year (lbs/yr) in 2021. SCAQMD's Risk Assessment Procedures (Permit Application Package "N") establish annual tier 1 screening emission levels for DPM, which range from 0.0483 lbs/yr for a 25-meter (m) receptor distance to 0.404 lbs/yr for a 100m receptor distance.⁵ According to SCAQMD's Risk Assessment Procedures, these "screening levels are pollutant emission thresholds which are not expected to produce a MICR greater than one in one million nor a hazard index greater than one."⁶ The current operational DPM emissions are nearly 100 times greater than the DPM screening emission level at 100m and 800 times greater than the screening emission level at 25 meters, indicating that the MICR from DPM emission due to the operation of the existing diesel generators is likely far greater than the 10 in a million threshold.

- ⁴ Data for TELEVISION CITY PRODUCTIONS, LLC, located at 7800 BEVERLY BLVD, LOS ANGELES, CA 90036, SCAQMD Facility ID 189282. Available at: <https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=189282>. Accessed: August 2022.
- ⁵ SCAQMD PERMIT APPLICATION PACKAGE "N" For Use in Conjunction with the RISK ASSESSMENT PROCEDURES for Rules 1401, 1401.1, and 212. Version 8.1. Available at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/attachmentn-v8-1.pdf?sfvrsn=4>. Accessed: August 2022.
- ⁶ SCAQMD RISK ASSESSMENT PROCEDURES for Rules 1401, 1401.1 and 212. Version 8.1. Available at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12>. Accessed: August 2022.

Response to Comment No. 26-E.1-18

Please refer to Response to Comment No. 1-3 for additional clarification regarding the qualitative health risk approach used in the Draft EIR for these sources. The commenter correctly identifies that the SCAQMD FIND database includes existing permitted sources on the Project Site. Specifically, the FIND database includes six emergency generators, four spray paint booths, and six natural gas fired boilers. The information provided in this comment (Table 1) regarding existing emissions is consistent with SCAQMD's FIND database and SCAQMD's Risk Assessment Procedures are noted for the record and will be forwarded to the decision makers for their review and consideration. However, it should be of note that the Tier 1 screening emission levels for DPM cited in this comment are for use on new sources under SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1, and 212 and not relevant to existing sources. Furthermore, a Tier 1 assessment involves a simple look-up table in which an exceedance simply means that an applicant would have to conduct a detailed risk analysis. In response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the less than significant conclusion in the Draft EIR.

As discussed on page IV.E-81 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would decommission five of the six existing emergency generators and replace them with new emergency generators on-site. Table IV.A-10 on page IV.A-70 in Section IV.A, Air Quality, of the Draft EIR showed that DPM from emergency generators would decrease under the Project. The emergency generator calculation sheet was inadvertently omitted from Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. This worksheet is included as Appendix D of the Health Risk Assessment provided as Appendix FEIR-10 of this Final EIR. As shown therein, existing DPM emissions were provided based on Television City's 2019 through 2021 Annual Emissions Reports (available on SCAQMD's FIND database as referenced in this comment) and reflect actual number of hours each of the six emergency generators were operated (approximately nine hours of runtime per existing emergency generator on an annual basis). Annual average DPM emissions from existing emergency generators results in 41.8 pounds per year averaged over the three-year period. DPM from existing emergency generators results in the vast majority of the existing health risk condition from the Project Site.

With the exception of one emergency generator (ID 618456 (i.e., Big Blue)), all existing emergency generators will be decommissioned and replaced with up to seven new emergency generators. Since the seven new generators could be located within 50 meters (approximately 170 feet) of residential uses, the Project will be required to comply with the new requirements in Table 1 of SCAQMD Rule 1470. A PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring new generators to meet the new emission standards included in Table 1 of SCAQMD Rule 1470 regardless of whether the generator is within 50 meters of sensitive land uses. While the emergency generators will likely be permitted for 200 hours per year consistent with SCAQMD Rule 1470, it is conservative to limit the usage in the analysis to historical annual hours of use since future emissions from new generators will substantially decrease in comparison to existing emergency generators (i.e., resultant DPM emission factors substantially decrease for future Rule 1470 compliant generators in comparison to existing older generators). Analysis of both existing and proposed generators at the maximum permitted hours (200 hours per year) rather than actual hours would overestimate the reduction in future incremental DPM emissions and reduce the Project's potential incremental health risk impacts for hours of generator usage that would typically not occur on an annual basis. The average DPM emission factor for the five existing emergency generators that will be decommissioned is 0.40 g/hphr and would decrease to 0.02 g/hp-hr for the new generators. The existing generators result in 41.8 lbs/yr of DPM based on historical annual hours of use or 837.5 lbs/yr at 200 hours. Under the Project, the seven new emergency generators combined with the Big Blue generator would result in 8.2 lbs/yr of DPM based on historical annual hours of use or 140.5 lbs/yr at 200 hours. The ratio of Project/existing generators based on historical hours is 5.1 and is 5.9 at 200 hours per year. Thus, the difference in Project versus existing emissions increases with increased use of the emergency

generators and it is more conservative to analyze generator usage based on historical annual hours of operation. Based on this information, potential TAC emissions from proposed emergency generators would substantially decrease in comparison to the existing emergency generators.

Footnote b in Table IV.A-7 on page IV.A-64 in Section IV.A, Air Quality, of the Draft EIR shows that existing paint spray booths (four permitted sources) will be removed as part of the Project. The emission inventory from these sources is also provided in Television City's AERs (available on SCAQMD's FIND database as referenced in this comment). The AER emission inventory data from the existing spray booths are included as Appendix F of the HRA provided as Appendix FEIR-10 of this Final EIR. As further discussed in footnote b of Table IV.A-7 on page IV.A-64 in Section IV.A, Air Quality, of the Draft EIR, given the nature and logistics of production activities in newer studio facilities and how spray paint booths are operated at Manhattan Beach Studios, an affiliate of the Applicant, spray paint booth usage is assumed not to increase as a result of the Project. Therefore, as stated in the Draft EIR, spray paint booth usage would not increase in comparison to existing conditions. Furthermore, any new spray paint booths at the Project Site would include the most up-to-date equipment, which would comply with applicable SCAQMD regulatory requirements (e.g., more efficient paint sprayers and HEPA filtration) and SCAQMD permit conditions. Based on this information, potential TAC emissions from proposed spray paint booths would not exceed existing emissions on the Project Site.

Natural gas usage (e.g., boilers) on the Project Site was calculated within CalEEMod and presented in Table IV.A-7 on page IV.A-64 in Section IV.A, Air Quality, of the Draft EIR. As shown therein, the Project would result in a minimal increase in natural gas emissions and resultant TACs. TAC emissions from natural gas are not a substantial contributor to health risk impacts in comparison to DPM. This is supported by SCAQMD's MATES-V study. As discussed on page IV.A-23 in Section IV.A, Air Quality, of the Draft EIR, the MATES-V study was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V study concluded that approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating). While the Draft EIR provided natural gas usage associated with the Project, the City of Los Angeles subsequently passed an all-electric buildings ordinance, which does not allow installation of new natural gas-powered equipment, with certain exceptions. The Project would comply with this ordinance.

While the Draft EIR correctly concluded impacts would be less than significant based on the qualitative health risk analysis, further evaluation of TAC emissions in response to comments is included in a quantitative HRA, provided as Appendix FEIR-10 of this Final EIR to confirm the conclusions of the Draft EIR.

Comment No. 26-E.1-19

On Page IV.A-72, the DEIR claims that the project would not contain substantial TAC sources and that it would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk (MICR) 10 in one million or an acute or chronic hazard index of 1.0. On Page IV.A-10, the DEIR states that sources of DPM during long-term operations may include heavy duty diesel-fuelled [sic] delivery trucks and stationary emergency generators, noting on Page IV.A-43 that stationary source emissions during operation are generated from proposed emergency generators during routine maintenance/testing. On Page IV.E-81, the DEIR states that the Project will replace five of the six existing emergency generators with new emergency generators on-site. Given that the proposed project therefore includes at least five emergency generators, the DEIR's claim that the project would not contain substantial TAC sources is unsupported. Because the DEIR fails to provide evidence to support its claims on page IV.A-73 that potential TAC impacts would be less than significant, the DEIR must perform an operational HRA to quantify health risk impacts from all operational emission sources expected as a part of the proposal project. Furthermore, if the proposed project expands operations relative to existing conditions or adds additional sources of TAC emissions, operational TAC emissions are likely to be greater than those reported in the 2021 AER.

Table 1. 2021 AER TAC Emissions for Television City Productions, LLC

Pollutant ID	Pollutant Description	Annual Emissions (lbs/yr)
106990	1,3-Butadiene	0.493
7664417	Ammonia	519.433
7440382	Arsenic	0.003
71432	Benzene	0.650
7440439	Cadmium	0.003
18540299	Chromium (VI)	0.000
9901	Diesel engine exhaust, particulate matter	39.024
50000	Formaldehyde	4.400
7439921	Lead (inorganic)	0.018
91203	Naphthalene	0.053
7440020	Nickel	0.008
1151	PAHs, total, with components not reported	0.084

Response to Comment No. 26-E.1-19

As discussed in Response to Comment No. 26-E.1-18, the Project would not create new substantial sources of TACs and would result in overall reductions to existing TAC emissions at the Project Site, and the Draft EIR correctly concluded that impacts would be less than significant based on the qualitative health risk analysis. However, in response to comments, further evaluation of TAC emissions is included in a quantitative HRA, provided as Appendix FEIR-10 of this Final EIR, which confirms the conclusions in the Draft EIR.

Comment No. 26-E.1-20

5. The air quality and health risk impacts of the truck activity in the truck staging areas (shown in Figures IV.I-4 and IV.I-5 of the DEIR) that will be used during project construction are not evaluated in the DEIR. As noted previously in Comment 4, the project is expected to generate over 100,000 truck trips during construction several of which would use these staging areas. Further, as shown in the attached Figures 2 and 3, there are numerous sensitive receptors including residences, schools, and a hospital that are located in the vicinity of these staging areas that would be exposed to criteria air pollutant and toxic air contaminant emissions including diesel particulate matter emissions from trucks that use these staging areas. Hence the project must assess and disclose these impacts in the DEIR.

Response to Comment No. 26-E.1-20

Refer to Response to Comment No. 26-24 regarding haul truck staging areas. As discussed therein, all haul truck staging would occur on-site per LADOT's approval letter dated June 30, 2022 (see the LADOT Haul Route Approval Letter included in Appendix M.5 of the Draft EIR). The two off-site staging locations described and evaluated in the Draft EIR are no longer proposed. Accordingly, there would be no off-site idling. As such, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. The removal of the staging locations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-E.1-21

6. The DEIR relies on the use of SCAQMD's Localized Significant Thresholds (LSTs) to evaluate the localized impacts of criteria air pollutants (NO_x, CO, PM₁₀, and PM_{2.5}) during construction and operation. There are several issues with the DEIR's use of SCAQMD's LSTs, as described in greater detail below.
 - a. First, the use of SCAQMD's LSTs likely underestimates potential construction and operational project impacts as there are receptors located less than 25

meters from the project boundary (Figure IV.A-4) and the minimum distance available in the SCAQMD's LST is 25 meters. Therefore, it may be inappropriate to use the SCAQMD's LSTs with a receptor distance of 25 meters. The use of the 25-meter look-up table does not address unique features of the Project, including siting two new private streets adjacent to the western and southern boundaries of the Broadcast Center Apartments. These six-lane and four-lane streets would support traffic adjacent to the windows and balconies of Broadcast Center residents. Moreover, the new private streets would essentially create "canyons" between the Broadcast Center Building and the new buildings at the edges of the Project Site. The TAC emissions from diesel-fueled trucks could linger in the "canyons" for longer periods, rather than more quickly dispersing. The DEIR does not address these unique and potentially harmful conditions created by the Project on nearby sensitive receptors. We request that the modeling be updated to address this unique conditions. The LST analysis was not designed to address these unique circumstances, thus the DEIR should consider running a project-specific analysis using a model such as the AERMOD dispersion model or a computational fluid dynamic model which can more accurately evaluate this unique situation, which could further evaluate how the concentration of pollutants is dispersed from these emissions sources to nearby sensitive receptors. These models can be used to more accurately represent the unique situation of this project through representation of the buildings that the LST analysis has not accounted for.

- b. Second, according to Tables IV.A-9, IV.A-10, IV.A-11, and IV.A-13 the DEIR references thresholds from Source Receptor Area (SRA) 2 for both NO_x and CO emissions,⁷ however, the project location falls within SCAQMD SRA 1⁸. Additionally, the analysis does not address the federal 2010 1-hour NO₂ standard.⁹ The DEIR must evaluate the potential impact relative to the federal 2010 1-hour NO₂ [sic] standard.
- c. Lastly, according to Tables IV.A-9, IV.A-11, and IV.A-13, the LST thresholds the construction emissions are compared against an assumed 5-acre site. However, if the project does in fact pursue a phased approach to construction as is outlined in Table IV.A-12 and IV.A-13, the area of land under construction at any given time may be much less than 5 acres. The LST thresholds for smaller land sizes are more stringent, and thus the DEIR analysis is not conservative, and the Project construction could exceed LST thresholds. Given that the Project may have construction areas much smaller than 5 acres, the DEIR must evaluate the potential impact for construction areas less than 5 acres, which could be evaluating LSTs based on the smaller LST area thresholds or through performing of air dispersion modelling.

- ⁷ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>
- ⁸ <https://data-scaqmdonline.opendata.arcgis.com/maps/814d6e7a791044dabcb3d0d4b8af4df9/explore?location=34.086950%2C-118.600650%2C10.48>
- ⁹ <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

Response to Comment No. 26-E.1-21

In part (a) of the comment, the commenter misconstrues the information provided in the SCAQMD's LST methodology for CEQA evaluations, suggesting that use of the analyzed 25-meter receptor distance may be inappropriate for projects with receptors within 25-meters of the site boundary and recommends the use of a computational fluid dynamic model instead. SCAQMD provides mass rate look-up tables with LSTs based on the distance between receptors and project site boundaries.⁷⁷ Page 3-3 of the SCAQMD LST methodology provides the following specific guidance: "The closest receptor distance on the mass rate LST look-up tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." The commenter's suggestion directly contradicts the SCAQMD LST methodology, which states that, for receptors closer than 25 meters to a project site, the 25-meter mass rate look-up table should be used. Table IV.A-10 in the Draft EIR demonstrates that incremental operational emissions would be below the respective SCAQMD LST emission limits. Table IV.A-11 in the Draft EIR demonstrates that incremental construction emissions with incorporation of mitigation measures would also be below the respective SCAQMD LST emission limits. See Response to Comment No. 26-E.1-2 for a discussion of why further investigation into speculative "air canyon" effects is not warranted. Nevertheless, since the publication of the Draft EIR, the City has adopted Ordinance 187714, requiring all newly constructed buildings to be all electric with certain exceptions, and new PDFs have been added, presented in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring the use of all electric off-road operational equipment (including landscaping equipment) and providing electrical tie-ins at basecamps to remove the need for portable generators. These changes would result in even lower on-site operational emissions than presented in the Draft EIR. Thus, the commenter does not provide substantial evidence that SCAQMD's LSTs likely underestimate potential construction and operational Project impacts.

As discussed on page IV.A-68 in Section IV.A, Air Quality, of the Draft EIR, the maximum on-site daily emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the area (SRA 1) based on

⁷⁷ Refer to www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds for more information.

a site acreage of five acres. Although the Project Site exceeds five acres and would have active construction and operational activities that exceed five acres, it was conservatively assumed that all on-site emissions would occur within a 5-acre area. This approach is recommended by SCAQMD for a screening-level analysis and conservatively over-predicts potential localized impacts, since more pollutant emissions would occur within a smaller area (i.e., more pollutant emissions per square meter) and in closer proximity to potential sensitive receptors.⁷⁸ In addition, the shortest receptor distance provided in the SCAQMD look-up tables is 25 meters (82 feet). The SCAQMD recommends that projects with boundaries closer than 25 meters to the nearest receptor use the LSTs for receptors located at 25 meters as explained above.⁷⁹

Potential impacts were evaluated at the closest off-site sensitive receptor, which is the residential use located directly east of the Project Site boundary. The 25-meter distance was conservative as the vast majority of construction and operational activities would be located farther away from the property boundary. Thus, the localized air pollutant impact analysis provided in the Draft EIR was conservative and conducted consistent with the SCAQMD LST methodology for CEQA evaluations.

Please note that the commenter's assertion that the Project would include new "private streets" is incorrect. Refer to Response to Comment No. 35-111.

Part (b) of this comment correctly identifies that Tables IV.A-9, IV.A-10, IV.A-11, and IV.A-13 in the Draft EIR reference thresholds from SRA 2 for both NO_x and CO emissions. While the Project Site is in close proximity to SRA 2, this was an inadvertent error and SCAQMD LSTs should have been provided for SRA 1. The updated LSTs for SRA 1 are included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Specifically, the LST for NO_x is reduced from 221 to 161 pounds per day and the CO LST increased from 1,531 to 1,861 pounds per day. While the LSTs for NO_x and CO are different, the significance conclusions provided in Tables IV.A-9, IV.A-10, IV.A-11, and IV.A-13 of Section IV.A, Air Quality, of the Draft EIR remain unchanged. Localized impacts remain less than significant.

The federal 1-hour NO₂ standard is evaluated over a 3-year average duration. As discussed on page IV.A-59 in Section IV.A, Air Quality, of the Draft EIR, construction impacts were evaluated over a 32-month duration. As such, the federal 2010 1-hour NO₂ standard was not applicable. In response to this comment, the equivalent federal 1-hour

⁷⁸ Ian MacMillan, SCAQMD CEQA Program Supervisor, Telephone Conversation, November 10, 2011.

⁷⁹ SCAQMD, Localized Significance Thresholds, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed November 7, 2023.

standard LST has been calculated based on the SCAQMD LST methodology. The calculated LST threshold for the federal 1-hour NO₂ standard is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As shown therein, the NO_x LST threshold would be reduced from 161 pounds per day to 119 pounds per day to account for the federal 1-hour NO₂ standard. The significance conclusions provided in Tables IV.A-9, IV.A-10, IV.A-11, and IV.A-13 of Section IV.A, Air Quality, of the Draft EIR remain unchanged when considering the calculated LST for the federal 1-hour NO₂ standard. Localized impacts remain less than significant.

Part (c) of this comment incorrectly assumes that the construction analysis under the long-term buildout scenario should have evaluated areas of land under construction of less than five acres. Please refer to Details of Project Buildout and Construction Activities included as Appendix FEIR-8 of this Final EIR for a detailed discussion of the long-term buildout scenario. As discussed therein, the Project would likely be developed according to the locations of proposed subterranean parking structures. It is impractical and inefficient to build subterranean parking structures in separate sections and similarly impractical to construct above-ground structures separately from the subterranean parking it sits on. Therefore, entire subterranean structures, as well as the surface development on top of those structures, would likely be built together, constituting a phase of construction. As shown in Figure 2 of Appendix FEIR-8, Details of Buildout and Construction, each of the defined areas of construction would be a minimum of approximately five acres. Thus, the Draft EIR correctly used the 5-acre SCAQMD LSTs.

Comment No. 26-E.1-22

7. On Page IV.A-53, the DEIR assumes VMT reduction features (e.g., TR-PDF-2) result in an approximately 37% reduction in overall VMT, citing RTP/SCS strategies as the basis of the reductions in the length and number of automobile trips. CARB's Draft 2022 Progress Report¹⁰ indicates that most trends (e.g., land use and housing trends, travel behavior, per capita VMT, etc.) "demonstrate limited progress in meeting the targets through 2019" and "many trends moved in the wrong direction, away from advancing climate goals and showing worsening inequality." The report concludes that "Californians are driving more... despite State planning statutes that encourage better transportation and planning decisions." The DEIR does not provide sufficient evidence that the VMT reduction features in TR-PDF-2 will achieve the stated VMT reductions and therefore may be overestimating the VMT reductions achievable in practice.

¹⁰ https://ww2.arb.ca.gov/sites/default/files/2022-06/2022_SB_150_Main_Report_Draft_1.pdf

Response to Comment No. 26-E.1-22

As discussed on page IV.A-44 of Section IV.A, Air Quality, of the Draft EIR, the Project-related VMT was calculated using the LADOT VMT Calculator. Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free-standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors, such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments. The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for the Project's VMT-reducing features, such as increased density and proximity to transit. As shown on page 374 of the Supplemental VMT Analysis provided in Appendix E to the Transportation Assessment (Appendix M.1 of the Draft EIR), MXD factors results in a reduction from approximately 126,364 daily VMT to approximately 97,076 daily VMT. The TDM measures described in Project Design Feature TR-PDF-2 would further reduce VMT to approximately 79,629 daily VMT (an approximately 18-percent reduction in Project VMT after accounting for MXD factors). The overall reduction in VMT accounting for both MXD factors and implementation of Project Design Feature TR-PDF-2 would result in an approximately 37 percent reduction in VMT.

The comment's claim that the Project's TDM Program "has been found inadequate" is unsupported by the information in the referenced document. In fact, the CARB 2022 Progress Report shows that GHG and VMT per capita have decreased by 4 percent in the SCAG region between 2005 and 2019 (Table 1, page 17). Given that this is the overall average throughout six counties, 191 cities, and over 38,000 square miles of land area, the vast majority of which is far less densely developed than the Project vicinity, has limited transit service, and has no dedicated TDM program of any kind, it is not at all indicative of the likely success or failure of the Project's TDM Program. The Project trip adjustments are based specifically on research on the effectiveness of various TDM measures, as discussed in detail in Attachment G to the TAG, and are, thus, supported by substantial evidence. Refer also to Topical Response No. 11, Transportation Demand Management, regarding the effectiveness of TDM measures.

Comment No. 26-E.1-23

8. The DEIR does not appear to properly account for visitor trips that will result from the construction of additional sound stages and a new Mobility Hub. As a result, the analysis may underestimate the daily trip rate, and therefore may

underestimate the Project's operational VMT and associated mobile source operational emissions.

- a. In Table IV.K-4, it is noted that the Project will have 350,000 square feet of sound stages. Existing sound stages at the Project site have audience capacities that range from 100 to 300 people,¹¹ indicating that there is significant visitor traffic from audience members to this land use. The new sound stages presumably will have similar or greater audience capacities, and thus will also have significant visitor trips associated with their operation. However, on Page IV.K-73 it is stated that the total daily vehicle trips were estimated using the total employees associated with non-retail and studio-related land uses. Thus, the DEIR does not seem to account for non-employee trips to these land uses, and thereby does not account for the VMT and associated air quality impacts of visitor trips resulting from audiences visiting the new sound stages.
- b. Per Page II-26, the new Mobility Hub is designed to “encourage employee and visitor use of public transit through the provision of a shuttle service” and would “provide an off-street space for Project employees and visitors to access passenger pick-up/drop-off zones, carpools, vanpools, shuttles, ride-share services, taxis, and other commercial and non-commercial vehicles, as well as the temporary parking of buses”.¹² However, as noted above, the DEIR only accounts for employee trips in its vehicular trip analysis. Thus, the DEIR also does not seem to account for visitor trips associated with the use of the Mobility Hub, which may include shuttles, buses, and other commercial and non-commercial vehicles with a greater emissions intensity than passenger vehicles.

¹¹ Television City Website: Stages. Available at: <https://televisioncityla.com/stages#>. Accessed: August 2022.

¹² TVC 2050 Project—Draft Environmental Impact Report—Project Description

Response to Comment No. 26-E.1-23

Contrary to this comment, the transportation analysis does not underestimate the daily trip rate for the Project and, therefore, does not underestimate the Project's operational VMT and associated mobile source operational emissions. Refer to Sections A, Empirical Data, and B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a discussion of the data upon which the Project trip generation rates were based and a detailed explanation of visitor trips.

In part (a) of the comment, reference is made to statements in Table IV.K-4 and on page IV.K-73 of Section IV.K, Transportation, of the Draft EIR to the effect that the sound

stage trip generation was based on the number of employees and, therefore, excluded visitor trips, such as audience trips. That conclusion is incorrect. Table IV.K-4 shows that the trip rates used for the sound stages are based on square footage and Footnote (c) of that table shows that the rates are based on empirical data from other studios in Southern California. As further discussed in Topical Response No. 10, NBC Universal operated studios with audience components when the empirical trip data was collected, and audience participation trips were explicitly incorporated into the NBC Universal Vision Plan Project Trip Generation Model. Thus, audience and visitor trips are accounted for in the base trip rates used to estimate the overall Project trip generation, including the growth in the number of sound stages and audience stages in the Project.

Part (b) of the comment discusses the trips associated with the Mobility Hub. As described on page IV.K-74 of Section IV.K, Transportation, of the Draft EIR, the Project's VMT analysis (and the operational traffic impact analysis) excludes (i.e., does not take credit for) most of the elements of the TDM Program and, therefore, represents a conservative (i.e., high) estimate of total Project trips. The Mobility Hub would be responsible for directly connecting the Project Site to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction, which is expected to increase the effectiveness and utilization of transit to/from the Project over and above what is included in the Draft EIR transportation analysis. Thus, rather than increasing the number of Project vehicle trips as suggested by the comment, the Mobility Hub would reduce the number of Project trips below what was analyzed in the Draft EIR. Refer to Topical Response No. 7, Mobility Hub, for more information.

Comment No. 26-E.1-24

9. The DEIR does not properly evaluate the emissions from construction under the extended 20-year buildout scenario. While Table IV.A-13 on Page IV.A-78 in the DEIR shows emission estimates for overlapping construction and operation, the CalEEMod model runs for construction do not appear to be performed properly to reasonably estimate the construction impacts at different years.
 - a. On Pages IV.A-74 and IV.A-75, the DEIR states that the Project Applicant is seeking a development agreement with a term of 20-years, and that as a result it is likely that construction would happen over this extended period of time concurrent with operation. As a result, the emissions for construction presented in Table IV.A-12 and Table IV.A-13 are assumed to be 50% of the maximum daily emissions that were found in each respective CalEEMod run. However, the assumption that 50% of the max daily emissions reported in CalEEMod would apply to each 5-year period is arbitrary and the DEIR does not provide sufficient evidence to justify this assumption. The DEIR needs to reasonably estimate what the level of construction activity may be over the

course of the 20-year construction period to accurately characterize potential construction emissions and associated air quality and health risk impacts.

Response to Comment No. 26-E.1-24

Please refer to Details of Project Buildout and Construction Activities included as Appendix FEIR-8 of this Final EIR for a detailed discussion of the long-term buildout scenario. As discussed therein, at most, there could be approximately four total phases of below-grade construction, any of which individually would be substantially less intensive (in terms of required construction equipment, haul/delivery truck trips, and construction employees, as discussed further below) than a single phase of construction. Under the long-term buildout scenario, no changes in the total amount of soil hauled or the square footage of structures to be demolished would occur in comparison to the 32-month schedule. In addition, the number of hours equipment would need to operate remains the same in either scenario since the scope of work would not change. Under the long-term buildout scenario, the amount of equipment operated on a day-to-day basis would be reduced due to the reduction in square footage of construction built at any one time. The same amount of gross building square footage would be built in either scenario. Therefore, the same amount of material needed to be constructed and delivered to the Project Site would remain the same. However, the number of daily deliveries would be substantially reduced as less work would be conducted each day.

Impacts associated with a long-term buildout were analyzed in Subsection 3.e in Section IV.A, Air Quality, and Appendix B of the Draft EIR. Construction activities were conservatively assumed to occur at approximately 50 percent of the maximum daily intensity that would occur during the 32-month single-phase construction duration (2023–2026), with the exception of mat pour activities, which were assumed to be the same as under the 32-month single-phase construction duration. Specifically, as stated in footnote 90 on page IV.A-75 in Section IV.A, Air Quality, of the Draft EIR, with a long-term buildout and operation of some facilities on-site while construction is occurring, only a single excavation operation could be accommodated on-site, thus reducing the excavation activities and associated haul truck trips by half. A single excavation operation would only result in half the number of pieces of equipment operated and result in approximately 300 daily haul truck trips instead of 600 trips. Other construction activities, such as building construction and finishing, would likely occur at a further-reduced level but were still assumed to occur at 50 percent of the maximum daily intensity. The construction assumptions used in the Draft EIR for the long-term buildout conservatively analyzed potential air quality impacts, and the analysis is supported by substantial evidence provided above and in the Draft EIR.

From a health risk perspective, since both the 32-month and long-term buildout schedules would involve equal overall construction activity and, therefore, comparable total

Project emissions (with the long-term buildout benefitting from emission reductions associated with future efficiency and emission control advancements), the 32-month, more intensive schedule would result in the greatest reasonably foreseeable Project-related TAC emissions occurring over the shortest anticipated construction period. Age-related risk sensitivities amplify the exposure effects of TAC for children of various ages. The higher, shorter-term exposure of the 32-month schedule appropriately and most conservatively accounts for the amplified exposure effects associated with childhood age sensitivities.

Comment No. 26-E.1-25

10. The DEIR does not provide complete technical documentation in the appendices for the air quality and GHG analyses, so it is not clear if the peak daily emissions are accurately represented in the DEIR. The missing files (e.g., CalEEMod run outputs) prevent the reviewer from verifying the technical analyses and results of the analysis.
 - a. On PDF Page 2 of DEIR Appendix B provides a table of contents for all CalEEMod Output files corresponding to the 2026 Buildout and Long-Term Buildout scenarios. However, the actual output reports provided are incomplete. First, the CalEEMod model run output for TVC Operations—Total Permitted Land Uses on PDF Page 264 of DEIR Appendix B seems to have several pages missing. Second, the table of contents lists two runs as ‘2043 Buildout’ runs. However, the corresponding runs in the output files have 2045, not 2043, as the operational year. Thirdly and most importantly, the summer output reports for the CalEEMod mode runs are not provided in Appendix B. SCAQMD Mass Daily Air Quality Significance Thresholds¹³ are for maximum daily emissions, which should be calculated as the maximum daily emissions across both summer and winter seasons. Since no documentation is provided for summer emissions in the Appendix, maximum daily emissions have not been adequately estimated.

¹³ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

Response to Comment No. 26-E.1-25

Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR provided the necessary CalEEMod output files for review of potential air quality impacts. The commenter incorrectly asserts that the CalEEMod output file for TVC Operations—Total Permitted Land Uses is missing pages. As this CalEEMod output file was only for operational emissions, Section 3.0, Construction Detail, was not necessary and would have been confusing and misleading to include in the appendix. Regarding the table of contents, there are two CalEEMod output files for Year 2043. The first CalEEMod output file is for

Existing (Buildout 2043) and provides the emissions inventory for existing uses in Year 2043. The second CalEEMod output file is for Project (Buildout 2043) and provides the emissions inventory for the Project in Year 2043. It is noted that the operational year for CalEEMod output files shows 2045. CalEEMod 2020 only provides the ability to analyze five-year increments beginning with Year 2035 (e.g., 2035, 2040, 2045, 2050, etc.). Project operational emissions are provided on page 24 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. As shown therein, there is no change in pollutant emissions between Year 2040 and Year 2045, with the exception of CO, which decreases from 142 to 141 pounds per day. Therefore, Year 2045 was correctly selected to represent Year 2043 operational emissions.

Regarding summer versus winter seasonal daily air pollutant emissions, it is important to note that CalEEMod emission calculations for on-site construction equipment (e.g., excavator) and operation sources (area, energy, and stationary [i.e., emergency generator]) are the same for both summer and winter. Project-related mobile source (construction and operational vehicular trips) summer emissions in comparison to winter emissions increase slightly for VOC and CO, decrease slightly for NO_x, and remain unchanged for PM₁₀ and PM_{2.5}.⁸⁰ Given that the Project results in regional construction and operational winter NO_x emissions that exceed the significance threshold and that mobile source NO_x emissions decrease for summer, winter emissions would represent worst-case daily emissions. Therefore, CalEEMod winter emission output files were provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR.

As discussed above in Response to Comment No. 26-E.1-17, CalEEMod 2022 was released for full launch on December 21, 2022. In response to public comments on the Draft EIR, Project construction and operational emissions were subsequently evaluated with CalEEMod 2022.1.1 and included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). As shown therein, Project-related construction and operational emissions calculated using CalEEMod 2022.1.1 in comparison to CalEEMod 2020.4.0 results in a reduction in CO, PM₁₀, and PM_{2.5} and similar VOC, SO_x, and NO_x emissions. The updated analysis confirms the Draft EIR's conclusions that both winter and summer operational daily pollutant emissions would be below the applicable significance thresholds.

⁸⁰ Season selection affects emission rates because seasonal fuel composition differences lead to a difference in fuel Reid Vapor Pressure (RVP), and RVP affects evaporative emissions. In addition, idle emissions rates also vary by season (CARB, EMFAC2021 Volume II-Handbook for Project-Level Analysis (page 6), 2021).

Comment No. 26-E.1-26

11. The proposed project includes buildings that utilize natural gas for heating (e.g., space and water heating) and cooking, which could conflict with the State's SIP strategy¹⁴ and the 2022 AQMP for the South Coast Air Quality Management District (SCAQMD)¹⁵. These strategies include control measures that require the use of zero emission space and water heaters in new residential and commercial buildings starting in 2030 (well before long term build out date of 2043). Additionally, per the State's SIP strategy, the use of these fuels in buildings (primarily natural gas) for space and water heating can "contribute significantly to building-related criteria pollutant and GHG emissions and provide an opportunity for substantial emissions reductions where zero-emission technology is available". [sic]

- a. For example, the State's SIP strategy includes a zero-emission standard for space and water heaters. Under this measure, CARB intends to develop a zero-emission standard using its regulatory authority for GHGs (which includes consideration of related criteria pollutant reduction benefits) for space and water heaters sold in California. This measure would go into effect in 2030 and require 100% of new space and water heaters (for either new construction or replacement of burned-out equipment in existing buildings) sold in California to meet the zero-emission standard.
- b. Similarly, the SCAQMD's 2022 AQMP includes several building control measures intended to reduce emissions from water heating, space heating, cooking, and other combustion sources in both residential and commercial applications. In general, these control measures include the proposed development of rules to require installation of zero emission equipment and appliances in both new and existing buildings.

¹⁴ https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

¹⁵ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/07-ch4.pdf?sfvrsn=6>

Response to Comment No. 26-E.1-26

As discussed above in Response to Comment No. 26-E.1-17, the Project would comply with the City's Ordinance No. 187714 (passed in December 2022), which requires all newly constructed buildings to be all electric and would be considered consistent with the SCAQMD 2022 AQMP and the State's SIP strategy as discussed in the comment. The inclusion of natural gas space and water heaters in the Draft EIR analysis constitutes a conservative assessment of local emissions. The modeling output files, included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see

Appendix FEIR-9 of this Final EIR), present an updated estimate of operational emissions incorporating building electrification using CalEEMod Version 2022.1.1. Minor differences to in-built model assumptions contribute to commensurately minor differences in the overall emission estimates. The updated analysis confirms the Draft EIR's conclusions that daily pollutant emissions would be below the applicable significance thresholds.

Comment No. 26-E.1-27

12. The DEIR does not adequately evaluate the potential land uses allowable under the proposed project. On page 17 of Chapter D.II Project Description, the Project's Specific Plan is described as having flexible land uses. In addition to the permitted land uses of production-related and ancillary uses, the Specific Plan also does not explicitly prohibit related uses and facilities including: basecamps, communication facilities, conference facilities, modular offices and trailers, studio support facilities, parking, various ancillary commercial and retail uses, catering facilities, special events, audience and entertainment shows, museum exhibits and theatres, childcare and educational facilities, fitness facilities, emergency medical facilities, fuelling [sic] stations and vehicle repair, maintenance and storage facilities, mills/manufacturing, sleeping quarters for on-site personnel, restaurants and special event areas, security facilities, signs, storage and warehouses, and helipads. This is an extensive list of land uses, most of which are not analysed [sic] in the Project's CalEEMod runs, which only include the following land uses: production offices, sound stages, retail centres, [sic] and a restaurant. Several of the related land uses listed in Chapter D.II (including childcare and educational facilities, medical facilities, warehouses, and museum exhibits and theatres) would have different associated energy and water demands than the land uses currently analysed [sic] by the Project. As a result, the Project's estimated air quality and greenhouse gas emissions would not be accurate if any of these other land uses were constructed. Additionally, if other related land uses that are not directly ancillary to the production work are constructed, the Project's VMT analysis (Appendix M) would also be inadequate, since it only estimates the traffic generated by employees traveling to the Project Site for production-related work.

Response to Comment No. 26-E.1-27

As discussed in Topical Response No. 3, Permitted On-Site Uses, the proposed Specific Plan would allow five land uses (in addition to the ancillary sitewide uses that support the studio and the five land uses): sound stage, production support, production office, general office, and retail. Of the five land uses, only general office and restaurant uses have direct corresponding land use categories within the CalEEMod or LADOT VMT models. Therefore, it was necessary to utilize representative land uses within these models. Because representative uses are not exact representations of the Project's studio

land uses, representative uses which would result in a conservative estimate of operational water, energy, and VMT were selected. Refer to the Energy Consumption Memorandum by AMA Group included as Appendix C-4 in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR), which discusses and validates the CalEEMod land use assumptions in the Draft EIR.

General office and production office uses were represented by the General Office Building land use within CalEEMod. The CalEEMod strip mall land use type was used to represent retail uses and the CalEEMod high-turnover (sit-down) restaurant land use type was used to represent proposed restaurant uses. While CalEEMod provides 79 different land use types, some of the studio-related land uses that are proposed as part of the Project are not specifically included in CalEEMod. Therefore, sound stages and production support were represented by the land use types within CalEEMod that are most reflective of the types of operations which would occur on these portions of the Project facility. As an example, the CalEEMod strip mall land use type (electricity usage rate of 13.07 kWh/sf/yr) was selected to represent production support. Production support includes a wide variety of studio-related uses. To provide perspective, CalEEMod provides an electricity usage rate of 10.86 kW/sf/yr for general light industry uses and 12.5 kW/sf/yr for medical office buildings. As such, use of the CalEEMod strip mall land use type for production support uses is conservative and likely overstates utility usage. An electricity usage rate for the proposed sound stages was developed based on 2017–2018 utility bills from Manhattan Beach Studios (MBS) in which electricity bills were separately available for each sound stage. To develop a future stage kW/sf/yr rate that would reflect a more modern-energy efficient use, the total annual electricity usage for the MBS stages was divided by the total square footage of the sound stages, resulting in a rate of 11.34 kWh/sf/yr. Natural gas meters at MBS were not directly metered for each individual sound stage, and, therefore, the same calculation method was not available. Instead, the Draft EIR used the CalEEMod land use type of industrial park to represent the proposed sound stages.

The Land Use Exchange Program in the proposed Specific Plan would allow limited exchanges between certain land uses. The Land Use Exchange Program allows for limited increases in the size of sound stage and production support uses in exchange for equivalent decreases in the size of other uses but does not allow any increase in the square footage of production office, general office, or retail uses. Thus, a land use exchange to increase sound stage or production support would be reflected by increasing the modeled Industrial Park land use square footage and reducing the modeled General Office Building land use square footage. Please refer to pages IV.A-64 and IV.A-70 through IV.A-71 in Section IV.A, Air Quality, of the Draft EIR for the analysis of air quality impacts associated with the land use exchange scenarios.

Tables 8.1 and 9.1 in Appendix D of the CalEEMod 2020.4 User Guide present the energy and water use characteristics of these land uses and show that the General Office

Building land use subtype in the CalEEMod model results in greater (i.e., more conservative) energy and water demands than the Industrial Park land use subtype. Thus, the Draft EIR's analysis, which conservatively modeled the maximum allowable General Office Building, most conservatively estimates electrical and water needs of the Project facility even after accounting for potential land use exchanges. Similarly, as presented in Table 1 of the City of Los Angeles VMT Calculator Documentation, the General Office Building land use would result in greater VMT than the LADOT VMT model's representative Light Industrial land use, which also represents a conservative assessment of Project emissions. Therefore, contrary to the commenter's assertion, the Draft EIR's analysis of energy, water use, and VMT appropriately reflects a conservative assessment of Project operations.

Comment No. 26-E.1-28

- c. [sic] As noted in Pages II-1 (footnote 1) and II-13 (footnote a of Table II-2) of the DEIR, the Project uses a definition of square footage based on the TVC 2050 Specific Plan rather than the Los Angeles Municipal Code (LAMC) definition of floor area. This difference leads to an underestimation in the floor area of the project used in the CalEEMod analysis. The TVC 2050 Specific Plan square footage fails to include numerous land uses that would be captured as floor area under the LAMC definition of floor area, which leads to square footage of floor area potentially unaccounted for in the DEIR's air quality and GHG emissions analysis. Examples of these uses include the Mobility Hub, production trailers, basecamp areas, and the parking areas with associated driveways and ramps. A meaningful analysis should include all areas and uses that would generate pollutant emissions and thereby impact air quality.
- d. [sic] Additionally, it is not clear which definition of floor area was used to estimate the square footage of the existing land uses. If the CalEEMod runs for the existing conditions utilized the LAMC-defined floor area, the square footage of existing conditions could be overestimated. In turn, this could lead to an underestimation of the project emissions, which are estimated based on the incremental emissions between existing conditions and project buildout.

Response to Comment No. 26-E.1-28

As shown on pdf pages 25, 50, 98, 108, 118, 128, 153, 177, 202, 265, 275, 285, and 295 of Appendix B of the Draft EIR, and discussed in Response to Comment No. 26-E.1-27 above, a variety of land use categories available in the CalEEMod model were utilized to develop representative emissions for Project operations. Both the future Project operations and existing conditions were modeled utilizing consistent definitions of square footage and represent an apples-to-apples comparison of Project emissions. Refer to Topical

Response No. 2, Definition of Floor Area is Appropriate. As discussed therein, the additional square footage is related to the Mobility Hub; basecamp uses; outdoor eating areas (covered or uncovered); trellis and shade structures; covered walkways and circulation areas (including the existing marquee structure); and all temporary uses, including sets/facades, etc.

As shown on pdf page 98 (CalEEMod Output—TVC Operations—Total Permitted Land Uses) of Appendix B, Air Quality and Greenhouse Emissions, of the Draft EIR, Project-related operational emissions included approximately 2,600 parking spaces within enclosed parking (default of 1,040,000 square feet) and approximately 2,700 parking spaces within unenclosed parking (default of 1,080,000 square feet) for a total of 2,120,000 square feet of covered parking. However, as shown in Table IV.M.2-2 (Estimated Project Wastewater Generation—Proposed Development Program) of the Draft EIR, the Project would result in a total of approximately 1,503,600 square feet of covered parking. The Project would only include approximately 1,014,000 square feet of enclosed parking and approximately 489,600 square feet of unenclosed parking. From an electricity usage standpoint, unenclosed space requires lighting and enclosed space requires both ventilation and lighting. Based on this information, potential GHG emissions and electricity usage associated with parking were conservative and overstated by including 616,400 square feet of additional covered parking (2,120,000 square feet less 1,503,600 square feet).

The Project would result in approximately 213,500 square feet of covered basecamp areas (approximately 144,000 square feet enclosed and approximately 69,500 square feet unenclosed). The Project would also include 158,100 square feet of uncovered basecamp. However, the uncovered basecamp areas would not require mechanical ventilation or lighting. In addition, the Mobility Hub would include approximately 36,000 square feet of covered areas that would not be fully enclosed (Table IV.M.2-2, Estimated Project Wastewater Generation—Proposed Development Program, in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft EIR). Basecamp and Mobility Hub would result in approximately 250,000 square feet of covered areas. Thus, the Draft EIR's GHG analysis, which conservatively included 616,400 square feet of additional covered parking, accounted for lighting electricity usage from uses in this area. In response to this comment, electricity from the ventilation of 118,000 square feet of the 144,000 square feet of enclosed basecamp areas was specifically accounted for in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). This clarification does not change any of the impact conclusions in the Draft EIR. Overall, lighting and ventilation associated with basecamp and Mobility Hub operations would represent approximately three percent of the total electricity usage from the Project.

While existing basecamp and production activities occasionally require the use of small portable generators when electrical hookups are not available, the Project will provide a sufficient number of electrical hookups in basecamp areas such that use of portable generators will not be needed. Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of additional electrical hookups at all basecamp areas. Diesel trucks, including food trucks accessing basecamps, would travel on-site for short distances and would plug into electric power when parked in lieu of the use of small portable generators. For purposes of the analysis included as Appendix FEIR-9 of this Final EIR, electricity usage associated with the electrical hookups were all considered new (i.e., no credit for electricity usage associated with existing electrical hookups) to be conservative. In addition, a PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to include four EV chargers at the Mobility Hub for future electrical shuttles.

As discussed on pages IV.A-43 to IV.A-44 of Section IV.A, Air Quality, of the Draft EIR, CalEEMod does not calculate criteria pollutant emissions from regional power plants associated with building electricity use. When electricity is used in buildings, the electricity generation typically takes place off-site at power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users.⁸¹ Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered the maximum feasible level of mitigation for stack emissions. Therefore, electricity usage associated with the basecamp areas and the Mobility Hub would not change air pollutant emissions presented in the Draft EIR. As discussed previously, vehicle traffic associated with basecamp activity, including vehicle trips, and idling, are already accounted for in the empirical trip generation parameters used in the Draft EIR. As discussed in Response to Comment No. 26-E.1-18, although the Draft EIR does not assume the construction of new paint booths, it is expected that VOC emission from operational activities, including VOCs from miscellaneous uses at basecamps, would be less than or equal to those of the existing conditions. Electricity associated with basecamp areas and the Mobility Hub, which were described in the Draft EIR, were further detailed and analyzed in response to comments on the Draft EIR and are included within the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). This analysis confirms that impacts associated with basecamp and the Mobility Hub were accounted for in the air quality, GHG, and energy impact analyses in the Draft EIR, and there are no changed conclusions and no new significant impacts.

⁸¹ California Air Pollution Control Officers Association, CalEEMod User's Guide, Appendix C, Emission Calculation Details for CalEEMod (Page C-53), April 2022.

Comment No. 26-E.1-29

13. The DEIR does not evaluate the potential impacts of phased construction and off-site emissions sources on sensitive receptors such as childcare and education facilities and residences that will be located on the Project site.
- a. As noted in Pages II-33 and II-34 of the DEIR, the Project Applicant is seeking a development agreement with a term of 20-years which could allow for a phased construction that could extend the full buildout year to approximately 2043. This indicates that the initial phases of the project may be operational before construction begins for the later phases. Hence, the air quality and health risk impacts associated with the construction of the later Project phases on the sensitive land uses that would be operational on the project site should be evaluated.
 - b. As described in Chapter II of the DEIR, the project will include sensitive land uses such as childcare and education facilities and residences (sleeping quarters for on-site personnel). As noted in Chapter 5 of SCAQMD's CEQA Handbook,¹⁶ the DEIR should evaluate the potential air quality and health risk impacts on these sensitive receptors from emission sources in the vicinity of the project and integrate site design features to mitigate these impacts.
 - c. As noted in Comment 4, there are several sources of toxic air contaminants during the project's operation. The impacts of these sources on the sensitive receptors that will be located on the Project site should be evaluated in the DEIR.

¹⁶ SCAQMD. 1993. CEQA Air Quality Handbook.

Response to Comment No. 26-E.1-29

Please refer to Response to Comment No. 26-26, which discusses impacts to potential on-site receptors (i.e., a potential childcare use). In addition, the commenter's statement that the Project Description includes residences or educational facilities is incorrect. Refer to Topical Response No. 3, Permitted On-Site Uses. The Project would not include uses where individuals could stay for extended periods (years) but would, instead, as listed on page II-16 in Section II, Project Description, of the Draft EIR, include sleeping quarters for certain on-site personnel, such as security guards with long overnight shifts. These uses would not be considered sensitive receptors.

Refer to Response to Comment No. 26-E.1-24 regarding the Draft EIR's analysis of the long-term buildout scenario.

As discussed in Response to Comment No. 26-E.1-2, in response to comments, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA assesses health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include diesel exhaust, architectural coatings, char broilers and other fugitive emissions. Receptors analyzed in the HRA include sensitive uses and commercial uses adjacent to the Project Site. Although not required for CEQA purposes, Project on-site receptors were also analyzed for informational purposes. As discussed in Response to Comment No. 26-E.1-2, the HRA confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds. As discussed in Response to Comment No. 26-E.1-24, the 32-month buildout scenario modeled for the HRA reflects a conservative assessment of potential Project health risk impacts as compared to the 20-year buildout scenario. See Response to Comment No. 26-E.1-18 for a detailed discussion of on-site operational sources of TAC.

Comment No. 26-E.1-30

14. On Page IV.G-28 of Chapter D_IVG, the DEIR states that construction and operational activities evaluated with respect to groundwater quality and hydrology include potential dewatering activities during construction. In Chapter D_IVG the DEIR further states that dewatering activities are anticipated during construction, which would require the installation and operation of temporary pumps and filtration in accordance with NPDES requirements. Additionally, as discussed in greater detail in our comments on Hydrology and Water Supply, since the groundwater depth is quite shallow, and with artesian conditions, there is a potential need for dewatering activities both during project construction and operation. However, the DEIR does not appear to account for dewatering activities in its construction and operational air quality analysis. Because the DEIR acknowledges in Chapter D_IVG that dewatering activities are anticipated, emissions from these equipment (e.g., pumps, trucks, etc.) must be accounted for in the DEIR's air quality, greenhouse gas, and energy analyses.

Response to Comment No. 26-E.1-30

As discussed above in Response to Comment No. 26-E.1-7, the Project will require temporary construction dewatering but not permanent dewatering. The proposed subterranean structures will be designed to resist the hydrostatic pressure and will be waterproofed, such that a permanent dewatering system (post-construction dewatering) will not be required. The temporary dewatering system will be decommissioned and removed following completion of the individual subterranean structures.

The commenter is inaccurate in their statement that the Draft EIR did not account for dewatering during construction activities. Please see the CalEEMod modeling output files

(specifically pdf page 31) provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, which shows that the excavation phase includes four pumps, the mat foundation phase includes six pumps, and the structure/enclosure phase includes two pumps, some of which would be used for dewatering. Moreover, the grading phase includes approximately 40 delivery trips and would include any delivery trips necessitated by dewatering activities. In addition, prior to dewatering, some additional shoring would be required during pre-excavation (concurrent with demolition activities), along with electricity associated with pumping activities. This additional equipment and electricity usage is analyzed and included within Appendix FEIR-9 of this Final EIR and does not change any of the impact conclusions in the Draft EIR.

Comment No. 26-E.1-31

15. As described previously, the Project site is within the City of Los Angeles Methane Zone and is therefore impacted by naturally occurring hydrogen sulfide. In addition to posing health risks, hydrogen sulfide is a highly odorous gas. The DEIR should evaluate the potential impacts associated with the release hydrogen sulfide and other odorous compounds released during project construction (particularly during soil excavation) and operation (from the tar collection system in the southwestern corner of the Project site and methane mitigation systems for buildings on the Project site). Note also that the DEIR is not clear if additional collection systems will be required, and the DEIR should more clearly evaluate this issue. And in that case if additional systems are required, the DEIR should evaluate and disclose the potential air quality impacts associated with those.

Response to Comment No. 26-E.1-31

Refer to Response to Comment No. 26-38 regarding odor monitoring.

In regard to additional collection systems, following extensive subsurface investigations and sampling, documented in the Site Summary Report (Appendix G.1 of the Draft EIR), naturally-occurring tar was noted only in an isolated area near the southwest boundary of the Project Site where the existing tar collection system is located; refer to Figure IV.F-1, Hazards and Hazardous Materials Site Map, on page IV.F-26 of the Draft EIR (and revised Figure IV.F-1 in Section III, Revisions, Clarifications, and Corrections to the Draft EIR). Testing and proper disposal of any excavated soil impacted by naturally occurring oil and/or tar will follow the sampling, testing and disposal procedures described in the Soil Management Plan (Appendix B of the Site Summary Report). For more information, refer to Response to Comment Nos. 13-4, 13-6, and 16-28. Based on the sampling performed, additional tar collection systems would not be necessary.

Comment No. 26-E.1-32

16. The building heights allowable under the proposed project's specific plan could impact peak pollutant concentrations for sensitive receptors adjacent to the project site. Because the dominant wind direction is from the south-west, the wake region from the new development will cover the roadway and thus create potential recirculation of the pollutants emitted in that region. The emissions from the traffic at the crossing between West Beverly Boulevard and Fairfax Ave and at the crossing West Beverly Boulevard and the Grove Dr could accumulate in the region behind the new development. Traffic emissions in the wake of a development with a proposed height of 130–160 ft can result in an increase in annual concentrations of ~5% while peak concentration may increase by up to 15–20%. The impact will be greater for particulate matter (PM) concentrations as compared to NO_x concentrations. Given the proximity of the sensitive receptors, and potentially substantial mobile and diesel PM emissions in this location, the DEIR should evaluate the potential of these unique localized air quality impacts to ensure that the appropriate project design features or mitigation measures are implemented.

Response to Comment No. 26-E.1-32

The content of this comment is similar to the content of Comment No. 26-E.1-2. Please see Response to Comment No. 26-E.1-2.

Comment No. 26-E.1-33**GREENHOUSE GAS**

17. On page 39 of Chapter D_IV.E, the calculations involving the existing solar array are inaccurate, resulting in an underestimate of the existing GHG inventory. In Table IV.E-5 on this page, the annual emissions reduction from the existing solar array is estimated as 544 MT CO₂e. This calculation uses the 2019 LADWP grid intensity factor, and thus assumes an operational year of 2019 for the solar array. However, all other emissions in Table IV.E-5 are estimated from the CalEEMod run for existing conditions, which has an operational year of 2021. To align with the CalEEMod run, the solar emissions should be estimated using the 2021 LADWP grid intensity.
18. In Table IV.M1-6, footnote L, the total water demand for the existing site and the proposed project are estimated based on billing records obtained by Los Angeles Department of Water and Power (LADWP). The DEIR has not incorporated any natural gas and electricity data for the existing uses. The DEIR included such information for water. It is not clear why this effort was only made for water and

not natural gas and electricity. The DEIR should provide greater transparency on this issue and for consistency also use existing data on natural gas and electricity usage for the existing conditions.

Response to Comment No. 26-E.1-33

Please refer to Response to Comment No. 26-73 regarding the existing solar array.

With regard to the commenter's suggestion to use existing utility bills to estimate the Project's natural gas and electricity assumptions, the Draft EIR utilized CalEEMod default energy usage rates, based on 2005 Title 24 standards (applicable to buildings built in 2005), which conservatively do not reflect the age of the existing buildings (which are 50+ years old and less energy efficient in comparison to 2005 standards). Based on CalEEMod default energy usage factors, energy usage for the existing uses would be lower than what would be estimated assuming the 2021 utility data. Thus, the Draft EIR's use of CalEEMod to estimate the baseline emissions was conservative because it resulted in a lower level of baseline emissions and, by extension, a larger incremental change in emissions caused by the Project. This additional context to clarify the conservative rationale for using CalEEMod default energy usage factors is explained in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR) and does not result in changes to the existing GHG emissions inventory. Updated emissions, estimated using CalEEMod 2022.1.1 and 2021 utility data, are presented in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR).

Comment No. 26-E.1-34

19. There are numerous assumptions in the CalEEMod analysis that do not appear to be internally consistent or accurate.
 - a. The GHG analysis does not provide sufficient detail on how the electricity intensity factors for the analysis were estimated. While PDF Page 310 of DEIR Appendix B presents the electricity intensity factors, this table calculates the CO2 emission factor based on Renewable Portfolio Standard (RPS) benchmarks without consideration of the current electricity intensity factor for LADWP and does not provide substantial evidence regarding the methodology used to derive the final emission factor used in the analysis. Additionally, the table is internally inconsistent presenting a carbon intensity of 520 lbs/MWh for 2026 in the first part of the table, but then presenting 585 lbs/MWh for 2026 in the second part which is then used in the CalEEMod runs.

- b. On page IV.E-78, Table IV.E-11, footnote c, it is claimed that CalEEMod defaults were used for all land uses, however, there are differences between the CalEEMod defaults and the resulting electricity usage factors for each land use used in the CalEEMod runs.
- c. On PDF Page 10 in DEIR Appendix D, it is noted that the energy intensity factor for the Industrial Park land use was changed from CalEEMod 2020 defaults to “MBS (2017-2018 average demand)”. [sic] This same comment is provided in the CalEEMod runs on PDF Pages 99, 109, 119, 266, 276, 286, 296, 341, 350, and 359 of DEIR Appendix B. However, there is no evidence or documentation provided to substantiate this value, which is 9% lower than the CalEEMod2020 default electricity factor.

Response to Comment No. 26-E.1-34

As discussed on PDF page 15 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the carbon intensity (lbs/MWh) for electricity generation was calculated for the Project’s 2026 buildout year based on LADWP projections for year 2026 (approximately 585 lbs of CO_{2e} per MWh). LADWP’s carbon intensity projections take into account SB 100 and SB 350 RPS requirements for renewable energy and include RPS percentages by milestone year mandated in SB 100, along with LADWP-specific historical data (RPS percentage and corresponding carbon intensity). The forecast function within Microsoft Excel was used to forecast future year LADWP carbon intensity factors. While the forecasted value for Year 2026 shows 520 lbs of CO_{2e} per MWh (LADWP, 2016 IRP goal for 2026), the calculated value of 585 lbs of CO_{2e} per MWh was based on historical and projected years (Year 2015-2020, 2026, 2030, 2036, 2045). Thus, the table in Appendix B of the Draft EIR referenced in this comment is not internally inconsistent as the carbon intensity of 520 lbs/MWh for 2026 was only one of many data points used to calculate the carbon intensity factor for 2026 (585 lbs/MWh). The CalEEMod runs correctly used a carbon intensity factor of 585 lbs/MWh for 2026.

The Draft EIR provides substantial evidence (LADWP, 2016 IRP goal for 2026) to use a 2026 carbon intensity factor of 520 lbs of CO_{2e} per MWh based on the provided data. However, the calculated value based on all of the historical and projected years of data was 585 lbs of CO_{2e} per MWh. Thus, the Draft EIR conservatively used an LADWP 2026 carbon intensity factor of 585 lbs of CO_{2e} per MWh as it would result in more Project-related GHG emissions from the use of electricity than a carbon intensity factor of 520 lbs of CO_{2e} per MWh. Subsequent to the publication of the Draft EIR, LADWP’s 2021 Power Content Label was released and shows that LADWP has a CO_{2e} intensity of 609 lbs/MWh and 35.2 percent renewables. Since the 2026 RPS is 46 percent, it would convert as follows: $609 / (1 - 0.352) * (1 - 0.46)$ which equals approximately 508 lbs of CO_{2e} per MWh, notably lower than the 585 lbs of CO_{2e} per MWh used in the Draft EIR.

Thus, the Draft EIR provided a conservative LADWP CO_{2e} intensity factor for 2026 (585 lbs of CO_{2e} per MWh).

CalEEMod default energy usage factors were used for most of the Project's land uses with some exceptions. Please refer to PDF page 308 of the Draft EIR Appendix B for parking structure energy usage calculations, which included an adjustment to the electricity usage factors related to ventilation and lighting, in order to reflect more recent requirements not included in the CalEEMod 2020 default factors and to provide more refined electricity usage from parking structure areas. The ventilation and lighting energy usage factors reflect consistency with Section 120.6(c) of the 2013 Building Energy Efficiency Standards (Mandatory Requirements for Enclosed Parking Garages) and energy use data provided in the updated 2018 Energy Star Reference.⁸²

With regard to modification of default CalEEMod energy usage factors for the Industrial Park use, an electricity usage rate for the proposed sound stages was developed based on 2017-2018 utility bills from Manhattan Beach Studios (MBS) in which electricity bills were separately available for each sound stage. To develop a future sound stage kW/sf/yr rate that would reflect a more modern-energy efficient use, the total annual electricity usage for the MBS stages (built in 1999) is representative of modern sound stages) and was divided by the total square footage of the sound stages, resulting in a rate of 11.34 kWh/sf/yr. Since natural gas meters at MBS were not directly metered for each individual stage, the same calculation method was not available. Instead, the Draft EIR used the CalEEMod land use type of industrial park to represent the proposed sound stages for natural gas. The 2017–2018 utility bills from MBS are included within the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR).

Comment No. 26-E.1-35

20. The DEIR does not utilize the most recent version of CalEEMod and the Emission FACTor (EMFAC) model.

- a. As noted on Page IV.A-44 of the DEIR, the CalEEMod2020.4.0 model uses EMFAC2017 emission factors. EMFAC2021, which is available in CalEEMod2022, has been available for over a year.
- b. On Page IV.E-48 of the DEIR, it is noted that CalEEMod defaults are used for the electricity usage factors, which is referenced as CalEEMod2020.4.0 on

⁸² USEPA, Energy Star Portfolio Manager, Technical Reference, Parking and the ENERGY STAR Score in the United States and Canada, August 2018.

Page IV.E-47. The DEIR should evaluate if electricity usage factors for each land use should incorporate the CalEEMod 2022 default electricity usage factors, which are based on 2019 consumption estimates using the California Energy Commissions' (CEC's) 2018–2030 Uncalibrated Commercial Sector Forecast and 2019 Residential Appliance Saturation Survey (RASS).¹⁷ CalEEMod2020.4.0 relies on a 2009 RASS and 2002 CEC sponsored California Commercial End Use Survey (CEUS) for non-residential land uses¹⁸.

¹⁷ CalEEMod2022 Appendix D, Technical Source Documentation for Emissions Calculations. Available at: https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf. Accessed: August 2021.

¹⁸ CalEEMod2020.4.0 Appendix E, Technical Source Documentation for Emissions Calculations. Available at: <http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-e2020-4-0.pdf?sfvrsn=6>. Accessed: August 2021.

Response to Comment No. 26-E.1-35

Please see Response to Comment No. 26-E.1-34 regarding energy usage factors used for calculating energy usage.

CalEEMod 2020.4.0 was the most current model available at the time the Draft EIR was published. CalEEMod 2022.1 was released on May 27, 2022, as a soft release (commonly referred to as a beta test version). CalEEMod 2022.1.1 was approved for full launch on December 21, 2022, after 17 separate updates. Therefore, it was reasonable to prepare the Draft EIR using the then-current stable version of the CalEEMod model available. Nonetheless, Project emissions using CalEEMod 2022.1.1 have been prepared and are included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR). Overall, the results of CalEEMod 2022.1.1 in comparison to CalEEMod 2020.4.0 are similar. However, increased electrification of the Project to account for the City's new all-electric buildings ordinance (which was adopted after the Draft EIR was published) would increase GHG emissions in comparison to what was reported in Table IV.C-11 (Annual Project (Conceptual Land Use Program) GHG Emissions Summary (2026 Buildout Year)) of the Draft EIR. Electricity generation only takes into account carbon intensity at the buildout year and does not take into account decreasing carbon intensity in subsequent years required by SB 100, which accelerated the State's Renewable Portfolio Standard (RPS) target dates. The RPS requires utilities to supply 100 percent renewable energy by 2045. Thus, overall Project-related GHG emissions would similarly decrease over time as increased renewable energy is available. Without increased electrification of the Project under the City's all-electric buildings ordinance, GHG emissions from natural gas use would not be reduced in future years. As discussed in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would continue to support GHG reduction measures detailed in the SCAG 2020-2045 RTP/SCS, LA's Green New Deal and Senate Bill 375. Therefore, increased

electrification of the Project would not have a significant impact with respect to GHG emissions, and it would not create any new significant impacts related to GHG emissions or result in a substantial increase in the severity of a previously identified significant impact in the Draft EIR. The updated analysis confirms the Draft EIR's conclusions of less-than-significant impacts and does not affect any of its significance determinations.

Comment No. 26-E.1-36

21. On PDF Page 309 of Appendix B, the DEIR provides an unsubstantiated GHG emission reduction for electric vehicle parking. This calculation notes in footnote 4 that 20% of the miles charged would be driven by the electric vehicle. However, in the actual calculation a value of 10% is used, with no basis given for either of these values. The DEIR also reduces the energy consumption of the charging stations by 90% thereby underestimating the total electricity usage for the charging stations by 90%. As a result, the DEIR has failed to substantiate the Project's electricity demand on-site and the emissions generated from electricity.
22. On Pages IV.E-39, IV.E-78 and IV.E-84, the DEIR provides unsubstantiated GHG emissions for emergency generator use in the existing conditions, project buildout, and land use exchange scenarios. In Page 13 of DEIR Appendix B, the equation to calculate annual emergency generator GHG emissions is provided, and it is noted that the total emissions are estimated based on the generator horsepower and hours of usage. However, the DEIR does not provide the generator horsepower or usage data in any of the report sections or appendices, and therefore the DEIR lacks substantial evidence to support these assumptions and the reported emissions.

Response to Comment No. 26-E.1-36

The calculation of GHG emissions reduction for electric vehicle parking in the Draft EIR is consistent with City policy. In addition, the same methodology included in Table 5-4 (GHG Emissions Reductions for Commercial Development Area Electric Vehicle Charging Stations) was utilized by the commenter and included in Appendix 2.1-A, Ramboll Environ, Greenhouse Gas Emissions Technical Report, for Mission Village, Los Angeles County, California, October 2016. This same methodology was also used in the AB 900 Application for the Hollywood & Wilcox Mixed-Use Project prepared by the City and Eyestone in 2019. In the AB 900 application process, CARB expressed a concern that the reduction in GHG emissions related to EV chargers may be overstated as it would assume that all chargers would be used 100 percent of the time and all charged miles would be consumed by trips related to the project. Based on directions from CARB and the City, an assumption that 20 percent of the miles charged at the project's EV charger stations would be driven by the charged vehicles on project-related trips was used in the AB 900 Application for the

Hollywood & Wilcox Mixed-Use Project. This direction from CARB and the City takes into account that fully-charged electric vehicles are typically driven from their homes and do not meaningfully deplete their charge by commuting to work, so that any charge, if any, at the work location is minimal (e.g., in the range of 0 to 30 percent). Accordingly, the lower percentage utilized for this EV charger calculation results in a higher estimate of overall GHG emissions associated with any project analysis.

The EV charger calculation in the Draft EIR assumes that each electric vehicle that charges at a charging stall on the Project Site would displace ten percent of the VMT for an equivalent combustion (gasoline, diesel) powered vehicle arriving and departing the Project Site. Ten percent was chosen for the Project analysis to be extra conservative for purposes of overall GHG emissions based on prior direction from CARB and the City. Energy usage for EV chargers was based on the amount of VMT displaced from combustion vehicles, which is ten percent. This low percentage assumption results in a lower estimated GHG emission reduction for the proposed electric vehicle parking and is therefore more conservative. As an example, an employee traveling to work with a partially charged EV that then decides to plug-in at TVC while at work is unlikely to change parking spaces once fully charged. As a result, the EV charger that has a capacity to charge 25 miles per hour (250 miles over a 10-hour period) would be occupied for the work day, but would not be charging at full capacity. Based on this information, it was assumed on average that each charger would displace 25 miles of VMT or 10 percent of the total capacity of the EV charger.

As discussed above, assuming 100 percent would overstate potential GHG emission reductions associated with the EV chargers. Therefore, energy usage from EV charging was not underestimated, as incorrectly stated in this comment. Please note that Footnote 4 on PDF page 309 of Appendix B of the Draft EIR included a typographical error and has been corrected to state that 10 percent, and not 20 percent, of the miles charged would be driven by the charged vehicles on Project-related trips in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. This does not result in changes to the Draft EIR GHG emissions inventory, energy calculations, or any of the significance conclusions in the Draft EIR. Regarding the energy consumption of the charging stations, the assertion that the chargers would be at 100 percent load for the entire 10 hours of use per day as suggested in this comment is unsupported and unrealistic, and the assumptions utilized would not underestimate electricity consumption by 90 percent. Refer to the Energy Consumption Memorandum by AMA Group included in Appendix FEIR-9 of this Final EIR, which discusses and validates the energy consumption related to the charging stations used in the Draft EIR.

Information regarding emergency generator horsepower and usage data was inadvertently not included in Appendix B of the Draft EIR. This information is provided in FEIR-9 of this Final EIR. This information provides substantial evidence to support the

assumptions and the reported emissions and does not change any conclusion included in the Draft EIR.

Comment No. 26-E.1-37

23. The DEIR should consider how the Proposed Project's GHG evaluations fits relative to SCAQMD's tiered approach. SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used for greenhouse gas analyses. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions, Tier 2 is consistency with a GHG reduction plan, Tier 3 is a screening value or bright line, Tier 4 is a performance-based standard, and Tier 5 is GHG mitigation offsets.^{19,20} The proposed SCAQMD tiers are as follows:

Tier 1: Determine if CEQA categorical exemptions are applicable. If not move to Tier 2;

Tier 2: Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan (often called a Climate Action Plan) that has gone through public hearings and CEQA review, which has an approved inventory that includes monitoring, etc. If not move to Tier 3;

Tier 3: For all land use types, if projects are less than 3,000 metric tons/year of CO₂e, the project is presumed to be less than significant for GHGs. If the project exceeds 3,000 metric tons of CO₂ equivalent per year (MTCO₂e/yr); move to Tier 4. More specific screening thresholds were also provided, which include 1,400 MTCO₂e/yr for commercial projects and 3,500 MTCO₂e/yr for residential projects. These thresholds were based on a review of the Office of Planning and Research database which included 711 CEQA projects using a 90% capture approach;

Tier 4: The proposed performance standards include three options:

- a. Percent Emission Reduction Target (no further recommendation)
- b. Early Implementation of Applicable AB 32 Scoping Plan Measures (incorporated into option 3)
- c. SCAQMD Efficiency Target
 - i. For option 3, there are targets for 2020 and 2035, using an approach similar to the BAAQMD Thresholds. The proposed 2020 target is a 4.8 MT/year CO₂e per service population project-level threshold (land use employment only). The proposed 2035 target is a 3.0 MT/year CO₂e per

service population project-level threshold and incorporation of Sustainable Communities and Climate Protection Act of 2008 or SB 375 regional targets.

Tier 5: Off-site mitigation for life of project (30 years), if this threshold is to be used, GHG emissions must be mitigated to less than the Tier 3 screening significance threshold. The SCAQMD clarified that offsets should have a 30-year project life, should be real, quantifiable, verifiable, and surplus and will be considered in the following prioritized manner:

- Project design feature/onsite reduction measures;
- Offsite within neighborhood;
- Offsite within district;
- Offsite within state;
- Offsite out of state; and
- Substitution allowed via enforceable commitment (e.g., when an offset project ends prematurely).

If the Project cannot meet any of the Tiers, it is presumed to be significant for GHG emissions.

¹⁹ South Coast Air Quality Management District, Board Meeting Date: December 5, 2008, Agenda No. 31, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans for use by the AQMD, website. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2)<http://www.aqmd.gov/hb/2008/December/081231a.htm>. Accessed: August 2022.

²⁰ SCAQMD 2010. CEQA Significance Thresholds Working Group Meeting #15. September 28. Available at [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf?sfvrsn=2). Accessed: August 2022.

Response to Comment No. 26-E.1-37

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim 10,000 MTCO₂e/yr GHG significance threshold for projects for which the SCAQMD is lead agency (e.g., stationary sources, rules, and plans). This comment references SCAQMD's proposed, but not adopted, tiered approach and significance thresholds. This comment's logic that the Draft EIR should have relied upon SCAQMD's draft tiered approach and thresholds proposed nearly 13 years ago, even though SCAQMD has taken no further action since to seek approval of this tiered approach and significance thresholds, is flawed. The Draft EIR did not use this tiered approach and significance thresholds, as neither the City of Los Angeles nor SCAQMD has adopted them and made

them applicable to the Project. Instead, a significance determination was made based on the Project's consistency with applicable regulatory plans and policies to reduce GHG emissions.

As discussed on pages IV.E-39 to IV.E-41 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, Section 15064.4 of the CEQA Guidelines provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Lead agencies should consider several factors in determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for a cumulative impact analysis (see CEQA Guidelines Section 15130(f)). The CEQA Guidelines were amended in response to SB 97. In particular, the amendments specify that compliance with a GHG emissions reduction plan may appropriately be used as a threshold to determine whether a project's cumulative GHG impact is less than significant.

Thus, per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found as being not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."⁸³ Thus, CEQA Guidelines

⁸³ CEQA Guidelines Section 15064(h)(3).

Section 15064(h)(3) allows a lead agency to make a finding of less-than-significant impact on GHG emissions if the project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

In the absence of any adopted numeric threshold, the significance of a project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 Climate Change Scoping Plan, which meets the criteria for appropriate analysis under the CEQA Guidelines.

The Draft EIR provides a thorough analysis of the Project's GHG impacts within Section IV.E, Greenhouse Gas Emissions, of the Draft EIR in compliance with CEQA and City policy. The analysis includes a quantification of construction and operational GHG emissions, quantification of applicable reduction measures, and analysis of consistency with applicable local plans and policies. However, the threshold of significance adopted by the City for the CEQA GHG analysis is qualitative and based on the Project's consistency with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Thus, although provided for informational purposes only, the quantitative data and analysis demonstrate with substantial evidence that the Project's consistency with applicable laws, regulations, plans, and policies in fact results in notable GHG emissions reductions. Furthermore, SCAQMD did not provide Draft EIR comments on potential GHG impact nor did SCAQMD recommend the tiered approach for analysis of GHG impacts cited in this comment. Please refer to Comment Letter No. 1 for SCAQMD's comments.

Comment No. 26-E.1-38

24. SCAQMD has suggested several greenhouse gas mitigation measures in its comments²¹ on proposed project DEIRs and NOPs. Some examples are listed below for the DEIR to consider and address:

- a. Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the project buildout

of 20423 the DEIR should evaluate how the Project will align with these standards.

- i. Given the project buildout of 2043 the DEIR should evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. For example, there have been a number of recent ZE truck regulations that have been passed or are currently being considered by CARB, which will result in an increasing number of ZE trucks in future years. Charging stations for ZE trucks can have a large energy demand (upwards of 1 MW per charger) which could substantially increase the demand on existing electricity infrastructure at the project site. Given that the proposed project includes a long-term buildout scenario, the DEIR must evaluate the impact on Energy and Utilities and Service Systems from increased penetration of ZE trucks in future years, including an assessment of impacts if ZE or NZE trucks are included as a project mitigation measure.
- ii. Include the requirement in applicable bid documents, purchase orders, and contracts.
- b. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- c. Use light colored paving and roofing materials.

²¹ SCAQMD Comment Letters—Year 2022. Available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/commenting-agency/Comment-Letters2022>. Accessed: August 2022.

Response to Comment No. 26-E.1-38

In a comment letter submitted on the Draft EIR (Comment Letter No. 1), the SCAQMD did not recommend the measures cited in this comment to reduce GHG emissions.

As presented in Table IV.E-9 on pages IV.E-72 and IV.E-73, and discussed on page IV.E-83 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in less than significant emissions of GHGs and would be consistent with applicable plans, policies, and regulations and, thus, no mitigation is required. Furthermore, SCAQMD has not recommended these GHG mitigation measures for this Project in their comment letter. Nonetheless, as stated on page IV.E-51 of the Draft EIR, the Project

would be designed to support the EV charging requirements of the City's Green Building Ordinance.

For a discussion of ZE and NZE hauling trucks during construction, please see Response to Comment No. 26-39. With respect to operations, the Draft EIR concluded that air quality and GHG impacts would be less than significant during operations, and no mitigation is required. Further, while ZE and NZE truck use will occur in the future, it is not within the Project's operational influence to ensure that only ZE or NZE vehicles operate at the Project Site. During operations, numerous independent productions will utilize on-site facilities, each with their own unique operational needs. These productions will utilize various independent contractors, who may themselves subcontract other entities, including small businesses, to provide goods and services to meet those needs. There is simply no feasible mechanism to fairly apply and enforce such a requirement given the diverse needs of, and multitudes of entities involved in, the Project's unique studio operational uses.

Development of commercial ZE and NZE technologies is ongoing and further development is necessary to meet the requirements of CARB's adopted Advanced Clean Trucks program, in-development Advanced Clean Fleets program, and any other future ZE and NZE vehicle programs or policies. Moreover, the needs of commercial ZE and NZE vehicles have changed dramatically over the past decade, and, as the adoption of ZE and NZE trucks increases and new ZE and NZE vehicles technologies emerge, the needs will continue to evolve. Thus, as stated on page IV.E-51 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project will be constructed in compliance with the City's Green Building Ordinance, which reflects the applicable ZE and NZE vehicle charging and support infrastructure needs projected at the time of Project construction. Additionally, although not all future ZE and NZE vehicles may be powered by electricity, Project Design Feature GHG-PDF-2 requires the Project to incorporate, at a minimum, 2 million kilowatt-hours of annual photovoltaic generation capacity, which would reduce the Project's electrical demand.

As discussed on page IV.A-44 in Section IV.A, Air Quality, and on page IV.E-48 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, mobile source operational emissions were estimated using emission rates from the current version of CalEEMod, which do not account for the use of ZE and NZE trucks and do not account for improvements to fuel economy or emissions standards beyond 2026. Therefore, Project operational mobile source emissions conservatively overestimate emissions for this source. The truck trips estimated for the Project in the Draft EIR represent the reasonably foreseeable trips which could be associated with Project operations. Due to the conservative vehicle emissions estimates in the Draft EIR, actual future operational mobile source emissions are expected to be lower than those presented in the Draft EIR. Further, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation

of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

In support of future ZE and NZE trucks, Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at basecamp areas during operations. Trucks accessing basecamps would travel on-site for short distances and would plug into electric power when parked in lieu of use of small portable generators (e.g., food trucks). These electric hookups could also be used for charging ZE and NZE trucks. Project Design Feature GHG-PDF-3 also includes a provision to include four EV chargers at the Mobility Hub for future electrical shuttles.

Refer to Response to Comment No. 26-40 regarding light colored paving and roofing.

Comment No. 26-E.1-39

25. The California Air Resources Board (CARB) has also presented GHG mitigation measures in comment letters on project EIRs,²² which are also listed below for the DEIR to consider and address:

Construction Measures

- a. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- b. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- c. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

- d. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard starting in the year 2022.

Operation Measures

- a. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
 - b. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
 - c. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.
 - d. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.
26. Additionally, CARB's 2017 Scoping Plan Update Appendix B²³ provides GHG mitigation measures which have been listed here for the DEIR to consider and address:

Construction Measures

- a. Divert and recycle construction and demolition waste, and use locally-sourced building materials with a high recycled material content to the greatest extent feasible.
- b. Minimize tree removal, and mitigate indirect GHG emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance.
- c. Utilize existing grid power for electric energy rather than operating temporary gasoline/diesel powered generators Increase use of electric and renewable fuel powered construction equipment and require renewable diesel fuel where commercially available.

Operation Measures

- a. Allow for new construction to install fewer on-site parking spaces than required by local municipal building code, if appropriate.
- b. Provide on- and off-site safety improvements for bike, pedestrian, and transit connections, and/or implement relevant improvements identified in an applicable bicycle and/or pedestrian master plan.
- c. Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size developments.
- d. Require organic collection in new developments.
- e. Achieve Zero Net Energy performance targets prior to dates required by CALGreen.
- f. Require the design of bike lanes to connect to the regional bicycle network.
- g. Expand urban forestry and green infrastructure in new land development.
- h. Require gas outlets in residential backyards for use with outdoor cooking appliances such as gas barbeques if natural gas service is available.
- i. Require the installation of electrical outlets on the exterior walls of both the front and back of residences to promote the use of electric landscape maintenance equipment.
- j. Require the design of the electric boxes in new residential unit garages to promote electric vehicle usage.
- k. Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands.
- l. Require large-scale residential developments and commercial buildings to report energy use, and set specific targets for per-capita energy use.
- m. Require each residential and commercial building to utilize low flow water fixtures such as low flow toilets and faucets.
- n. Incorporate water retention in the design of parking lots and landscaping.
- o. Require the development project to propose an off-site mitigation project which should generate carbon credits equivalent to the anticipated GHG emission reductions. This would be implemented via an approved protocol

for carbon credits from California Air Pollution Control Officers Association (CAPCOA), the California Air Resources Board, or other similar entities determined acceptable by the local air district.

- p. Require the project to purchase carbon credits from the CAPCOA GHG Reduction Exchange Program, American Carbon Registry (ACR), Climate Action Reserve (CAR) or other similar carbon credit registry determined to be acceptable by the local air district.
- q. Encourage the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism to implement its offsite mitigation measure for GHG emissions and that will facilitate the State's efforts in achieving the GHG emission reduction goal.

²² CARB CEQA Letters for Freight Facilities. Available at: <https://ww2.arb.ca.gov/resources/documents/california-environmental-quality-act-letters-freight-facilities>. Accessed: August 2022.

²³ CARB. 2017. Appendix B Local Action. Available at: https://ww3.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf. Accessed: August 2022.

Response to Comment No. 26-E.1-39

The commenter recommends a number of GHG mitigation measures; however, the Draft EIR concluded that GHG impacts would be less than significant, and therefore mitigation is not required. Accordingly, consideration of the suggested measures is not required under CEQA. The Draft EIR details various PDFs and mitigation measures included in the Project which already incorporate many of the suggested measures. All recommended measures have been considered, compared to existing PDFs and mitigation measures, and, if not already present in the document, analyzed for applicability and feasibility as follows:

25.Construction.a. The suggested measure is already addressed through Project Design Feature AIR-PDF-1, which requires the use of grid-power in lieu of portable generators. Additionally, CARB's ATCM already require vehicle idling to be limited to no more than five minutes.

25.Construction.b. The suggested measure is already addressed through Project Design Feature AIR-PDF-1, which requires the use of grid-power in lieu of portable generators, and through Mitigation Measure AIR-MM-4, which requires that equipment be maintained and operated in accordance with manufacturer specifications. This includes, as applicable, the specified infrastructure necessary to support the safe and proper operation of Project equipment.

25.Construction.c. The suggested measure is a duplicate of a measure suggested in Comment No. 26-40. See Response to Comment No. 26-40.

25.Construction.d. The suggested measure is a duplicate of a measure suggested in Comment No. 26-40. See Response to Comment No. 26-40.

26.Construction.a. The suggested measure is already addressed through the City's Green Building Ordinance. As stated on page IV.E-51 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would be constructed consistent with the requirements of the City's Green Building Ordinance which, among other requirements, mandates the recycling and/or salvage and reuse of a minimum of 65 percent of non-hazardous construction materials and demolition debris.

26.Construction.b. The suggested measure is already addressed in the Project Description, which, as discussed on page II-25 of the Draft EIR, would include, at a minimum, 28,900 square feet of public-facing open space along the Project Site boundary which would include landscaping with drought tolerant native tree and shrub species, shade trees, and would incorporate existing street tree and plant selections where feasible.

26.Construction.c. The suggested measure is already addressed through Project Design Feature AIR-PDF-1, which requires the use of grid-power in lieu of portable generators. Renewable diesel fuel may be used during Project construction. However, due to uncertainties in the Project construction schedule and commercial availability of renewable diesel fuel in the Project area, it is not possible to ensure that such fuel will be available in the necessary quantities during the Project construction period.

As presented in the Draft EIR and discussed above, implementation of the Project would not result in significant operational GHG impacts and thus, no mitigation is required. Nonetheless, many of the measures recommended by the commenter are already included in the Project through PDFs, and through mitigation measures incorporated pursuant to other environmental topics as discussed below.

25.Operation.a. The suggested measure is already addressed through the City's Green Building Ordinance. As detailed on page IV.E-51 in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would be designed consistent with the City's Green Building Ordinance EV charging infrastructure requirements. Additionally, a PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring all on-site operational equipment (e.g., forklifts, aerial lifts, carts, street sweepers, and landscaping equipment) to be powered by electricity.

25.Operation.b. and c. Please see Response to Comment No. 26-E.1-38. As discussed therein, operational requirements for ZE and NZE trucks would be infeasible.

25.Operation.d. CARB ATCM requirements already limit the idling of trucks to no more than five minutes and no additional measure is necessary.

26.Operation.a., b., and f. The suggested measures are addressed through Project Design Feature TR-PDF-2.

26.Operation.c., h., i., j., and k. The suggested measures are not applicable to the Project (i.e., no residential or public lands).

26.Operation.d. The suggested measure would largely be implemented through compliance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an onsite recycling area or room of specified size.

26.Operation.e. The Project would comply with the requirements of CALGreen and additionally comply with the City's new all-electric buildings ordinance.

26.Operation.g. and m. The suggested measure is already addressed through Project Design Feature GHG-PDF-1, which mandates that new buildings to be designed to meet the equivalent of LEED Gold or higher sustainability standards. These standards require design elements, like those suggested by the commenter, to include green infrastructure in new land development and reduce operational water consumption including the use of low flow fixtures.

26.Operation.n. The suggested measure is already addressed in the Project Description, as discussed on page II-33 of the Draft EIR, which states that the Project would incorporate water-efficient plantings with drought-tolerant species and would incorporate permeable paving where appropriate.

26.Operation.l., o., p., and q. As presented in Subsection IV.E.3.d (pages IV.E-52 through IV.E-85) in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, the Project would not result in significant emissions of GHGs and would be consistent with applicable plans, policies, and regulations and thus, no mitigation is required.

Comment No. 26-E.1-40**NOISE**

27. **Page IV.I-15... (4) Local.** *Operation of Loudspeaker and Sound-amplifying Equipment.* This DEIR section does not address the applicable regulations specified within the Los Angeles Municipal Code (LAMC) Section 115 (Amplified Sound), which regulates the installation, use, and operation of loudspeaker and sound amplifying equipment. Since the DEIR indicates the proposed project will include the use of loudspeakers and amplified sound in outdoor spaces, the DEIR should address LAMC Section 115, specifically as related to the following requirements; commercial use of sound amplifying equipment within 500 feet of residential zones is prohibited, commercial use of sound amplifying equipment within 200 feet of non-residential zones is prohibited between 9:00 P.M. and 8:00 A.M. of the following day, any use of amplifying equipment upon any property adjacent to and within 200 feet of any hospital grounds, school, or church building while in use is prohibited, and sound shall not be audible at a distance in excess of 200 feet from the sound equipment.

- a. The DEIR should also address LAMC 112.01 regarding radios, television sets, and similar devices. Notably the LAMC 112.01 indicates “Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.” Given that such sources may exist with the Project, the DEIR should assess if this would be exceeded.

Response to Comment No. 26-E.1-40

LAMC Article 5 (Amplified Sound) does not apply to the Project, as the regulations under LAMC Section 115.02 only apply to amplified sound use “in or upon any public street, alley, sidewalk, park or place, or other public property.”

With respect to amplified sound, the Project’s significance criterion is based on LAMC Section 112.01, which limits the amplified sound levels so as not to exceed the ambient noise level at sensitive receptors by more than 5 decibels. As analyzed on page IV.I-45 in Section IV.I, Noise, of the Draft EIR, the amplified sound system was analyzed as part of the outdoor gathering spaces. In addition, Project Design Feature NOI-PDF-4 establishes the noise limits for any amplified sound system for outdoor gatherings on roof decks as to not exceed the City’s noise limit (i.e., an increase of 5 dBA above the ambient noise level) at any offsite noise-sensitive receptor location, consistent with LAMC Section 112.01. As provided in Table IV.I-13 in Section IV.I, Noise, of the Draft EIR, the estimated

noise levels from the outdoor uses, including amplified sound, would be below the 5-dBA significance criterion and noise impacts would be less than significant. Also note that any other outdoor amplification systems would be required to comply with Section 112.01 of the LAMC.

Comment No. 26-E.1-41

28. **Page II-16.** *Hypothetical Development Mix versus Maximum Environmental Impact.* How were the environmental operational noise impacts of the selected “hypothetical development mix” determined to be the “maximum impact”? What other development mixes were considered and how did those environmental operational noise impacts compare to the selected development mix? The “Project”, [sic] as defined in the DEIR, is not a specific project, but rather a proposed 20-year development framework for future re-development of the Television City property. In the absence of a specific project buildout/development, the environmental analyses presented in the DEIR are based on a “hypothetical development mix” that is stated to “generate the maximum impact for that environmental issue”. [sic] As related to noise impacts, the buildout scenarios are not defined or detailed and therefore the selection of the “maximum impact” scenario cannot be reviewed and confirmed. The DEIR should also evaluate and represent if noise impacts from increased operations with construction throughout the potential 20-year development may result in impacts greater than currently evaluated.

Response to Comment No. 26-E.1-41

Refer to Response to Comment No. 26-138 for the discussion of the maximum environmental impacts and the buildout timeline.

With regard to the portion of this comment regarding noise impacts from increased operations together with construction activities, note that the construction noise analysis assumed all construction activities would operate at a maximum capacity and take place at construction areas closest to the off-site receptor locations. Ongoing operations, including outdoor production activities, would generate operational noise levels that would be a minimum of 10 dBA below the construction-related noise levels. The composite effect of the concurrent occurrence of the two noise sources (i.e., operation and construction) would not generate a substantial increase in noise levels when the noise levels at the two noise sources are more than 10 dBA apart, as the addition of sound levels are performed on a logarithmic basis. Specifically, as provided by Caltrans, when two noise levels are greater than 10 dBA apart, the lower noise source does not contribute significantly (less than

0.5 dB) to the total noise level.⁸⁴ Therefore, potential concurrent operational and construction activities would not result in a substantial effect on the estimated noise impacts.

Comment No. 26-E.1-42

29. Page IV.I-18... (1) Noise-Sensitive Receptors. *Missing Noise-sensitive Receiver.* An additional noise-sensitive receptor (Rancho La Brea Adobe) located south of the project site was not included in the survey or impact assessment. Noise-sensitive receptors surrounding the project site were identified and formed the basis of the noise impact evaluation. These receptors surround the projects site to the east, north, and west. This missing residential receptor is located approximately 130 feet from the project property boundary, will be within proximity to construction activities and proposed building structures, and should be evaluated for existing conditions, potential impacts, and necessary mitigation measures.

Response to Comment No. 26-E.1-42

Refer to Response to Comment No. 26-139 regarding Project construction and the Gilmore Adobe.

Comment No. 26-E.1-43

30. Page IV.I-19... (2) Ambient Noise Levels. *Assessment of Existing Ambient Community Sound Levels.* The survey methodology used, specifically the measurement durations, is not consistent with typical community noise survey durations as specified and recommended in industry standards for assessing community noise (e.g., ANSI S12.9-1992/Part 2 (R2018)—Quantities and Procedures for Description of Environmental Sound). The existing conditions (ambient noise levels) within the community surrounding the subject property were established based on sound level measurements at 10 receptor locations. At all but one receptor location, the measurement duration was only 15 minutes during daytime hours and/or 15 minutes during late evening hours on a Monday. As such, the survey results likely do not reflect the current existing conditions during quieter weekday nighttime hours (e.g., between midnight and 6:00 A.M.) and quieter weekend daytime and nighttime hours. (The DEIR states that 15-minute measurement periods were employed as required by the City's standards. While this would be appropriate relative to determining a noise

⁸⁴ Caltrans, Technical Noise Supplement, Table 2-3, September 2013.

source's compliance with the City's standard, one 15-minute measurement is not adequate to define community sound level trends over daytime, nighttime, weekday, and weekend periods.) A more representative sampling method consistent with the ANSI standard would be over a longer period of time (e.g., up to 72 hours) including noise sensitive periods of the week such as a weekend. It should be noted that the DEIR indicates outdoor studio production activities may occur at any time and any day of the week, including weekends (Page IV.I-44).

Response to Comment No. 26-E.1-43

The ANSI S12.9-1992/Part 2 (R2018) is a recommended standard and protocol in the absence of an adopted local standard. The ANSI has not been adopted by the City and therefore is not applicable. As explained in Response to Comment No. 26-E.1-5, the existing ambient noise measurement survey conducted for the Project is consistent with City requirements as specified in LAMC Section 111.01(a). Therefore, the requested ambient noise measurement in accordance with ANSI S12.9-1992/Part 2 (R2018) is not required by CEQA or City policy. Ambient noise measurements were conducted on a typical weekday, to represent the typical ambient noise environment during which both construction activities and studio operations would occur. Also note that LAMC Section 111.0 does not specify when measurements should be taken.

As discussed on page IV.I-19 in Section IV.I, Noise, of the Draft EIR, both daytime and nighttime ambient noise measurements were conducted. As discussed therein, the nighttime ambient noise measurements at receptors R2 to R8 were conducted between 10 P.M. and 1:00 A.M. Based on the 24-hour ambient noise measurement at receptor R1 (page 4 of Appendix J, Noise Calculations Worksheets, of the Draft EIR), the lowest hourly noise level occurred at 12:00 A.M. Therefore, the measured 15-minute ambient noise measurements are representative of the quieter ambient noise levels during the nighttime hours (between 10:00 P.M. and 7:00 A.M.).

Comment No. 26-E.1-44

31. **Page IV.I-19... (2) Ambient Noise Levels.** *Assessment of Existing Production Facility Sound Levels.* What are the existing ambient sound levels within the community due to the activities and operations associated with the current production facility? Are current activities and operations compliant with all applicable noise ordinances? What is the recent history, if any, of noise complaints related to activities and operations associated with the production facility? CEQA screening and assessment processes include evaluation of substantial temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project. While the existing production facility has been part of the ambient conditions for quite some time now (since

1952), the DEIR has not addressed the expected increase in the overall production facility's noise emissions due to the proposed redevelopment and modifications that will increase the overall production facilities. Rather, the DEIR has considered the existing production facility noise emissions as part of the existing (baseline) community.

Response to Comment No. 26-E.1-44

The Project Site has operated as a studio use since 1952 and would continue to operate as a studio upon completion of the Project. The studio has not been cited for noise complaints. As stated on page IV.I-44 in the noise analysis included in Section IV.I, Noise, of the Draft EIR, outdoor studio production activities currently occur throughout the Project Site and the same activities would continue to occur upon completion of the Project. However, as discussed in detail in the Draft EIR and in Response to Comment No. 26-140, the future noise levels associated with outdoor studio production activities would be lower than the existing conditions, due to the reduction in the outdoor areas used for studio production activities and associated shielding provided by new buildings along the perimeter of the Project Site. Also refer to Response to Comment No. 26-146 for additional analysis of the outdoor production activities that confirms the Draft EIR's conclusion that Project noise impacts associated with outdoor studio production activities would be less than significant.

Comment No. 26-E.1-45

32. **Page IV.I-24... Table IV.I-6.** *Basis of Community Noise Equivalent Levels (CNEL).* Since CNEL is a 24-hour average sound level, estimating it based on one short measurement conducted during noisier daytime or evening hours potentially misrepresents the actual conditions. Note (a) within the table describes that the Community Noise Equivalent Level (CNEL) was estimated based on the short-term (15 minute) noise measurements per FTA procedures. Appendix E of the referenced FTA procedure provides guidance on the accuracies associated with long-term versus short-term measurements.

Response to Comment No. 26-E.1-45

As stated in Table IV.I-6 in Section IV.I, Noise, of the Draft EIR, the existing ambient noise levels in terms of CNEL were estimated based on the short-term noise measurements consistent with FTA procedures in Appendix E (Option 4) of the 2018 FTA guidance. Per the FTA, use of this option would moderately underestimate existing CNEL noise levels due to the use of the adjustment constant in the equations (i.e., a 2-dBA adjustment). Therefore, the noise impact analysis in the Draft EIR is conservative, as future CNEL noise levels are compared with the existing CNEL noise level. In addition, the estimated CNEL levels are consistent with the calculated traffic noise levels. Specifically,

the estimated CNEL levels of 65.9 dBA (CNEL) at receptor R2, 70.9 dBA (CNEL) at receptor R4, and 70.1 dBA (CNEL) at receptor R8 (as provided in Table IV.I-6 of the Draft EIR) are consistent with the calculated existing roadway traffic noise levels (Table IV.I-8 of the Draft EIR) of 66.1 dBA (CNEL) along The Grove Drive (in front of receptor R2), 71.0 dBA (CNEL) along Beverly Boulevard (in front of receptor R4), and 71.2 dBA (CNEL) along Fairfax Avenue (in front of receptor R8). As such, the estimated existing CNEL ambient noise levels are appropriate for use in the noise analysis.

Comment No. 26-E.1-46

33. Page IV.I-34... Project Design Feature NOI-PDF-4. *Operation of Loudspeaker and Sound-amplifying Equipment.* This Project Design Feature is not based on the minimum setback distances, the audibility provision, and the hours of operation limitations required by Los Angeles Municipal Code (LAMC) Section 115. Outdoor rooftop amplified sound systems must comply with the applicable provisions specified in Los Angeles Municipal Code (LAMC) Section 115. While NOI-PDF-4 establishes maximum noise level design limits for the speaker sound systems, regulatory compliance and the potential impact on nearby noise-sensitive neighbors are not detailed in the DEIR. This Project Design Feature should be based on the minimum setback distances, the audibility provision, and the hours of operation limitations required by the code.

Response to Comment No. 26-E.1-46

As discussed above in Response to Comment No. 26-E.1-40, LAMC Section 115 does not apply to the Project. Per Project Design Feature NOI-PDF-4, the specified noise limits for the amplified sound system are based on the distances from the Project property lines (i.e., 15 feet from the northern, southern and western property lines and 40 feet from the eastern property line). In addition, the noise limits for the amplified sound system provided in Project Design Feature NOI-PDF-4 are based on compliance with LAMC Section 112.01. As such, the speaker systems would be set back from building edges and directed away from residences.

Comment No. 26-E.1-47

34. Page IV.I-35... Construction Noise. *Construction Duration and Associated Noise Impacts.* How would construction noise impacts change if the 32-month construction period assessed in the DEIR extends through the full 20-year period to 2043 as requested in the DEIR? The DEIR does not present an evaluation that supports the conclusion that noise impacts associated with a 32-month construction schedule would be more significant than those associated with an extended 240-month construction schedule such that no other construction schedules need to be evaluated. While construction “intensity” may be slightly

lower over the 240-month construction schedule, similar construction activities that have been deemed potentially significant would still occur throughout the project site in proximity to neighbors. Additionally, at that point, construction noise impacts would no longer be considered temporary or periodic in nature given the 20-year duration. Since the noise impacts are driven by not only the magnitude of the noise but also the duration of the noise, an extended construction time frame of 20 years could be deemed significant. Lastly the DEIR does not address potential future construction noise impacts or mitigation measures relative to possible changes in the future ambient/background conditions that may occur over 20-years.

Response to Comment No. 26-E.1-47

Refer to Response to Comment No. 26-138 for the discussion of noise impacts associated with the 32-month and 20-year construction period. As stated in Response to Comment No. 26-138, the estimated noise levels were calculated based on a conservative scenario in which all pieces of construction equipment were assumed to operate simultaneously and assumed to be located at the construction area nearest to the sensitive receptors. As construction is completed and moves to another location, the construction noise levels would be further reduced due to distance attenuation and additional noise reduction provided by the newly constructed building located between the new construction area and the receptor. Therefore, construction noise impacts would be reduced to a less-than-significant level once construction activity is moved further away.

Comment No. 26-E.1-48

35. **Page IV.I-42... Table IV.I-11. Off-Site Construction Truck Noise.** The increases in the ambient sound levels due to off-site construction truck noise are likely underestimated. Since the existing ambient conditions are not based on the quietest time of day or week, the actual increases to the existing ambient conditions are unknown and likely underestimated. As such, the identified exceedances over the significance criteria are potentially higher than reported. Additionally, cases reported as no significant impact are possibly potentially significant. This is particularly critical during the mat foundation stage of construction when truck traffic may occur 24 hours per day for 5 days at a rate of 50 trucks per hour (1,000 trucks per day).

Response to Comment No. 26-E.1-48

Refer to Response to Comment No. 26-E.1-5 for a discussion of the City's ambient noise measurement requirements. It is unclear from the commenter as to what cases the commenter is referring to that may have been incorrectly reported. Rather, Section IV.I,

Noise, of the Draft EIR comprehensively evaluates potential noise impacts of the Project and discloses those impacts that may be potentially significant.

Per the L.A. CEQA Thresholds Guide, the significance criterion is equivalent to the measured daytime ambient noise levels (see Table IV.I-1-6 in Section IV.I, Noise, of the Draft EIR) plus 5 dBA. As provided on page IV.I-19 in Section IV.I, Noise, of the Draft EIR, the daytime ambient noise levels were measured in the middle of the day (between 10:00 A.M. and 2:00 P.M.) and the nighttime ambient noise levels were measured between 10:00 P.M. and 1:00 A.M. The ambient noise measurements were measured in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.⁸⁵ The daytime hour noise measurements represent the typical ambient noise level during the grading/excavation phase (the peak period with maximum number of trucks per hour), between 7:00 A.M. and 4:00 P.M. In addition, the measured ambient noise levels during the daytime hours (between 10:00 A.M. and 2:00 P.M.) would typically represent the quieter ambient during the daytime hours, as it is outside of the peak traffic hours (generally with higher ambient noise levels). As discussed in Response to Comment No. 26-E.1-43, the measured nighttime ambient noise levels during the nighttime hours represent the quieter ambient noise levels during the nighttime hours (between 10:00 P.M. and 7:00 A.M.). As provided on page IV.I-41 in Section IV.I, Noise, of the Draft EIR, the mat foundation pour could occur during the nighttime hours, if permitted by the Executive Director of the Board of Police Commissioners. As analyzed therein, the estimated noise levels due to concrete trucks for the mat foundation concrete pour, would exceed the nighttime ambient noise levels along Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard, by 6.7 dBA L_{eq} , 5.7 dBA L_{eq} , and 5.1 dBA L_{eq} , respectively. This considers the noise penalties associated with human sensitivity to noise during evening and night hours. As such, the off-site construction vehicle noise analysis within the Draft EIR does not underestimate off-site construction truck noise as the baseline ambient noise levels were measured during the quieter time (for both daytime and nighttime hour measurements).

Comment No. 26-E.1-49

36. **Page IV.I-43... (iii) Summary of Construction Noise Impacts.** *Construction Noise Management Plan.* DEIR concludes that temporary noise impacts associated with the Project's construction activities would be potentially significant. How will these community impacts be managed? Consideration should have been given to implementing a Construction Noise Management Plan to facilitate direct communication with the neighboring community and immediate action related to construction noise complaints?

⁸⁵ LAMC Section 111.01.

- a. DEIR Section V (Page V-13) outlines rejected alternatives related to construction noise and vibration mitigation. While measures to reduce construction noise impacts on the apartment building (Broadcast Center Apartments) along the eastern boundary of the Project Site would be challenging, they would not be infeasible. With respect to construction noise, the two alternatives included moving all construction activities 700 feet away from boundary or moving all construction activities 100 feet away from boundary and erecting a 30-foot sound barrier wall. Given the lack of project-specific buildout details available at this time, the specifics around construction activities and phasing are unknown. As such, the rejection of the alternatives may be premature without further detailed considerations of construction noise planning focused on the specific buildout design. Versions of these alternatives with detailed consideration of an overall plan that includes practical measures such as imposing minimum allowable distance to the boundary for specific activities, phasing activities, employing reduced-noise equipment (for both small, powered hand tools as well as large combustion engine equipment), sequencing the use of noise barrier walls along the boundary, employing mobile noise control barriers or enclosures to shield activities, etc., may be feasible. Similar consideration applies to construction vibration mitigation.

Response to Comment No. 26-E.1-49

Please refer to Response to Comment No. 26-137, which discusses the additions to Project Design Feature NOI-PDF-1 in response to comments, including a telephone hotline for the public to communicate with the Project construction team, and the use of alternative construction equipment to minimize construction noise, where feasible.

As discussed on pages IV.I-56 to IV.I-59 in Section IV.I, Noise, of the Draft EIR, noise Mitigation Measure NOI-MM-1 will be implemented to reduce the construction noise impact to the off-site noise-sensitive receptors to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the grade-level of off-site sensitive uses by a minimum of 16 dBA at the residential uses adjacent to the Project Site to the east (receptor location R1), by a minimum of 16 dBA at Pan Pacific Park on the east side of The Grove Drive (receptor location R2), by a minimum 9 dBA at the motel uses on the north side of Beverly Boulevard (receptor location R3), by a minimum of 5 dBA at the school uses on the north side of Beverly Boulevard (receptor location R4), by a minimum of 8 dBA at the residential uses on Ogden Drive (receptor location R5), by a minimum of 15 dBA at the residential use on Hayworth Avenue (receptor location R7), and by a minimum of 10 dBA at the residential and hotel uses on the west side of Fairfax Avenue (receptor location R8). As presented in Table IV.I-19 on page IV.I-58 in Section

IV.I, Noise, of the Draft EIR, the estimated construction-related noise levels at the uses represented by off-site sensitive receptor locations R2, R3, R4, R5, R7, and R8 would be reduced to a less-than-significant level with the implementation of Mitigation Measure NOI-MM-1.

See Response to Comment No. 26-136 regarding modification to Mitigation Measure NOI-MM-1 to specify a sound barrier of 30 feet in height along the shared property line with the Broadcast Center Apartments (i.e., the Shared Eastern Property Line). As discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the 30-foot-high sound barrier would further reduce noise levels at the Broadcast Center Apartments by up to 5 dBA at Level 3.

As analyzed in the Draft EIR, the estimated vibration levels associated with human annoyance due to on-site construction equipment would exceed the significance threshold at one of the receptor locations (receptor location R1). The impacts would occur when heavy construction equipment (e.g., large bulldozer, caisson drilling, and loaded trucks) operate within 80 feet of the affected building. As discussed on pages IV.I-66 and IV.I-67 in Section IV.I, Noise, of the Draft EIR, mitigation measures considered to reduce vibration impacts included the installation of a wave barrier. However, as stated therein and confirmed by AECOM (see Appendix FEIR-17 of this Final EIR), the installation of the wave barrier would be cost prohibitive, as the wave barrier must be very deep and long to be effective, and is considered infeasible.⁸⁶ In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment, e.g., drill rig and large excavator. As discussed in the Section V, Alternatives, of the Draft EIR, providing an 80-foot buffer zone to reduce the temporary construction vibration impacts would render a substantial portion of the Project Site undevelopable, and a significant construction-related noise impact would continue to occur. As such, it was determined to be infeasible.

Therefore, the Draft EIR correctly concluded that there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts during construction.

Comment No. 26-E.1-50

37. Page IV.I-43... (b) Operational Noise. *Limited Consideration of Noise-producing On-site Mechanical (Building) Equipment.* The specifics of the building design and various equipment (specific location, type, size, operation, etc.) are not detailed in the DEIR but are necessary to verify the analyses and results presented within the DEIR. The DEIR only generally identifies project

⁸⁶ Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

operational noise sources as outdoor mechanical equipment, loading dock, and trash compactors. The DEIR does not detail specific mechanical equipment likely to be included on-site such as rooftop fans, rooftop air-conditioning units, building ventilation louvers, emergency power generators, electrical transformers, etc.

- a. The results of the limited operational analysis are carried through to the DEIR's cumulative impacts discussion (Page IV.I-72, Part (i)). Accordingly, the on-site stationary noise source cumulative impacts determination of less than significant is not based on an analysis of a specific project design that includes all planned mechanical equipment.

Response to Comment No. 26-E.1-50

Mechanical equipment was included in the evaluation of noise impacts in Section IV.I, Noise, of the Draft EIR. The analysis is based on Figure II-4, Conceptual Site Plan, of the Draft EIR and also Project Design Feature NOI-PDF-3, which requires that outdoor mounted mechanical equipment be screened from the view of the offsite noise-sensitive receptors. By breaking the line-of-sight from adjacent sensitive receptors, this measure would shield noise from the rooftop equipment and reduce exposure for sensitive receptors. In addition, as stated on page IV.I-43 in Section IV.I, Noise, of the Draft EIR, the Project would comply with LAMC Section 112.02, which limits the noise levels from the building mechanical equipment, so as to not increase the ambient noise levels at the offsite receptor locations by more than 5 dBA. As all mechanical equipment would be required to comply with LAMC Section 112.02, no Project-level or cumulative noise impacts would occur from onsite mechanical equipment.

Comment No. 26-E.1-51

38. **Page IV.I-43... (b) Operational Noise.** *Limited Consideration of Studio-related Production Activities.* Outdoor production activities occurring throughout the facility, including within proximity to property boundaries and nearby noise-sensitive neighbors, can create significant and discernible noise. The potential noise emissions associated with these types of activities (specifically the worst-case scenario) as well as the occasional unique nature of the noise (such as impulse noise from stage doors slamming, stage gun shots, explosions, etc.) are not considered in the operational noise analysis presented in the DEIR. The DEIR notes that these activities will occur at any time and any day of the week, including weekends.

- a. In particular, the operational analysis does not consider the potential operational noise impacts on the nearest residential neighbors (Broadcast Center Apartments) as related to both production activities and internal traffic

given the addition of new adjacent drive areas and entry points from both Beverly Boulevard and The Grove Drive. Noise impacts on the neighboring residences/apartments from internal traffic and operational/studio-production activities in these adjacent areas should be evaluated. Specific consideration should be given to the acoustical effects created by the Project's potential 160-foot tall buildings positioned approximately 37 feet from the Broadcast Center building as sound reflections will affect the resulting sound levels at the upper apartment elevations.

- b. On-site production activities will include the movement and use of heavy trucks. These trucks are anticipated to operate within proximity to neighboring noise-sensitive receivers (residences). The DEIR has not specifically included potential truck noise and vibration as part of the Project operational impacts. Assuming the usage of these trucks during late night production activities, noise and vibration may be significant.

Response to Comment No. 26-E.1-51

As discussed in Response to Comment No. 26-146, studio production activities currently occur throughout the Project Site and would continue to occur sitewide with implementation of the Project. However, as discussed pages IV.I-44 to IV.I-45 in Section IV.I, Noise, of the Draft EIR, the noise levels associated with outdoor studio production would be lower than the existing conditions, due to the reduction in the outdoor area used for studio production activities. Also, refer to Response to Comment Nos. 26-145 and 26-146 for the additional quantitative noise analysis that was completed in response to public comments that confirms that noise levels associated with outdoor production activities would be less than significant at all off-site sensitive receptors, including the Broadcast Center Apartments.

Please refer to Response to Comment No. 26-141 for the additional noise analysis regarding onsite trucks. As demonstrated therein, noise impacts associated with onsite trucks would be less than significant. Therefore, the Draft EIR correctly concluded that noise impacts associated with outdoor studio production activities would be less than significant.

Comment No. 26-E.1-52

- 39. **Page IV.I-43... (b) Operational Noise. Helipad Operations.** As part of the Project, the helipad would be upgraded (elevated) and would continue to operate in the same general location. While potential noise impacts have been identified as less than significant, no detail is provided regarding the existing sound levels associated with flights as well as the potential change in frequency of flights, times of departures and arrivals, and the type of equipment. Based on the

potential increase in studio production activities within the Project property, it is reasonable to assume helipad activities may increase as well, which would increase sound level exposure on noise-sensitive neighbors during flight activities.

Response to Comment No. 26-E.1-52

Refer to Response to Comment Nos. 16-87 and 26-15 for a discussion of helipad operations.

Comment No. 26-E.1-53

40. **Page 44... Table IV.I-12. *Mechanical Equipment Noise*.** The potential noise level increase due to the proposed project mechanical equipment and subsequently the impact, may be underestimated Existing ambient noise levels listed in the table are each based on one 15-minute measurement conducted between the hours of 10:00 PM and 1:00 AM on a weekday (Monday into Tuesday). This window of time is typically not the quietest time of the day when people are the most sensitive to noise. As such, the potential noise level increase due to the proposed project mechanical equipment may be underestimated.

Response to Comment No. 26-E.1-53

Refer to Response to Comment No. 26-E.1-5 for a discussion of ambient noise measurement standards.

Based on the 24-hour ambient noise measurement conducted at receptor location R1 (provided in Appendix J of the Draft EIR), the ambient noise levels between 10:00 P.M. and 1:00 A.M. (51.9 to 54.1 dBA) are similar to the ambient noise levels between 2:00 A.M. and 4:00 A.M. (52.1 to 53.7 dBA). Therefore, the measured short-term ambient noise levels between 10:00 P.M. and 1:00 A.M. would be representative of the nighttime ambient noise levels. In addition, as discussed above in Response to Comment No. 26-E.1-50, the Project would comply with LAMC Section 112.02, which regulates noise from mechanical equipment.

Comment No. 26-E.1-54

41. **Page IV.I-44... Studio-Related Production. *Sound Stage Shell Structure Design*.** The DEIR indicates “The sound stage shell structures would be designed to provide sound insulation to ensure that any noise generated is contained within the sound stages.... As such, noise impacts associated with the operation of additional sound stages would be less than significant.” This

conclusion does not appear to be based on a quantitative analysis. The sound insulation (i.e., acoustical design requirements) for the sound stage buildings should be identified and specified as requirements. The DEIR should also incorporate into its analysis, the situations where the stage is not closed. The shell will not protect offsite sources from sound when the stage is open, which can occur during set loading/construction/unloading when you will have sound from equipment, people, music, etc.

42. **Page IV.I-44... Studio-Related Production.** *Studio Production Activities Set-back.* NOI-PDF-5 limits studio-related activities to no closer than 200 feet to the apartments along the east property boundary during nighttime hours, however the noise associated with these outdoor activities are not quantified to confirm 200 feet is an adequate set-back. Additionally, there is no 200-foot set-back requirement during daytime hours and the nighttime set-back only applies to the apartments along the east boundary. Additional detail and analysis should be presented to assess the adequacy of this design feature. And other noise-sensitive receptors, such as the residence near the south boundary, should be considered. The DEIR indicates these activities may occur at any time and day of the week, including weekends. The DEIR does not define “outdoor studio production activities” in NOI-PDF-5, therefore it’s not clear what activities would be allowed within the 200 foot setback.

Response to Comment No. 26-E.1-54

Please refer to Response to Comment No. 26-145 regarding noise associated with open stage doors. Also refer to Response to Comment No. 26-135 regarding noise impacts associated with Project operations and to Response to Comment No. 26-146 for the additional quantitative noise analysis associated with the outdoor studio production activities. This analysis confirms that potential impacts associated with outdoor studio production activities would be less than significant for both daytime and nighttime hours. Note that Project Design Feature NOI-PDF-5 provides for the continued prohibition of outdoor studio activities within 200 feet of the Shared Eastern Property Line during nighttime hours. This is the only portion of the Project Site that is adjacent to residential uses. With this PDF and the overall reduction in outdoor production activities, there would not be an increase in noise levels at the Broadcast Center Apartments due to outdoor production activities. Currently, there are no residential uses near the southern boundary. However, additional noise analysis was also conducted for the Gilmore Adobe, located south of the Project Site, for informational purposes in response to public comments. Refer to Response to Comment No. 26-139 for further discussion of the Gilmore Adobe. With regard to the definition of outdoor production activities, refer to pages IV.I-44 to IV.I-45 in Section IV.I, Noise, of the Draft EIR.

Comment No. 26-E.1-55**43. Page IV.I-54... (iii) Composite Noise Level Impacts from Project Operations.**

The evaluation of potential impacts related to the LAMC Leq(hourly) significance threshold of < 5 dBA due to the composite on-site operations (including mechanical equipment, production activities, etc., but exclusive of roadway noise sources) is not presented. This should be evaluated and presented to supplement Table IV.I-18. Of concern, is the fact the existing hourly Leq is unknown at all locations except R1. In that case, LAMC Section 111.03 prescribes an assumed ambient noise level of 50 dBA for residentially-zoned [sic] receivers and 60 dBA for commercially-zoned receivers. Under those assumptions, the non-roadway levels listed in the referenced table result in non-roadway composite sound levels that exceed the significance threshold at some locations.

Response to Comment No. 26-E.1-55

Refer to Response to Comment No. 26-E.1-5 above regarding how the existing ambient noise levels have been properly identified in accordance with applicable LAMC requirements. Also note that the noise levels in LAMC Section 111.03 are utilized when the existing ambient noise levels are not known, which is not the case for the Project. Refer to Response to Comment No. 26-143 regarding the composite noise analysis that was accurately completed for the Project in accordance with the 2006 L.A. CEQA Thresholds Guide.

Comment No. 26-E.1-56**44. Page IV.I-56... Mitigation Measure NOI-MM-1. *Construction Noise Barrier Walls.*** This mitigation measure requires temporary and impermeable sound barrier walls at specific locations during construction activities. The performance specification for each wall and wall location is based on a noise reduction at the ground level of each receptor location. How will construction noise impacts be minimized at elevated levels at each receptor location, as applicable?

- a. Additionally, the DEIR states a construction noise barrier wall between the apartment building (R1—The Broadcast Center) and the Project would need to be as tall as the apartment building to be an effective barrier of construction noise and indicates it would not be feasible. However, the details around the effectiveness of the noise barrier wall will depend on the design and construction details of the building to be constructed, which are unknown at this time. The effectiveness and reasonableness of a temporary construction noise barrier to reduce construction noise impacts at the

apartment building should be determined based on the specific construction to occur along that boundary.

- b. The new buildings adjacent to the Broadcast Center Apartments may be constructed up to 160 feet tall. As this structure is built and increases in height throughout construction, construction noise mitigation measures at increasing elevations should be considered to mitigate the noise impacts to the elevated apartment levels. This might include temporary noise barrier screening along the east face of the new building.

Response to Comment No. 26-E.1-56

As provided on page IV.I-56 in Section IV.I, Noise, of the Draft EIR, noise reduction performance for the temporary construction noise barriers is specified at the ground level, as this is location where the noise reduction performance can be verified. The construction noise barrier performance would not be as effective at the upper levels of the off-site noise-sensitive receptor location R1, as discussed in the Draft EIR. Therefore, construction noise impacts at the upper levels of receptor location R1 would remain significant. Mitigation Measure NOI-MM-1 requires that the design of the temporary construction noise barrier be verified by a noise consultant for compliance with the measure as part of the plan check approval process.

Construction noise levels are dominated by the major construction equipment (i.e., major noise sources) located at the ground level (e.g., excavator, tractor, loader, backhoe, bore/drill rig, grader, scraper, and dozers). Construction activities that take place at the upper levels of the Project buildings would involve smaller construction equipment (i.e., hand tools), which would generate lower noise levels than the large earth-moving equipment at the ground level. As the construction progresses vertically, interior fit-out and exterior enclosure activities progress simultaneously. Generally speaking, interior activities have a longer duration than that for the exterior enclosure. In most cases, the exterior is fully enveloped long before the interior activities are complete. It is impractical to erect a large scale, perimeter noise barrier and remove/relocate it at a frequency necessary to maintain a suitable buffer to prevent a deterrent to safe exterior wall installation activities. Specifically, exterior wall installation involves working near a building edge that presents a fall safety hazard. Regulatory requirements require that suitable safety equipment be utilized to address the fall potential in addition to equipment that expedites the installation. As such, the addition of a temporary perimeter noise barrier could impede safety and/or the installation of equipment. Furthermore, based on typical construction logistics for multi-level buildings, the exterior enclosure will provide the necessary sound reduction. Therefore, there is no need for temporary noise barriers at the façade.

Also note that Mitigation Measure NOI-MM-1 has been augmented to include a 30-foot-high sound barrier along the Shared Eastern Property Line to further reduce noise levels at the Broadcast Center Apartments, as discussed in Response to Comment No. 26-136.

Comment No. 26-E.1-57

45. **Appendix J—Noise Calculation Worksheets.** *Sound Level Assumption for all Mechanical Equipment.* The SoundPlan noise modelling information, specifically the mechanical equipment sound level data, indicates all project mechanical equipment (heating, ventilating, air-conditioning, etc.) were modelled as a simple point source with a sound power level (Lw) of 90 dBA. This is a very simplistic modelling approach. As stated within other comments herein, the specifics of the project design and this associated equipment is not included within the DEIR, therefore the adequacy of these results cannot be directly confirmed. There is concern some off-site project sound levels and possibly the associated impacts may be underestimated.

Response to Comment No. 26-E.1-57

Over 40 locations where mechanical equipment could be located were modeled in SoundPLAN (see Appendix J, Noise Calculation Worksheets, of the Draft EIR, pdf page 149 for a list of these point sources and the sound power of each piece of equipment on the interior and perimeter of buildings). Detailed information on the sound power levels for the building mechanical equipment are not available at this stage of the Project, as the design of the individual buildings are developed during the City's regulatory building permit process. Therefore, sound power levels for typical commercial buildings, 90 dBA (as provided in pdf pages 149 and 150 of Appendix J of the Draft EIR), were used for the noise analysis. This level of analysis within the Draft EIR is consistent with City policy and CEQA and does not rely on undue speculation of building designs, though the location of equipment on the perimeter of buildings ensures a conservative analysis in forecasting noise exposure at off-site receptors. In addition, the noise levels for mechanical equipment (HVAC equipment) are typically modeled as individual point sources. Furthermore, as stated on page IV.I-43 in Section IV.I, Noise, of the Draft EIR, the Project would be required to comply with the LAMC Section 112.02, which limits the noise levels from building mechanical equipment so as to not increase the ambient noise levels at the off-site receptor locations by more than 5 dBA.

Comment No. 26-E.1-58

46. **Appendix J—Noise Calculation Worksheets.** *Calculation Methodology and Results.* The DEIR fails to provide adequate detail regarding input assumptions, sound propagation assumptions, and environmental sound modelling results for

the specific proposed project development to adequately assess the appropriateness of the calculation results. It is anticipated the noise modelling methodology utilized may not have accounted for acoustical parameters such as sound source directionality, building reflections, ground reflection, etc.

Response to Comment No. 26-E.1-58

As discussed on page IV.I-33 in Section IV.I, Noise, of the Draft EIR, the onsite stationary noise levels were calculated using the SoundPLAN (Version 8.2) computer noise prediction model. SoundPLAN is a three-dimensional computer noise prediction model, which calculates sound (noise) propagation using approved engineering procedures and incorporates national and international noise standards. In addition, SoundPLAN also considers the specifics of land topography and sound reflections from the ground and nearby buildings. This calculation tool is widely used by acoustical engineers as a noise modeling tool for environmental noise analysis. Noise source input levels and results from the SoundPLAN are provided in Appendix J of the Draft EIR (pdf pages 149 to 209). This includes an itemized list of point and area sources assumed in the modeling of noise impacts. Sound sources, including outdoor mechanical equipment, loading and trash compactors, are based on omnidirectional sources (i.e., sound radiating to all directions). Amplified sound systems are based on point sources with directivity based on a typical outdoor loudspeaker. People at outdoor gathering spaces and parking areas are modeled as area sources that generate a cumulative amount of noise from a given area. As discussed above, the SoundPLAN model accounts for building reflections and ground reflections (based on hard surfaces) (i.e., the model calculates the potential noise reflection from the noise sources due to the building's adjacency to such noise sources to the receptor locations).

Comment No. 26-E.1-59

HYDROLOGY AND WATER SUPPLY

Stormwater Run-off—Volume Estimates and Discharge Management

47. The DEIR presented the existing and proposed stormwater runoff flows for the 50-year storm event in **Table IV.G-1 on Page IV.G-36**. The DEIR section, on page IV.G-35 and in Table IV.G-1, cites the Hydrology Report, which is included as Appendix H to the DEIR, as the source for the surface flow rate data. **Table 2, PDF Page 35 in Appendix H** presented the existing and proposed peak flow rates for stormwater for the 50-year frequency design storm event runoff (Q_{50}). The table has the flow rate of 53.47 cubic feet per second (cfs), and further shows no increase in stormwater runoff due to the project. **PDF Page 44-48, Figure 4 in Appendix H** provided the stormwater runoff estimates using

HydroCalc for the existing and proposed Project Site. There are several inconsistencies observed in the report which are described below:

- a. The report should explain how Figure 4 relates to Table 2 and the key outputs used to make the Q_{50} calculations. There doesn't appear to be any change between the existing and proposed scenarios and given no change to the inputs there is no value in providing separate results in Figure 4.

Response to Comment No. 26-E.1-59

As illustrated in Figure IV.G-1 on page IV.G-21 of the Draft EIR (and as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR), the existing drainage areas and overall drainage patterns would remain unchanged as a result of Project implementation. As discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR and the Hydrology and Water Quality Report (Appendix H of the Draft EIR), the Project Site would continue to be comprised of approximately 90 percent impervious surfaces following Project buildout. In addition, as determined in the Hydrology and Water Quality Report and as summarized in Table IV.G-1 on page IV.G-36 of the Draft EIR, the overall surface water flow rate would not change with implementation of the Project. Specifically, existing runoff flows during a 50-year storm event are 53.53 cfs.⁸⁷ As shown in Table IV.G-1 of the Draft EIR and Tables 1 and 2 of the Hydrology and Water Quality Report, runoff flows during Project operation would remain the same at 53.53 cfs during a 50-year storm event. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Furthermore, the Project's stormwater infrastructure would be designed to convey the 50-year storm to the designated discharge location. Inlets within the Project Site would be sized to eliminate the potential for ponding. Accordingly, drainage within the Project Site during operations would be similar to current conditions.

As discussed on pages IV.G-27 to IV.G-28 of the Draft EIR and pages 27 to 28 of the Hydrology and Water Quality Report, as part of the surface water hydrologic analysis, stormwater runoff generated from the Project Site was quantified using the Modified Rational Method. The equation used in the Modified Rational Method is $Q=C \times I \times A$, where "Q" equals the volumetric flow, "C" equals the runoff coefficient, "I" equals the rainfall intensity, and "A" equals the basin area. The Modified Rational Method assumes that the runoff coefficient (C) remains constant during a storm. The runoff coefficient is a function of both the soil characteristics and the percentage of impervious surfaces in the drainage area. The Modified Rational Method assumes that a steady, uniform rainfall rate will

⁸⁷ Table IV.G-1 in Section IV.G, Hydrology and Water Quality, of the Draft EIR included a clerical error that has been corrected in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The existing and proposed flow rate is 53.53 cfs.

produce maximum runoff when all parts of the basin area are contributing to outflow. This occurs when the storm event lasts longer than the time of concentration. The time of concentration (T_c) is the time it takes for rain in the most hydrologically remote part of the basin area to reach the outlet. As part of its Hydrology Manual, the Los Angeles County Department of Public Works developed a time of concentration calculator, HydroCalc, to automate time of concentration calculations as well as the peak runoff rates and volumes using the Modified Rational Method design criteria. The data input requirements include: sub-area size, soil type, land use, flow path length, flow path slope and rainfall isohyet. HydroCalc was used to calculate the storm water peak runoff flow rate for the Project Site by evaluating an individual sub-area independent of all adjacent subareas. Figure 4 of the Hydrology and Water Quality Report sets forth the HydroCalc results and shows the analysis of the existing drainage areas and the proposed drainage areas using the existing impervious area percentage and the proposed Project's maximum impervious area percentage, which are the same. The other inputs used to determine the surface water hydrology include the area in acres, the flow path length and slope, the rainfall depth, and the soil type. Since the Project Site will have the same physical area in the pre- and post-Project condition, the area is the same as well as the rainfall depth and soil type which are determined by the Los Angeles County Hydrology Manual.

The flow path length and slope in the final, built condition will likely be longer and shallower as the storm water will follow a more circuitous path through collection and conveyance systems. Flow path lengths that are longer and shallower reduce the peak flow, so the analysis in the Draft EIR, which keeps the flow path length and slope the same as existing conditions, is a conservative calculation. The runoff peak flow values are associated with the 50-year 24-hour storm event. Refer to Section 2 of the Hydrology and Water Quality Report.

Comment No. 26-E.1-60

- b. **PDF Page 43, Figure 3 of Appendix H** provided estimates for the volume of stormwater captured (mitigated volume of 567,854 gallons) that do not align with the data presented on **PDF Page 30** of this Appendix, which states that "The Project will need to capture and use up to 625,000 gallons of water on-site". [sic] It is unclear if these values represent annual, monthly, or daily capture volumes and how these values are related to estimates provided in Table 2.

Response to Comment No. 26-E.1-60

Refer to Response to Comment No. 26-E.1-6 and Section III, Revisions, Clarifications, and Corrections to the Draft EIR, which clarifies the volume of the stormwater treatment as up to 625,000 gallons. The stormwater volume required for LID

treatment is unrelated to the values in Table 2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, which analyzes the 50-year 24-hour storm event in the pre- and post-Project conditions.

Comment No. 26-E.1-61

- c. **PDF Page 22, Appendix H**, reported that stormwater runoff from the project will discharge toward City catch basins and underground stormwater drain pipes to ultimately discharge to Ballona Creek. There is no indication of whether the existing 24-inch stormwater pipe that connects to the Fairfax Avenue stormwater pipe would continue to convey stormwater after redevelopment. The potential impacts to surface water need to be considered unless it can be demonstrated that the stormwater runoff will be captured and used on-site.

Response to Comment No. 26-E.1-61

Refer to Response to Comment No. 26-E.1-59. The Project would implement LID BMPs, as required by the LID Ordinance; refer to Response to Comment Nos. 3-4, 3-6, 3-7, 13-6, 16-74 and 26-86. Refer to Response to Comment No. 26-111 regarding stormwater management. As discussed therein, BMP systems will be designed within the property to capture the typical urban contaminants found in stormwater. As the current stormwater is discharged without any such controls, the BMPs installed as part of the Project will be an improvement over the current conditions. In addition, the peak discharge rate of the 50-year storm event is unchanged. Therefore, the existing municipal storm drain system, including the existing 24-inch stormwater pipe that connects to the Fairfax Avenue stormwater pipe, will continue to perform as it does in the existing condition.

Comment No. 26-E.1-62

- d. **PDF Page 29. Appendix H** cites footnote #22 but does not include the footnote. The footnote is associated with the statement “According to the Preliminary Geotechnical Investigation prepared for the Project Site, groundwater infiltration is not feasible for the Project Site”. [sic] The rationale for this statement should be better explained, as it relates to the preceding paragraph.

Response to Comment No. 26-E.1-62

See footnote 22 below, which was inadvertently omitted and has been added to the Hydrology and Water Quality Report (Appendix H of the Draft EIR) as noted in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

- ²² Preliminary Geotechnical Engineering Investigation by Geotechnologies, Inc. dated March 29, 2019, and updated April 22, 2021, p. 49. Refer to the TVC 2050 Project Draft EIR, Section IV.D, Geology and Soils, for further discussion.

This Preliminary Geotechnical Engineering Investigation was included as Appendix E.1 of the Draft EIR and discussed in Section IV.D, Geology and Soils, of the Draft EIR. The inadvertent omission of this footnote does not change any analysis or conclusion in the Draft EIR.

Refer to Response to Comment No. 26-111 regarding stormwater management systems.

Comment No. 26-E.1-63

- e. **PDF Page 24 of Appendix H** states that, "...it is assumed that pollutants such as sediment, nutrients, pesticide, metals, pathogens, and oil and grease occur in the existing surface water runoff." However, there is no assessment of the level of these pollutants in the surface water runoff resulting from the proposed Project in the report. While we understand that there is no existing implementation of stormwater management best practices (BMPs) for the project site, the additional new land uses in the proposed Project could result in changes to the levels of the pollutants in the surface water runoff that would trigger the need to develop and implement BMPs.

Response to Comment No. 26-E.1-63

As discussed throughout the Draft EIR, the Project would continue the existing studio use. Refer to Response to Comment Nos. 3-7, 13-8, 16-74, and 26-111 regarding pollutants in stormwater runoff and stormwater BMPs. The current stormwater is discharged without any controls, and the BMPs installed as part of the Project would be an improvement over the current conditions. BMPs will be installed to capture and reuse the 85th percentile storm event which will significantly improve the quality of the runoff from the Project Site in accordance with LID requirements. Therefore, as stated on page IV.G-30 of the Draft EIR, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements, and impacts to surface water quality during operation of the Project would be less than significant.

Comment No. 26-E.1-64

- f. **PDF Page 35 of Appendix H** presents FEMA information specific to the Project Site and describes that a portion of the site is within minimal flood hazard and the rest of the site is within a 0.2 percent annual chance flood

hazard zone. It would be beneficial to include the FEMA panel (1605F)²⁴ and legend to the report.

²⁴ <https://msc.fema.gov/portal/search?AddressQuery=television%20city%2C%20los%20angeles#searchresultsanchor>

Response to Comment No. 26-E.1-64

The FEMA Map has been added to the Hydrology and Water Quality Report (Appendix H of the Draft EIR) in response to this comment. This addition is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-E.1-65

48. **Groundwater Dewatering:** The DEIR addresses the potential groundwater impacts from construction dewatering on **Pages IV.G-29, 30–31, 33, and 43**. However, impacts related to the potential for operational dewatering activities are not addressed. **PDF Page 25 of Appendix H** states that the depth-to-water measurements on the Project site vary from 8-30 feet. **PDF Page 34, Appendix H**, states that the project construction activities would include the excavation to a depth of approximately 15 to 45 feet below existing Project Site grade. The report further mentioned that the Project is expected to excavate 723,000 cubic yards of subsurface soil. Since the groundwater depth is quite shallow, and with artesian conditions, there is a potential need for dewatering activities both during project construction and operation. The DEIR has not adequately evaluated the potential impacts from dewatering.

- a. A potentiometric map would inform the reader about the direction of groundwater flow and temporal conditions of the water table (i.e., seasonal influence and/or localized mounding). This information should be incorporated into the DEIR evaluation of potential impacts on groundwater direction and/or flow. Without this assessment, the DEIR has not adequately evaluated the groundwater impacts.
- b. Dewatering can cause the development of hydraulic gradients that are also necessary for drawing out water towards the Site. With the possibility of off-site contamination in groundwater, dewatering can result in mobilizing the contaminants towards the Site. The DEIR limited its analysis of groundwater quality impacts from construction dewatering to the discharge of pumped groundwater and ignores potential impacts related to the subsurface migration of contaminated groundwater. (Page IV.G-31) Thus, the DEIR should provide additional analysis for potential impacts on groundwater quality due to dewatering.

- c. **PDF Page 21 of Appendix H** states that the discharges from dewatering operations during Project construction could lead to high level of fine sediments that exceed NPDES requirements. While the Appendix states that the developer must submit a Notice of Intent to discharge groundwater from these dewatering operations in accordance with the requirements of NPDES Permit No. CAG994004, the required treatment or mitigation measures that the developer would use to meet the permit limits are not documented nor discussed in the DEIR or Appendix H.
- d. **PDF Page 38 of Appendix H** states that, "...no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site..." without any reference. It is important to understand the source information and its date to verify that it is current and valid information. Per DEIR Pages IV.G-33-34, this statement forms the basis for the assessment that the Project will not have an adverse impact on groundwater levels. There is no substantial evidence provided in the DEIR to support the analysis. With significant groundwater dewatering (and expected dewatering during operations), a potential for impacts to groundwater levels in the vicinity is expected.
- e. The DEIR fails to describe the methodology that would be employed to manage these dewatering operations without impacts to surface and/or groundwater. The depth of excavation can be variable, impacting estimates of the depth of the groundwater table. A more thorough evaluation of construction and operational dewatering is required to adequately understand the impact of dewatering on the groundwater levels in the vicinity of the Project Site, including the quantity and quality of water discharged.
- f. The groundwater dewatering design and the related impacts are not adequately evaluated in the DEIR. The DEIR should at a minimum evaluate the volume of the dewatering and the radius of influence of such dewatering. To illustrate, based on some generalized assumptions of one possible dewatering scenario at the Project site, below is one estimate of the potential volume of dewatering, which indicates that there is potential large, dewatered volume that could have significant impacts to the groundwater.
- g. an [sic] estimate of the anticipated volume of dewatering (ed), there could have potentially significant impacts to the groundwater.
 - i. Range of depth of excavation: 15 feet to 45 feet (assuming average depth of 30 feet²⁵)
 - ii. Assumed Average depth of groundwater: 20 feet

- iii. Assumed Area of Site to be excavated²⁶: 25 acres (1.1 X 10⁶ square feet)
- iv. Assumed Soil Porosity: 30%²⁷ (unitless)
- v. Dewatered Volume: Average excavated saturated thickness X Area X Porosity = 3.3 X10⁶ cubic feet, or approximately 24.2 million gallons of water.

While the inputs may vary based on actual water levels, soil properties, depth, and extent of excavation, etc., project excavation to the anticipated depth with the presumed water levels indicates that the dewatering could have potentially significant impacts.

²⁵ The depth of excavation can be variable.

²⁶ Assuming the whole site area is excavated to a constant depth of 30 feet below site grade.

²⁷ Page 4, Appendix E—Geology and Soil

Response to Comment No. 26-E.1-65

As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts. As discussed therein, the temporary dewatering system would be installed and operated in accordance with the NPDES discharge permit or industrial sewer permit requirements, and the specific dewatering system will be determined during the City's building permit process. Nevertheless, in response to comments regarding the Draft EIR's dewatering analysis, an evaluation of simulated dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant.

Refer to Response to Comment No. 26-94 regarding Project Site groundwater levels.

Response to (a): Refer to page 8 of the Site Summary Report, included in Appendix G.1 of the Draft EIR, for a discussion of the historical investigations of the Project Site, including an evaluation of groundwater flow. The desktop study referenced therein was based on historical groundwater potentiometric maps from groundwater monitoring reports for the former Texaco station that was located within the Project Site boundary, which are available in the State of California Geotracker database. Review of the groundwater monitoring reports indicates groundwater flow is generally from the northeast to southwest with a range of hydraulic gradients generally between 0.005 to 0.01 feet/foot.

Per the Dewatering Report, the average hydraulic gradient is estimated to be approximately 0.008 feet/foot, and the depth to groundwater is encountered on average at approximately 10 feet below ground. Example potentiometric maps are provided in Appendix C of the Dewatering Report.

Response to (b): Refer to Response to Comment Nos. 3-7, 11-5, and 11-25 for a detailed discussion of construction dewatering and potential cone of depression and gradients estimates. In response to comments regarding the Draft EIR's dewatering analysis, an evaluation of simulated dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant. Refer to Response to Comment Nos. 11-5 and 16-85 regarding the Draft EIR's groundwater analysis.

Response to (c): The comment conflates the Construction Stormwater General Permit and the General Permit for the discharge of construction dewatering. See Response to Comment No. 11-5 for a discussion of the temporary construction dewatering, which notes that the dewatering will be subject to either a separate NPDES permit or an industrial sewer permit, depending on the point of discharge. Either permit will include effluent limitations, and may require treatment, including for sediment.

Response to (d): Refer to Response to Comment Nos. 3-7, 11-5, and 11-25 for a detailed discussion of construction dewatering. In response to comments regarding the Draft EIR's dewatering analysis, an evaluation of simulated dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant.

The State of California well database Geotracker/GAMA lists and shows the locations of supply wells (i.e., pumping wells for domestic, municipal, agricultural, industrial, and process purposes) in the State. A review of the database on February 14, 2023 found no active supply wells within 1 mile of the Project. Review of the LADWP Urban Water Management Plan (2020) found no reference to spreading grounds within 1 mile of the Site.

Response to (e): See response to item d.

Response to (f): See response to item d.

Response to (g): See response to item d.

Refer to Response to Comment No. 26-69 regarding the inaccuracies within the commenters' dewatering analysis.

Comment No. 26-E.1-66

49. **Appendix N—Water Supply Assessment** does not evaluate the water use during Project construction. **PDF Page 16, Appendix N** states that the Project would require an additional water supply of up to 301 acre-feet per year (AFY).

Response to Comment No. 26-E.1-66

Refer to Response to Comment No. 26-E.1-8 with regard to the evaluation of impacts related to water demand during construction. The statement that the Project would result in an additional (net) water demand of up to 301 afy is correct and is included in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR.

Comment No. 26-E.1-67

50. **Water Conservation Assessment:** The LADWP requires its customers to show water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage. As part of this requirement, **PDF Page [sic] 17–18, Tables IA/IB, of Appendix N** include approximately 75 AFY water savings from required City of Los Angeles ordinances, 2020 Los Angeles Plumbing Code, and Los Angeles Green Building Code. A savings of approximately 4 AFY of from additional conservation measures is listed in Table IIA and IIB (PDF Page 19). The DEIR does not adequately substantiate that water conservation is accurately calculated.

- a. **PDF Page [sic] 17–18, Table IA/IB** shows that out of the total 75 AFY of savings, approximately 38 AFY (33,907 gpd) is applied to water conservation for the cooling towers. This saving is roughly 20% of the base demand of 169,533 gpd. There is no substantial evidence to demonstrate these calculations in the report are accurate.
- b. Based on the regulations cited, the DEIR appears to be double-counting additional conservation savings of 4 AFY (as listed in **Table IIA and IIB, PDF Page 19**), via plumbing fixtures and landscaping. The water savings with dishwashers, toilets, and showerheads are already included in the calculated savings of 75 AFY, as demonstrated in the City of LA ordinance.²⁸

²⁸ https://clkrep.lacity.org/online/docs/2015/15-0458_ORD_184248_6-6-16.pdf, page 17, TABLE 99.04.303.4.2

Response to Comment No. 26-E.1-67

The WSA calculations for the Project were prepared by LADWP, the governing authority for WSAs in the City, and are based on calculated savings gained through compliance with applicable City Ordinances and Codes (refer to pages IV.M.1-14 and IV.M.1-15 of the Draft EIR). The water savings within Tables IIA and IIB of the WSA included as Appendix N of the Draft EIR are mandatory commitments that are above and beyond City regulatory requirements. These commitments are more specifically described in Appendix B of the WSA and incorporated in Project Design Feature WAT-PDF-1. The water conservation associated with the commitments by the Applicant results in a water savings of approximately four afy. There is no double counting of water savings.

As stated by LADWP in their written correspondence dated June 9, 2023 (included as Appendix C-5 in Appendix FEIR-9), with regard to cooling tower calculations, the cooling tower water demand was estimated using the requirements from Section 99.05.305.3 “Cooling Tower” of the City of Los Angeles Ordinance No. 184248 (codified in the Los Angeles Municipal Code Chapter IX Article 9 Division 5 Section 99.05.305.3), which requires cooling towers to have a minimum of six cycles of concentration. Before the Ordinance became effective in 2016, cooling towers had operated at three cycles of concentration; therefore, the increase to six cycles reduces water by 20 percent.

As further stated by LADWP in their written correspondence referenced above, with regard to double counting, as shown in Table IA and Table IB of the WSA, the Required Ordinances Water Savings are due to the codes and ordinances listed in footnote 4 of the tables. The Additional Conservation is due to the Applicant’s selection of water conservation items that save more water than required by the codes and ordinances. Please see Appendix B of the WSA (PDF pages 50–52) for the list of the Applicant’s voluntary water savings measures for the Project.

Comment No. 26-E.1-68

BIOLOGICAL RESOURCES

51. The biological resources section of the Initial Study lacks an appropriate level of detail to justify the findings of no impacts/less than significant impact.
 - a. For instance, the DEIR indicates that due to the urbanized and disturbed nature of the Project Site and the surrounding areas, it is “unlikely” any special status species would be present on site. The DEIR should provide specific data to support this conclusion such as the data provided by USFWS,

CDFW, CNPS that documents and illustrates that SSS do not occur in this area.

- b. This comment also applies to potential impacts on riparian habitat or other natural communities. The DEIR should have described more clearly the information available to support a conclusion of No Impact rather than just stating that there is no riparian/sensitive habitat in this location. For example, the DEIR did not identify the location of the nearest wetland or natural community.

Response to Comment No. 26-E.1-68

Pursuant to Section 15063(a)(3) of the CEQA Guidelines, the analysis of biological resources in the Initial Study, which is included as Appendix A of the Draft EIR, meets the requirements of CEQA. Citations containing supportive data from the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS) with regard to potential impacts to biological resources are included therein. With respect to special status species, as discussed in the Initial Study, the Project Site is located in an urbanized area and is currently developed with the Television City studio. Landscaping within the Project Site is limited to minimal ornamental landscaping and hardscape features. There is no habitat mapped by either the CDFW or the USFWS located within or near the Project Site. The nearest habitat that could support special status species is located within Topanga State Park approximately 10 miles west of the Project Site.⁸⁸ Furthermore, as stated on page 45 of the Initial Study, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.^{89,90} Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, species likely to occur on-site are limited to small, common terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site or nearby, which is documented by CDFW, USFWS, and the City, there is no evidence of any special status species at the Project Site. Therefore, as discussed under Biological Resources Threshold (b), the Initial Study correctly concluded that it is unlikely any special status species would be present on-site.

⁸⁸ U.S. Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr=7716+Beverly+Bouelvard+Los+Angeles>, accessed June 7, 2023.

⁸⁹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

⁹⁰ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

With respect to habitat, as noted above and discussed in the Initial Study, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{91,92} Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.^{93,94} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{95,96,97} Therefore, as concluded in the Initial Study, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. The nearest natural community mapped by the USEPA is in Runyon Canyon Park approximately two miles northeast of the Project Site.⁹⁸

With respect to wetlands, as stated in the Initial Study, “[n]o water bodies or state or federally protected wetlands exist on the Project Site or in the immediate vicinity.”⁹⁹ The nearest wetlands mapped by the USFWS National Wetlands Inventory mapper are located within the Wilshire Country Club approximately 1.6 miles east of the Project Site.¹⁰⁰

Contrary to the commenter’s assertion, pages 45–48 of the Initial Study adequately analyzed impacts to biological resources and provided a detailed discussion of the reasons that biological resources is not further analyzed in the Draft EIR.

⁹¹ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://wildlife.ca.gov/Data/BIOS>, accessed October 13, 2023.

⁹² United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 25, 2021.

⁹³ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

⁹⁴ Los Angeles County, Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

⁹⁵ California Department of Fish and Wildlife, BIOS, <https://wildlife.ca.gov/Data/BIOS>, accessed October 13, 2023.

⁹⁶ California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed October 13, 2023.

⁹⁷ U.S. Fish and Wildlife Service, National Wetlands Inventory, <https://fws.gov/library/collections/national-wetland-inventory>, accessed October 13, 2023.

⁹⁸ U.S. Environmental Protection Agency, NEPAassist, <https://nepassistentool.epa.gov/nepassistent/nepamap.aspx?wherestr=7716+Beverly+Boulevard+Los+Angeles>, accessed June 7, 2023.

⁹⁹ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassistent, accessed March 25, 2021.

¹⁰⁰ U.S. Fish and Wildlife Service, National Wetlands Inventory, <https://fws.gov/library/collections/national-wetland-inventory>, accessed October 13, 2023.

Comment No. 26-E.1-69**HAZARDS****Chapter IV.F—Hazards and Hazardous Materials**

52. **Section IV.F.2.b(11) (p. 34)** compares detected concentrations in subsurface investigations to commercial/industrial standards, consistent with information presented in the Site Summary Report in Appendix G. Documentation elsewhere in the DEIR indicates that an on-site daycare may be present, as well as overnight accommodations. As such, all subsurface investigation results should be compared to residential screening levels. It is also noted that the soil vapor screening levels cited in Table 4 (p. 31 of Appendix G) for gasoline range organics (GRO) and trichlorofluoromethane (TCFM) are incorrect.

Response to Comment No. 26-E.1-69

Residential screening levels will be applied for any potential childcare location. The remainder of the Project Site would include studio uses; therefore, it is appropriate for the remainder of the Project Site to use commercial/industrial screening levels. Further, engineering and design controls may be considered such as locating a potential childcare use above the ground floor or incorporating a green roof design, or clean fill import for the use. Any potential childcare use would be sited and constructed in accordance with all applicable regulatory requirements to ensure no exposure to soil, soil vapor, and/or groundwater exceeding residential screening levels would occur. Project Design Feature AIR-PDF-2 has been added to Section IV.A, Air Quality, of the Draft EIR, in response to comments. This PDF requires any future childcare use to be located a minimum of 330 feet from the existing Big Blue emergency generator to the extent it remains in use. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-E.1-70

53. **Section IV.F.3.b (p. 37)** indicates that the Soil Management Plan (SMP) included in Appendix G “details protocols to be implemented during design, construction, and **post-construction** of the Project in order to protect human health and the environment during any development activities that involve **soil disturbance**.” Given the expected dewatering activities, the DEIR should adequately evaluate and discuss if a groundwater management is necessary due to dewatering activities during construction and post-construction is warranted (i.e., Soil and Groundwater Management Plan). The SMP (p. 65 of Appendix G pdf) currently indicates that Section 6.2.4 will be updated as plans are further developed. The SMP indicates that the General Contractor shall implement any

required treatment of groundwater, but it is not clear if a permanent dewatering system will be required, and if so, what type of treatment will be required.

Response to Comment No. 26-E.1-70

Refer to Response to Comment No. 3-7. As discussed therein, the Project will require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment No. 16-64 regarding how the extracted groundwater during construction dewatering would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal method.

Comment No. 26-E.1-71

54. **Section IV.F.3.d(1)(a) (p. 40)** indicates an excavation depth of 45 feet. While the presence of tar is discussed, along with a brief discussion of a current tar removal system (IV.F.2.b(3). [p. 30]), there is no discussion of whether a tar removal system will be required during construction and how the tar will be managed.

Response to Comment No. 26-E.1-71

Refer to Response to Comment Nos. 13-4 and 16-64 regarding the tar collection system and the testing and disposal requirements for any impacted soil.

Comment No. 26-E.1-72

55. **Section IV.F.3.d Threshold (b)(1)(a)(i) (p. 42)** includes a discussion of hazardous waste generation, handling, and disposal during construction. There is no discussion of the current photovoltaic (PV) panels on the shade canopies in surface parking lots along Beverly Boulevard and Fairfax Avenue (as discussed on page 23). PV modules may contain heavy metals and be classified as hazardous waste. The DEIR should address the PV modules' relocation or waste characterization procedures.

Response to Comment No. 26-E.1-72

Refer to Response to Comment No. 26-84 regarding the existing solar panels. As discussed therein, the existing solar panels will be removed as part of the Project. Any construction waste, including the solar panels and photovoltaic cells, will be disposed of in accordance with all applicable regulatory requirements.

Comment No. 26-E.1-73

56. **Section IV.F.3.d(b)(1)(a)(i) (pgs. 43–44)** indicates that chlorinated VOCs (tetrachloroethylene [PCE] and trichloroethylene [TCE]) were detected in groundwater below their maximum contaminant levels (MCLs), with the exception of “PCE” that slightly exceeded the MCL. Based on Table 9 in the Site Summary Report (p. 36 of Appendix G), concentrations of cis-1,2-DCE, pentachlorophenol, and TCE exceeded MCLs in at least one sample. In January 2012, PCE was reported at concentrations as high as 13 µg/L and TCE at concentrations as high as 11 µg/L in groundwater in the northeast corner of the site at concentrations above MCLs. This section should be modified to accurately represent all VOC exceedances in groundwater.
57. **Section IV.F.3.d(b)(1)(a)(i) (pg. 44)**—“VOCs detected in groundwater at the Project Site are likely related to an off-site upgradient release.” No obvious upgradient source is identified in the Phase I in Appendix G or in Section IV.F.2.b(2)(b). Low-level chlorinated VOCs have been reported in groundwater beneath the eastern portion of site and are attributed to off-site source/dry cleaner (2021 Site Summary Report pgs. 10, 12, and Figure 3 [Appendix G pgs. 17, 19, and 42]). No dry cleaners to the north of the site were mentioned in either of the two previous Phase I’s. Based on EDR report for 2018 Phase I, there were two potential cleaners identified on EDR’s HIST CLEANER database from the 1930s, although there is no confirmation of actual dry cleaning activities. In January 2012, PCE was reported at concentrations as high as 13 µg/L in groundwater in the northeast corner of the site at concentrations above MCLs (2018 Phase I pgs. 17–18 [Appendix G pgs. 95-96]; 2017 Phase I p. 20 [Appendix G pg. 703]). In November 2018, TCE (12 µg/L) and cis-1,2-DCE (6.4 µg/L) were identified in groundwater above MCLs (5 µg/L and 1 µg/L, respectively) at B-1 (near eastern site boundary south of adjacent apartments) (2021 Site Summary Report, Table 9 [Appendix G, pg. 36]). From the ASTM Phase I perspective, this would be considered a Recognized Environmental Condition (REC). A more detailed analysis of the potential off-site source(s) is required, as the Phase I reports do not support that assumption. If the VOC contamination is the result of an off-site source, future dewatering activities may result in additional contamination being pulled on-site and/or beneath adjacent residences and/or schools. The 2018 Phase I identifies various adjacent properties that were listed on the Leaking Underground Storage Tank (LUST) databases and have received regulatory closure. Multiple adjacent properties were closed with methyl tertiary butyl ether (MTBE) and tertiary butyl alcohol (TBA) remaining in groundwater. (2018 Phase I, pgs. 19–20 [Appendix G pgs. 97–98]) The Hazards section does not address the effect of dewatering on these, or others within the radius-of-influence, off-site properties.

Response to Comment No. 26-E.1-73

Phase I and Phase II investigations, which are included in Appendix G of the Draft EIR and documented in the Site Summary Report (Appendix G.1 of the Draft EIR), among others, have been performed to evaluate Project Site environmental conditions pertaining to the nature and extent of impacts to soil, soil vapor, and groundwater, including the former dry cleaners upgradient of the Project Site and the presence of low levels of chlorinated VOCs, and LUST cleanup and closures at adjacent properties. Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, 16-85, 26-78, 26-83, and 26-87 regarding the Draft EIR's discussion of soil and groundwater contamination, including among other things, the extent and source of contamination, under existing conditions and the proposed Project. As explained therein, some of the contamination comes from on-site sources (e.g., low levels of PAHs and aromatic VOCs from the former Texaco station), whereas other contamination likely comes from off-site sources (e.g., chlorinated VOCs from off-site properties), as fully and adequately explained in the Draft EIR. For a detailed description of the impacts to groundwater and their source, see the Site Summary Report (Appendix G.1 of the Draft EIR).

Because the Project includes excavation below the water table, temporary construction dewatering will be required. As discussed in Response to Comment No. 11-5, temporary construction dewatering impacts were analyzed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As stated on page IV.F-44 of the Draft EIR, during construction-phase dewatering, any discharge of groundwater would comply with the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such regulatory requirements, the extracted groundwater would be chemically analyzed to determine whether the groundwater is contaminated and the appropriate treatment and/or disposal methods, if any. Thus, with compliance with applicable regulatory requirements, Project construction activities would not create or exacerbate a significant hazard to the public, neighboring properties or the environment involving the handling and disposal of extracted groundwater, and impacts would be less than significant.

Comment No. 26-E.1-74

58. **Section IV.F.3.d(b)(1)(a)(ii) (pg. 44)**—"The status of any former USTs at the former Anderson V L gas station is unknown; however, geophysical surveys have confirmed no tanks remain in the location of this former gas station." Limited details are provided in the Site Summary report regarding the geophysical investigation (i.e., area of the survey, as the Phase I notes that the Anderson gas station relocated to the south and it is not clear if both locations of the former gas station were surveyed, the effective depth of the GPR survey is not discussed). Similarly, Section IV.F.3.d(b)(1)(b)(ii) indicates "additional USTs are not anticipated as part of the Project." The possibility of encountering former

USTs should not be dismissed. The SMP addresses known below-grade structures and “unknown structures” (Section 6.4, page 66 of Appendix G). It is recommended that additional discussion regarding encountering USTs be added (e.g., potential permitting, sampling, and analysis requirements).

Response to Comment No. 26-E.1-74

The possibility of encountering USTs is not “dismissed” as claimed by the commenter. The history of the Project Site as it relates to USTs is provided on page IV.F-31 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR and this comment quotes directly from the Draft EIR’s analysis of the potential to encounter USTs later in the section. Refer to pages IV.F-44 and IV.F-45 of the Draft EIR and Response to Comment No. 13-6 regarding the former USTs identified on-site. The removal of USTs is a matter of regulatory compliance, and the Draft EIR correctly concluded that with compliance with applicable regulations and requirements, impacts related to USTs would be less than significant. The requested details of the geophysical investigation do not affect the analysis or conclusion in any way because even if a known UST was present on the Project Site, its removal would still be a matter of regulatory compliance and the conclusion would not change. A summary of regulatory measures related to hazards and hazardous materials, including those pertaining to USTs, that are applicable to the Project is provided in Appendix FEIR-11 of this Final EIR.

Comment No. 26-E.1-75

59. Section [sic] **IV.F.3.d(b)(1)(a)(vi) (pgs. 46–47 of pdf)** relates to methane gas and identifies it as “potentially significant,” which will be mitigated by Mitigation Measure HAZ-MM-2(p. 53), which includes controls to mitigate the effects of subsurface gases and impacted soil and groundwater on workers and the public, including:
- a. “Monitoring devices for methane and benzene shall be present to alert workers of elevated gas concentrations when basement or subsurface soil disturbing work is being performed.” Additional detail regarding what plans will specify monitoring equipment, number of monitors based on size of excavation, plans for monitoring for potential emissions to nearby workers or residents, action levels, frequency of observation, etc. should be provided.
 - b. “Contingency procedures will be in place if elevated gas concentrations are detected such as the mandatory use of PPE, evacuating the area, and/or increasing ventilation within the immediate work area where elevated concentrations are detected.” Similarly, specify what plans will the contingency procedures be identified in. Specify if the General Contractor will be responsible for preparation of an overall HASP that addresses these

procedures. Specify what procedures will be in place to confirm that consistent procedures are used by all contractors.

- c. "Workers shall be trained to identify exposure symptoms and implement alarm response actions." Related to the contingency procedures above, specify the symptoms and who will be responsible for providing training.
- d. "Soil and groundwater exposed during excavations shall be minimized to reduce the surface area which could off-gas. This shall be achieved by staggering exposed excavation areas." Provide details regarding what an acceptable area of excavation will be and what the assumed time for off-gassing is.
- e. "Soil removed as part of construction shall be sampled and tested for off-site disposal in a timely manner. If soil is stockpiled prior to disposal, it shall be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP)." The SMP indicates that areas with chemicals of concern above screening levels will be excavated prior to site-wide excavation and stockpiled on-site; it is not clear if this is in accordance with the SWPPP. The stockpiles will only be covered if left on-site for greater than 48 hours. Given the adjoining residential and commercial properties, stronger mitigation should be included (e.g., covering all stockpiles with chemicals of concern unless actively adding to the stockpile or loading for off-haul).
- f. "Fencing shall be erected to limit public access and allow for gas dilution." It is not clear how fencing allows for gas dilution. State what the minimum required setbacks will be (i.e., how far away do members of the public need to be and is that feasible).

A discussion of public protection/notification measures, particularly for adjoining properties, should be included.

Response to Comment No. 26-E.1-75

As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, Mitigation Measure HAZ-MM-2 requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public. Implementation of Mitigation Measure HAZ MM-2 would ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater would be less than significant.

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding hydrocarbons and the Project Site's location within an oil field. Refer to Response to Comment No. 26-38 regarding applicable SCAQMD rules and regulations.

Mitigation Measure HAZ-MM-1 specifically requires the General Contractor to comply with the monitoring, notification and reporting requirements of SCAQMD Rule 1166, which includes notification to adjoining properties. Mitigation Measure HAZ-MM-2 states that, among other mitigation measures, air monitoring to detect any elevated levels of volatile organic compounds will be performed. Both Rule 1166 and the California Construction Safety Orders set forth acceptable levels of constituents of concern. The HASP is prepared in accordance with California Code of Regulations, Title 8, Section 5192 for the safety of the workers, as explained in the DEIR.

Contingency procedures will be specified in the HASP that will be prepared by the General Contractor. The HASP will specify training for identifying conditions that would require a contingency response. The contingency procedures detailed in the HASP will include procedures to confirm that consistent contingency procedures are used by all contractors.

Comment No. 26-E.1-76

AESTHETICS, AGRICULTURE, MINERAL RESOURCES, POPULATION AND HOUSING, RECREATION, AND WILDFIRE

60. Aesthetic issues were dismissed in the Initial Study primarily on the grounds that the new and altered buildings and other improvements would be consistent with the character of the neighbourhood [sic] and would not introduce substantial new sources of lighting or glare. The IS analysis did not consider the possibility that new buildings up to 225 high (proposed to be constructed on either side of the primary studio building) would shade areas of adjacent properties, such as the parcel on which the historic Gilmore Adobe stands. Ramboll suggests that the DEIR evaluate the shade and shadow impacts of the Project given the height of the buildings could create impacts on the adjacent residential and commercial areas.

Response to Comment No. 26-E.1-76

As explained in the Initial Study (included in Appendix A of the Draft EIR) and in Section VI, Other CEQA Considerations, of the Draft EIR, SB 743 [Public Resources Code (PRC) Section 21099(d)] sets forth the following: "Aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment."

Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing “major transit stop.” Specifically, a number of bus lines provide transit service throughout the Project area, with bus stops located adjacent to the Project Site on both Beverly Boulevard and Fairfax Avenue, as well as within a one-block radius; these include Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 14, 16, 17, 217, 218, 316, and 780, several of which have headways of 15 minutes or less during the morning and afternoon peak commute periods; and LADOT DASH Fairfax Line. In addition, Metro transit facilities planned in the area include the Metro D (Purple) Line extension. The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a TPA, as defined in ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts are not considered to be significant impacts on the environment and therefore do not require further evaluation under CEQA. However, an analysis of the Project’s potential aesthetics impacts is included in the Initial Study for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. The analysis therein concludes that in the absence of SB 743, aesthetic impacts of the Project would be less than significant. Nonetheless, with regard to shading and shadows, note that the Gilmore Adobe would be located approximately 167 feet from the nearest Project buildings. Given the location of the Project Site to the north of the Gilmore Adobe and the angle of the sun, shadows from Project buildings would generally extend to the north, not to the south towards the Gilmore Adobe.

Comment No. 26-E.1-77

CLOSING

We appreciate the opportunity to perform this review. Please feel free to call Eric Lu at (949) 798-3650 if you have any comments or questions.

Response to Comment No. 26-E.1-77

This comment, which concludes the letter and provides a point of contact, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision makers prior to any action on the Project.

Comment No. 26-E.1-78

Attachments:

Figures [4 pages]

Attachment A—Ramboll tables and worksheets [8 pages]

Response to Comment No. 26-E.1-78

This comment provides a list of attachments, as well as tables and worksheets. These materials were reviewed and responded to as appropriate in connection with the response to comments above.

Comment No. 26-E.2-1**Exhibit 2—Statistical Research, Inc. letter**

Statistical Research, Inc. (SRI), has reviewed portions of the Draft Environmental Impact Report (DEIR) and supporting technical appendices for the TVC 2050 Project (Project) located at 7716– 7860 West Beverly Boulevard, Los Angeles, California (Project Site).

DEIR sections reviewed include:

- Section II Project Description
- Section IV Environmental Impact Analysis
- B. Cultural Resources
 - D. Geology and Soils
 - H. Land Use and Planning
 - L. Tribal Cultural Resources

Technical appendices reviewed include:

- Appendix C.1: Historical Resources Technical Report
- Appendix C.2: Tribal Cultural Resources Report
- Appendix C.3: AB 52 Notification Letter and Delivery Confirmations

- Appendix C.4: Historic Signage Guidance
- Appendix F: Paleontological Resources Review Memorandum

Overall, SRI concludes that all reviewed sections of the DEIR and technical appendices fail to adequately identify and analyze the effects of the TVC 2050 Project on cultural resources (historic built environment and archaeological resources), tribal cultural resources, and paleontological resources. Glaring errors, omissions, and organizational problems are apparent in each of these sections and technical appendices. These deficiencies make the overall DEIR inadequate as a disclosure document as required by the California Environmental Quality Act (CEQA) and in some respects make it impossible to adequately review. Deficiencies of the DEIR and technical appendices are summarized below and further explained in the attached Table 1.

Response to Comment No. 26-E.2-1

The issues raised by the commenter are addressed in Response to Comment Nos. 26-E.2-2 through 26-E.2-153, below. As demonstrated therein, the analysis in the Draft EIR meets the requirements of CEQA.

Comment No. 26-E.2-2

Historic Built Environment

Material Impairment of Existing Historical Resources. It is difficult to assess the potential impacts of the Project as the proposed development is undefined. The central element of the Project is described as the TVC 2050 Specific Plan (Specific Plan), but the Specific Plan was not provided with the DEIR. The DEIR includes a Conceptual Site Plan in Figure II-4 of the DEIR, but the DEIR states this is only one possible development scenario and is simply “illustrative.”

In any event, the development of the Project in accordance with the Conceptual Site Plan, as well as the Height Zone Map in Figure II-5 of the DEIR and Proposed Development Program in Table II-2 of the DEIR, would materially impair the historic significance of the Primary Studio Complex because (1) 58-foot-tall buildings could be constructed to the north of the Primary Studio Complex; (2) it appears that a substantial portion of the Service Building (one of the two buildings, along with the Studio Building, that comprise the Primary Studio Complex) would be removed, as well as a portion of the Studio Building; (3) the 1969 Mill Addition and the 1976 Support Building (collectively, Additions), which are the two existing additions to the Primary Studio Complex, would be demolished; (4) the development of the Project would otherwise significantly impair the integrity of the Primary Studio Complex with respect to setting, feeling, and association; and (5) the DEIR improperly defers environmental review of what would actually be constructed in proximity

to the Primary Studio Complex, as well as preparation of a historic structure report that is critically needed here to guide the rehabilitation of the existing historical resources on the Project Site. Each of these significant concerns is addressed below.

Response to Comment No. 26-E.2-2

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 26-119, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. A draft Specific Plan is not necessary for evaluation of the Project. Please note that the Preliminary Draft Specific Plan includes the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. The Preliminary Draft Specific Plan has been made publicly available for informational purposes prior to the release of this Final EIR on the Department of City Planning's website. Please note that this draft is not final and has not been approved by City decision-makers.

Refer to Topical Response No. 5, Historical Resources, specifically Section C, Potential New Construction North of the Primary Studio Complex, regarding the impact analysis of new construction in the Viewshed Restoration Area; Section A, Existing Evaluation and Designation of the Primary Studio Complex, regarding the HCM designation and how the 1969 Mill Addition and 1976 Support Building are not a part of the designation; and Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, regarding preparation of the HSR. Refer to Response to Comment No. 26-46 regarding the removal of the southern portion of the Service Building and how the volume of the Studio Building would be restored.

An analysis of the Project's potential impacts on the integrity of the Primary Studio Complex is included on pages IV.B-54 to IV.B-55 of the Draft EIR and pages 76 to 81 of the Historic Report (Appendix C.1 of the Draft EIR). As discussed in detail in the Historic Report, after the Project is constructed, the Primary Studio Complex would retain most of the aspects of integrity, including location, design, materials, workmanship and association. Integrity of setting has been lost over time prior to this Project, and integrity of feeling would be compromised by the Project. However, because integrity of location, design, materials,

workmanship, and association would be retained, the Primary Studio Complex would still be able to convey its overall historic character, appearance, and association with its historical period when it became the first large-scale, purpose-built television facility. Moreover, with Project Design Feature CUL-PDF-2, the Project would include an HSR to guide the rehabilitation of the Primary Studio Complex in compliance with the Rehabilitation Standards, which would support the preservation of the Primary Studio Complex and maintain its integrity. Mitigation is not required as compliance with the Rehabilitation Standards would be ensured by OHR, who would review the construction documents prior to approving the building permits pursuant to the Cultural Heritage Ordinance and the Specific Plan. After construction of the Project, the Primary Studio Complex would retain sufficient integrity to convey its significance. As such, the Primary Studio Complex would not be materially impaired by the Project because the Primary Studio Complex would remain eligible for designation as an HCM and for listing in the National Register and the California Register. Thus, the Project would not result in a substantial adverse change in the significance of the Primary Studio Complex, and impacts would be less than significant. Contrary to this comment, the Draft EIR did not defer review of development in proximity to the Primary Studio Complex.

Comment No. 26-E.2-3

First, the casual reader of the DEIR would assume that almost no above-grade new construction would occur to the north of the Primary Studio Complex. For example, the Conceptual Site Plan includes mainly landscaping, open space, and parking to the north of the Primary Studio Complex. The Conceptual Site Plan, however, is just one of a limitless number of development options, and, in fact, new buildings are allowed in this area. On the Height Zone Map in Figure II-5 of the DEIR, the substantial area between Beverly Boulevard and the Primary Studio Complex is designated as “Height Zone A—Viewshed Restoration Area.” We understand that the applicant negotiated with the Los Angeles Conservancy for certain restrictions that would preserve in part the view of the Primary Studio Complex from Beverly Boulevard. Specifically, the Cultural Heritage Commission’s discussion of findings in support of a Historic-Cultural Monument designation for the Primary Studio Complex (see Appendix C: Adopted HCM Designation in the Historic Resources Group technical report for the TVC 2050 Project [Appendix C.1 of the DEIR]) lists the *future* exterior viewshed features as seen from adjacent public right-of-way along Beverly Boulevard. These include the central entryway bridge, signage on the central entryway bridge, the view of the intersection between the western portion of the Service Building and Studio Building, and the signage at the western corner of the Service Building. Regarding the restoration of the historic viewshed from Beverly Boulevard, the Commission wrote: “It is expressly understood that in order to achieve meaningful views, any future development within this Future Viewshed Restoration Area should not reduce views of the enumerated Exterior Viewshed Features to mere slivers or glimpses.” However, Height Zone A does not accomplish “viewshed restoration” because buildings up to 58 feet in height are permitted in Height Zone A. If the goal here is actually to preserve historic views

from Beverly Boulevard, why are one or more six-story buildings allowed directly north of the Primary Studio Complex?

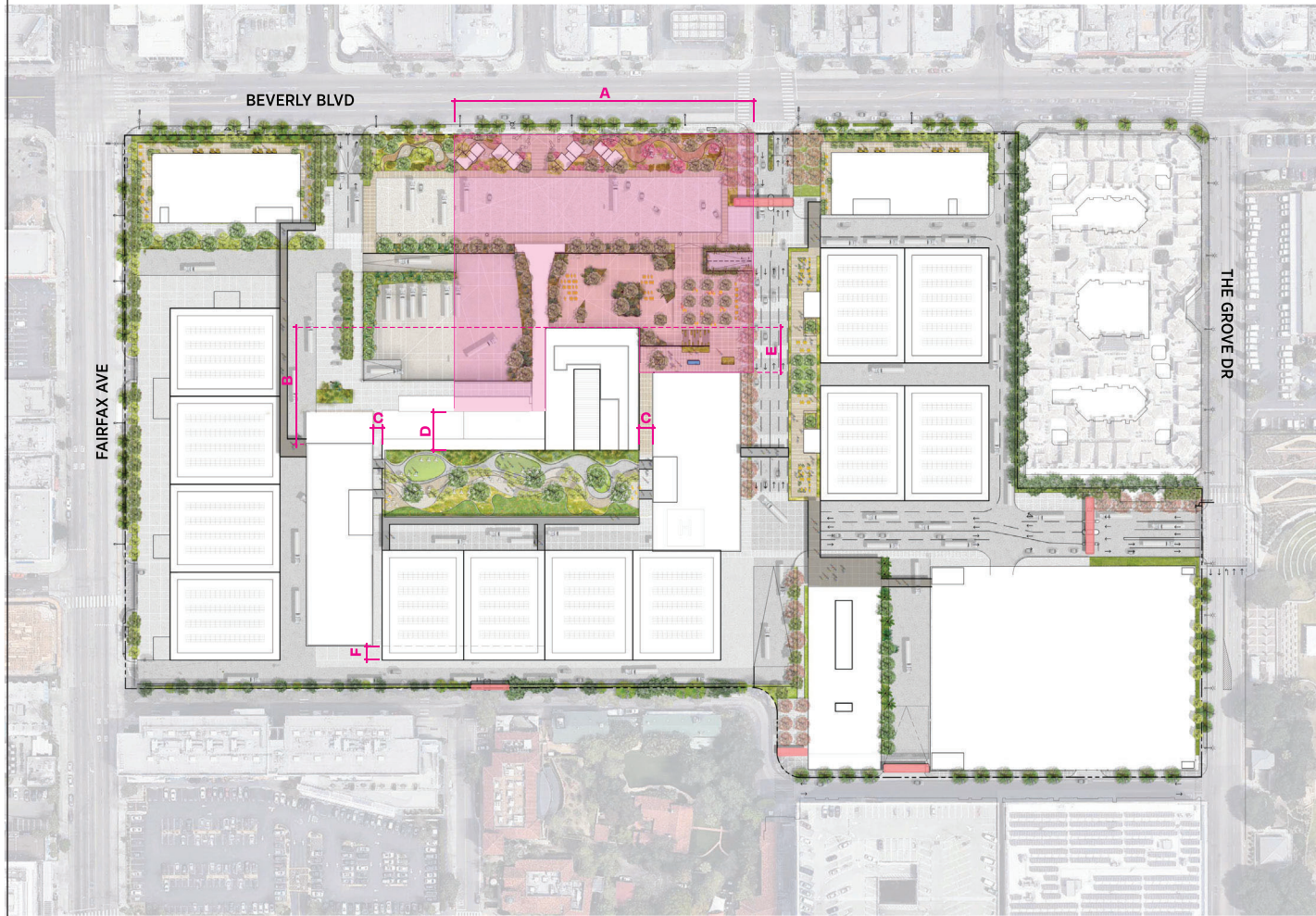
In this regard, we note that one of the items in Project Design Feature CUL-PDF-1 states that “new buildings immediately adjacent to the Primary Studio Complex [should be located] to the east and south of the Service Building and to the west of the Studio Building.” This implies that new buildings could not be constructed immediately north of the Primary Studio Complex, but it does not expressly prohibit such construction. Moreover, the most charitable reading of this provision is that it would preclude new construction to the north that was “immediately adjacent” to the Primary Studio Complex. This would not preclude a new building 5 feet, or 10 feet, or 20 feet from the Primary Studio Complex.

Response to Comment No. 26-E.2-3

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the preservation of the Primary Studio Complex. As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. As discussed in Section B, Historic Structure Report and Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.


For additional information regarding the agreement with the Los Angeles Conservancy, refer to Response to Comment No. 26-19.

Project Design Feature CUL-PDF-1 (i.e., the Project Parameters) establishes maximum permitted development areas, heights limits and setback requirements for adjacent new buildings and additions to the Primary Studio Complex, as well as massing limitations to ensure that the Primary Studio Complex is not adversely affected. As discussed on page IV.B-52 of the Draft EIR, the Conceptual Site Plan is consistent with the Project Parameters set forth under Project Design Feature CUL-PDF-1 (refer to Figure II-10 on page II-957), and Project Design Feature CUL-PDF-1 would apply to any development scenario permitted under the proposed Specific Plan.



LEGEND

- A** 430' width of Viewshed Restoration Area as defined in HCM designation (CHC-2018-476-HCM)
- B** 150' set back from north facade of Service Building
- C** 15' separation from east facade of Service Building and 10' separation from west facade of Studio Building
- D** 55' set back of rooftop addition from north facade of Studio Building
- E** 60' set back from north facade of Service Building
- F** 20' extension of south facade of Studio Building

 Viewshed Restoration Area

NOTE:

- This figure depicts the Conceptual Site Plan's compliance with the Project Parameters (Project Design Feature CUL-PDF-1) set forth on pages IV.B-38 to IV.B-40 of the Draft EIR.

Figure II-10
Proposed Historic Project Parameters

Comment No. 26-E.2-4

Second, contrary to the DEIR and underlying Historic Resources Technical Report (Historic Report) for the Project, it is likely that both of the Additions are historical resources. The DEIR and Historic Report attempt to disqualify the Additions as historical resources by artificially limiting the period of significance to 1952–1963 and then concluding that the Additions are not historical resources because they were constructed in 1969 and 1976 (i.e., after 1963). The sole justification offered for using 1952–1963 as the period of significance is that the Primary Studio Complex was constructed in 1952, and, in 1963, “CBS abandoned its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City.” (DEIR, IV.B-24; Historic Report, p. 34)

However, the period of significance for the Project Site obviously did not end in 1963. “Period of significance” refers to the dates when a property achieved the historic significance necessary to qualify for listing in the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). Therefore, the period of significance for the television studio on the Project Site is the span of time when the property actively contributed to the growth and popularity of commercial television. That period did not end in 1963. To the contrary, CBS was just getting started. As discussed in more detail in Table 1, and as recognized in the Historic Report, a variety of groundbreaking and innovative television shows were shot there with live studio audiences throughout the 1960s and 1970s, including *The Smothers Brothers Comedy Hour* (1967–1970), *All in The Family* (1971–1979), *Maude* (1972–1978) and *The Carol Burnett Show* (1967–1978). Any assessment of the historic significance of CBS’s television programming cannot credibly omit these and other television shows that became part of the nation’s shared cultural experience during these two decades.

The brief discussion of the period of significance in the DEIR and Historic Report actually undercuts the artificially shortened period. They state that, during the 1952–1953 period, television use was growing rapidly, and networks expanded their operations and facilities nationwide, as evidenced by the development of Television City. They also claim that 1952–1963 “captured the postwar evolution of CBS and with the construction of Television City” and “represents the maturation of commercial television.” But none of this was less true in 1979 than it was in 1963. CBS continued to grow and increase its domination of American television throughout the 1960s and 1970s, and most would say that the 1970s represented the “maturation of commercial television” to a considerably greater extent than the 1952–1963 period. CBS’s construction of the Additions in 1969 and 1976 reflected its continuing need to expand its television production facilities.

Furthermore, there is an inexplicable disconnect between the stated reason for ending the period of significance and the evidence cited to support it. The stated reason is that in

1963, CBS decided to move filmed programming to Studio City. But the subsequent discussion focuses entirely on the expansion of television programming, not on moving filming to Studio City. This disconnect arises because the reliance on a decision to abandon a unified facility is an artificial construct that has no bearing on the making of some of CBS's most historically significant television shows throughout the 1960s and 1970s. In other words, the period of significance cannot be based on what did not happen at Television City, but what *did* happen there.

In consideration of these associative values, the period of significance of the CBS television studio certainly ended no earlier than 1979. In addition, sufficient time has passed to provide a scholarly perspective on the potential historical significance of the 1969 Mill Addition and the 1976 Support Building addition. We note that Gin Wong, who coordinated the architectural design and construction of the Primary Studio Complex for Pereira and Luckman, also designed the Additions and is a master architect. Given that the Additions were summarily excluded from consideration as historical resources based solely on the artificially limited 1952–1963 period of significance, the Additions must be reevaluated under the more appropriate period of significance of 1952–1979 to determine if, as we think likely, they are historical resources that augment the overall historical significance of the Primary Studio Complex.

Response to Comment No. 26-E.2-4

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 19-12, 26-41, and 26-E.2-82 regarding the period of significance determined for Television City and the Draft EIR's discussion of Gin Wong. As discussed therein, the assertion that the period of significance must be expanded to accommodate years of additional television production incorrectly conflates continued use with historic significance. Furthermore, the suggested end date of 1979 has no apparent meaning and appears to be randomly selected. The claim that the period of significance should extend to "at least" 1979 is also contrary to NPS guidance for another reason. That guidance states that "[f]ifty years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period." Thus, if the 2018 HCM Findings had determined that the period of significance concluded at 50 years, the end date for the period of significance would have been 1968, meaning the 1969 Mill Addition and the 1976 Support Building would still have been excluded.

With regard to Gin Wong, the commenter expresses a fundamental misunderstanding of the significance criteria for association with a master architect. NPS guidance states that not every property designed by a master architect is necessarily significant. To be eligible, the property "must express a particular phase in the development of the master's career,

an aspect of his or her work, or a particular idea or theme in his or her work.”¹⁰¹ For the record, the 1969 Mill Addition was designed by Pereira and Luckman, while Wong was the project coordinator. The 1976 Support Building and 1992 East Studio Building were designed by Gin Wong Associates. There is no evidence provided by the commenter that 1976 Support Building and 1992 East Studio Building represent an architectural achievement or played an important role in Wong’s career.

The HCM Findings, as well as the supporting documents, were consistent with industry standards and arrived at the appropriate conclusions with regard to the period of significance and contributions of Wong. Therefore, the Primary Studio Complex does not require re-evaluation.

Comment No. 26-E.2-5

Third, the DEIR and Historic Report downplay or ignore the Project’s overall impact on the integrity of the existing resources. As discussed in the DEIR, integrity is the ability of a historical resource to convey its historic significance. The seven aspects of integrity are location, setting, design, materials, workmanship, feeling, and association.

To start with, as previously discussed, it is likely that the Additions do in fact qualify as historical resources and augment the overall historic and architectural significance of the Primary Studio Complex. If so, their proposed demolition alone would materially impair the overall historical resource with respect to all aspects of integrity and result in a significant historical resources impact.

In addition, as stated in the DEIR (p. IV.B-42), the Project includes the demolition of the southern portion of the Service Building, which would “alter the building’s overall form and volume.” The DEIR claims that this acknowledged loss “would be counterbalanced by the removal of the 1976 Support Building,” but that bootstraps off its claim that the 1976 Support Building addition is not a historical resource, when the opposite is likely true. In addition, the applicant apparently intends to remove up to two bays of the Studio Building’s west wall. (DEIR, p. IV.B-38) These substantial losses would further compromise the integrity of the overall historical resource by detracting from the overall form, massing, and configuration of the Primary Studio Complex, which are important character-defining features as identified in the Cultural Heritage Commission’s support of a Historic-Cultural Monument designation for the property.

¹⁰¹ Patrick Andrus and Rebecca Shrimpton, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: U.S. Department of the Interior, 1997), 20.

Furthermore, with the broad flexibility afforded by the Specific Plan, the Primary Studio Complex could be encircled in all three dimensions by new buildings and structures. As previously discussed, the developer could construct one or more new buildings up to 58 feet in height directly north of the Primary Studio Complex. In addition, most of the area to the west, east, and south of the Primary Studio Complex is in Height Zone D, which has a base height limit of 88 feet, but allows a maximum of 225 feet over 40 percent of the Project Site. In fact, the DEIR states (p. IV.B-50) that the Project “would” include two new buildings to the east and west of the Primary Studio Complex (referred to in the DEIR as the “East Building” and the “West Building”) that “would have potential heights of 225 feet,” but “would also be constructed as distinct volumes, physically separated from the Primary Studio Complex by a minimum of 15 feet on the east and 10 feet on the west.” The Conceptual Site Plan also shows new buildings to the south of the Primary Studio Complex, which apparently would consist of an office building and sound stages.

To complete the three-dimensional picture, new construction would also be permitted on top of the Primary Studio Complex. According to the Height Zone Map and related text in the DEIR (pp. II-18–20), Height Zone E is a rooftop zone that would apparently allow a rooftop addition of up to 36 feet above the existing parapet of the Studio Building for a length of approximately 350 feet. In addition, Height Zone F is a rooftop zone that would apparently permit a variety of non-occupiable structures on top of the Primary Studio Complex north of Height Zone E.

So, even if construction proceeded in accordance with the Conceptual Site Plan, it would not be the case, as the DEIR claims (p. IV.B-52) that “the architectural features [of the Primary Studio Complex] would remain visible.” To the contrary, this new construction would envelop the Primary Studio Complex and result in a significant loss of integrity with respect to setting, feeling, and association.

At present, the setting of the television studio includes the relationships of surrounding features, reflects the designer’s intent, and indicates function. The new development envisioned in the Conceptual Site Plan would diminish integrity of setting by changing dramatically the existing physical environment and character of place by surrounding the Primary Studio Complex both horizontally and vertically with new construction.

Response to Comment No. 26-E.2-5

The integrity of the Primary Studio Complex after implementation of the Project was thoroughly analyzed in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), and it was determined that the Primary Studio Complex would retain sufficient integrity to convey its historic significance. Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for further information. The 1969 Mill Addition and 1976 Support

Building were not identified as eligible for historic listing and were not included in the HCM Findings or designation. As such, the removal of the two additions would not result in a loss of integrity to the Primary Studio Complex; rather, the removal of these additions would restore the integrity of the Primary Studio Complex. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the HCM nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the 1976 Support Building and any other buildings and structures constructed after 1963 were not included in the designation. Furthermore, in preparing the Historic Report, HRG reviewed all of the relevant materials for consistency with best practices and concluded the period of significance was appropriate.

Refer to Response to Comment No. 26-46 regarding the analysis of impacts from demolition of the southern portion of the Service Building. In reference to concerns regarding potential new construction north of the Primary Studio Complex, any new construction would be limited by the HCM Findings and the Cultural Heritage Ordinance, notwithstanding the 58-foot height limit in Height Zone A, which is taken directly from the HCM Findings. Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for more information.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Draft EIR's analysis of Project and the regulatory framework under the proposed Specific Plan for implementation of the Project.

Comment No. 26-E.2-6

The immediate physical context of the Primary Studio Complex is its setting, and the surrounding area is defined as viewshed. Viewsheds are intended to provide a buffer zone to exclude intrusions that negatively impact the setting of historical resources. An intrusion is anything that negatively impacts a historical resource, either by blocking a view or by modifying a defining characteristic by the imposition or insertion of non-historic material. Buildings or structures of inappropriate scale are intrusions. For example, the proposed height limit of 58 feet in Height Zone A, confusingly named the Viewshed Restoration Area, would have the consequence of positioning one or more intrusive structures on the axis between Beverly Boulevard and the north facade of the Primary Studio Complex. New construction in Height Zone A would undoubtedly cause major visual intrusions and interrupt the continuity of the historic setting. The same is true with respect to the development of large buildings on all other sides of the Primary Studio Complex and substantial new buildings and structures above it.

Feeling refers to the expression of a historic sense or a conveyance of historic character. The new development allowed in Height Zones C (160-foot maximum height) and D (225-foot maximum height) would dwarf the Primary Studio Complex and substantially impair the original relationship with neighboring buildings and structures, thereby impairing integrity of feeling.

Association refers to the link between an important event or trend and a resource, wherein the resource conveys that relationship. Like setting, integrity of association would be impaired through additions and subtractions to the Primary Studio Complex and surrounding new development by altering the essential physical features that conveyed its appearance during the period of significance.

Having said all this, it is not the case, as the DEIR repeatedly suggests, by using the word “would,” that the Project would proceed in accordance with Conceptual Site Plan. While development would apparently be subject to the restrictions in the Height Zone Map, the actual development could be even more impactful to integrity of setting, feeling, and association than the Conceptual Site Plan, which is an illustrative scenario. As previously discussed, while the Conceptual Site Plan includes mainly landscaping, open space, and parking to the north of the Primary Studio Complex, the developer could choose to construct buildings there as tall as the Primary Studio Complex.

Response to Comment No. 26-E.2-6

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding construction within the Viewshed Restoration Area. Also refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5 regarding integrity of *feeling*, *setting*, and *association*, and how the Primary Studio Complex would retain most of the aspects of integrity after implementation of the Project. As discussed therein and on pages IV.B-52 to IV.B-54 in Section IV.B, Cultural Resources, of the Draft EIR, the changes to the immediate surroundings of the Primary Studio Complex over time have altered the immediate on-site surroundings such that the immediate setting no longer contributes to the historic significance or integrity of the Primary Studio Complex as noted in the 2018 Historic Resource Assessment. The Project involves new construction in areas that have already been altered since the period of significance.

In addition, as discussed on pages IV.B-51 to IV.B-52 in Section IV.B, Cultural Resources, of the Draft EIR, the Project would include the construction of the “East Building” and “West Building” (refer to Figure II-4(a), Aerial Rendering of Conceptual Site Plan—View South, of Section III, Revisions, Clarifications, and Corrections to the Draft EIR). Both buildings are located in Height Zone D and would have potential heights of up to 225 feet above Project Grade (i.e., approximately 201 feet above mean sea level). Both

the East Building and West Building would also be constructed as distinct volumes, physically separated from the Primary Studio Complex by a minimum of 15 feet on the east and 10 feet on the west. Small bridges would provide pedestrian access from the East and West Buildings to the Primary Studio Complex and any rooftop addition. Any portion of the East Building rising higher than the height of the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 60 feet. This setback/height limitation of the East Building would allow the full articulation of the Service Building's three-story office portion and its steel frame and glass curtain walls to be revealed when viewed from the northeast. Similarly, any portion of the West Building rising higher than the Service Building would be set back southerly from the north façade of the Service Building by a minimum of approximately 150 feet. This would allow the currently obstructed west wall of the Studio Building, which would be restored by the Project, to become fully visible. The simple, rectangular massing of the East Building and West Building (in conjunction with any rooftop addition) would provide a deferential backdrop to the Primary Studio Complex in order to be compatible with the Primary Studio Complex. An axon diagram of the Conceptual Site Plan is included on page 45 in the Applicant's presentation included in Exhibit 6 of this comment letter (Comment Letter No. 26).

Overall, the bulk and mass of the East Building and West Building would be concentrated towards the south, away from the primary (north) façade of the Primary Studio Complex, thereby ensuring that the Primary Studio Complex retains its visual prominence. Ultimately, construction of the East Building and West Building would not destroy any of the important historic materials or features that characterize the Primary Studio Complex. After Project buildout, the distinctive form and design of the Primary Studio Complex would remain intact, and its architectural features would remain visible. For these reasons, construction of the East Building and the West Building would not materially alter in an adverse manner the physical characteristics that convey the historical significance of the Primary Studio Complex. Thus, impacts from new construction adjacent to the Primary Studio Complex would be less than significant.

As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. The Conceptual Site Plan shown in Figure II-4 in Section II, Project Description, of the Draft EIR is consistent with the Project Parameters set forth under Project Design Feature CUL-PDF-1 (refer to Figure II-10 on page II-957 associated with Response to Comment No. 26-E.2-3, above), and Project Design Feature CUL-PDF-1 would apply to any development scenario permitted under the Specific Plan. Project

Design Feature CUL-PDF-1 includes maximum permitted development areas, setbacks and heights for adjacent new buildings and additions to the Primary Studio Complex, as well as massing limitations to ensure that the Primary Studio Complex is not adversely affected.

Furthermore, as discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Project would comply with Section 22.171.14 of the Cultural Heritage Ordinance. Pursuant to the Cultural Heritage Ordinance, building permits for substantial alterations to a historical resource may only be issued after OHR has confirmed that the plans comply with the Rehabilitation Standards. For these reasons, the Project would not result in a substantial adverse change in the significance of the Primary Studio Complex by altering its immediate surroundings. Thus, impacts to the Primary Studio Complex from Project buildout would be less than significant.

With regard to the comment about the use of “will” versus “would,” note that the City typically uses the term “would” when discussing a project in its environmental documents to reflect the fact that the project has not been approved by the decision-maker.

Comment No. 26-E.2-7

Inadequate Mitigation to Protect Historic Resources. The historic resource analysis in the DEIR includes Project Design Feature CUL-PDF-2 (DEIR, p. IV.H-20), which requires the preparation of a Historic Structure Report (HSR) after the entitlements for the Project have been approved. However, in the absence of an HSR that is prepared now with comprehensive existing conditions information, the public and decisionmakers cannot understand how the proposed rehabilitation of the Primary Studio Complex would impact the historic fabric and overall character of the historical resource. One purpose of an HSR is to provide a forum to address changes to a property during the planning phase to minimize adverse effects to the character-defining features of the historic resource, either materially or visually. An HSR should inform the development of mitigation measures and parameters. However, the applicant plans to remove the Additions, two bays of the Studio Building, the southern portion of the Service Building, and other elements of the Primary Studio Complex. (DEIR, pp. IV.H-38–39) A detailed HSR should be required as part of the DEIR to clarify what mitigation measures are necessary. Preparation of the HSR should follow the National Park Service’s *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, which provides guidance on how to document—textually and graphically—the physical history and existing condition of a property. The need for a HSR as part of the DEIR is particularly important because the Project has an undefined development plan. The Conceptual Site Plan is not a reflection of what might actually be developed. Without an HSR, the DEIR’s analysis and conclusions regarding the Project’s potential impacts on historical resources is unsupported.

Response to Comment No. 26-E.2-7

The assertion regarding inadequate mitigation is incorrect and is not consistent with the City of Los Angeles regulations for the treatment of designated HCMs as well as the standard purpose and use of an HSR. Refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding Project Design Feature CUL-PDF-2 and implementation timing of the HSR.

Comment No. 26-E.2-8

Impacts on Surrounding Historical Resources. The DEIR and underlying Historic Report minimally address existing and potential visual conditions and scenic integrity. Although the DEIR focuses on retaining the visual prominence of the north facade of the Primary Studio Complex (i.e., the view to the building from Beverly Boulevard), there is no consideration of the Project's adverse visual effects on surrounding historic properties resulting from new construction. (*Note:* The surrounding historic properties include the Original Farmers Market, Rancho La Brea Adobe, Chase Bank, Fairfax Theater, Air Raid Siren No. 25, Beverly Fairfax Historic District, and the Miracle Mile North Historic Preservation Overlay Zone.) An in-depth visual-resource, or viewshed, analysis study is needed for that purpose. This study should document existing visual conditions to, from, and within the Project Site, and evaluate, as the DEIR and Historic Report have not, scenic integrity, visual quality, and viewer sensitivity regarding the existing landscape/streetscape characteristics.

It seems apparent that the development of the Project in accordance with the Height Zone Map in Figure II-5 of the DEIR and Proposed Development Program in Table II-2 of the DEIR would materially and/or visually impair the historic significance of the Rancho La Brea Adobe (HCM 543) and Original Farmers Market (HCM 543) just south of the Project Site. Considering the heights of proposed new construction in Height Zones B, C, and D (between 130 and 225 feet above "Project Grade," which is already up 15 feet above existing grade adjacent to the Adobe), any interruption of the existing horizon line would have an obstructive effect on the historic properties by altering the character, setting, feeling, and viewshed that make them eligible for listing in the NRHP and/or CRHR. Furthermore, the Project would have a demonstrably negative aesthetic effect (i.e., an effect that diminishes the character or quality of the historic property) by introducing buildings, signage, and nighttime lighting that are incompatible, out of scale and proportion, and/or out of character with the Adobe and Farmers Market.

Response to Comment No. 26-E.2-8

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, impacts to aesthetics are

based on different criteria and thresholds than those used for historical resources. This comment incorrectly conflates the two. As set forth in Appendix G of the CEQA Guidelines and in the Initial Study for the Project included as Appendix A of the Draft EIR, aesthetic impacts under CEQA include the consideration of: scenic vistas; scenic resources, including historical resources, within a scenic highway; for urban projects, consistency of the project with applicable regulations regarding scenic quality; and light and glare. Thus, the analysis of aesthetics considers the experiences of people who may view a scenic resource, while the analysis of historic impacts considers whether a project would adversely affect the integrity of an historical resource.

As described in Section 4.I on pages 30 to 31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on a developed site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact,” unless evaluation is required under other land use regulations in the LAMC. An evaluation of aesthetic impacts is not required under the LAMC. As such, no further analysis was required in the Draft EIR for this topic. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The Draft EIR fully and adequately analyzed potential impacts to historical resources in the Project Site vicinity based upon the thresholds in Appendix G of the CEQA Guidelines. Potential impacts to The Original Farmers Market and the Gilmore Adobe are specifically addressed on page IV.B-55 of Section IV.B, Cultural Resources, of the Draft EIR. This comment does not provide any explanation as to what aspects of the immediate surroundings are instrumental in conveying the historic significance of any of the nearby historical resources or how changes to the urban landscape would diminish the integrity of the nearby historical resources, and no attempt is made to explain how the character, setting, feeling, and viewshed would be altered, or how these attributes make the resources in the vicinity of the Project Site eligible for historic listing.¹⁰² Indeed, the immediate surroundings of all the nearby historical resources have been subject to continual change and alteration over time as is typical of urban environments. As such, the physical aspects of these resources that are critical to conveying their historic significance are largely contained to their respective properties. No alteration to a hypothetical

¹⁰² U.S. Department of the Interior, National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, (Washington, DC: 1990; revised for Internet, 2002), www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, accessed October 13, 2023.

“viewshed” or the larger setting of these resources would diminish their integrity such that their eligibility for historic listing is threatened.

Comment No. 26-E.2-9

Relatedly, ground-borne vibrations from construction-related activities could adversely affect the structural integrity of the Rancho La Brea Adobe. This historical resource is constructed of unreinforced masonry and has characteristics—such as the compressive strength of the adobe blocks and cracking and settlement issues—which apparently have not been investigated. Consequently, we question the accuracy of the construction-vibration impact assessment of the adobe building as presented in Table IV.I-20 of the DEIR. Because this historical resource is located within 130 feet of the Project Site, a preconstruction survey of the building should be performed by a structural engineer who specializes in adobe architecture to identify structural and seismic deficiencies that may be worsened by ground-borne vibration during construction. Additionally, the applicant should develop a vibration management and monitoring plan to ensure against damage caused by vibration or differential settlement caused by vibration during construction and operation activities.

Response to Comment No. 26-E.2-9

Refer to Response to Comment No. 26-139 for a discussion of the Gilmore Adobe. As discussed therein, impacts would be less than significant.

Comment No. 26-E.2-10

Located to the north of the Project Site is the Beverly Fairfax Historic District (listed in the NRHP in 2018), a high-density grouping of residential buildings with shared aesthetic and associative values that is historically significant in the areas of ethnic heritage (as an early Jewish enclave in Los Angeles), social history (as a haven for Holocaust survivors who settled in the Los Angeles area following World War II), and architecture (for its dwellings designed in Period Revival styles such as Spanish Colonial Revival, Mission Revival, and Tudor Revival). Anticipated cut-through traffic in the neighborhood from the Project, which is documented in the Transportation Assessment for the Project, is an unstudied impact on the historic district. Absent from the DEIR is a residential neighborhood protection plan or a neighborhood traffic-management plan to mitigate traffic and spillover-parking impacts to the historic district. With its narrow residential streets, increased traffic through the historic district would have an adverse effect on the pedestrian environment and the indirect effect of a diminished integrity for the Beverly Fairfax Historic District that should be addressed in the DEIR.

Response to Comment No. 26-E.2-10

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding impacts to the Beverly Fairfax Historic District. The Beverly Fairfax Historic District does not include any parcels on Beverly Boulevard directly across the street from the Project Site, and therefore it is not located within the Project Site vicinity for the purposes of the historical resources analysis, as discussed in the Historic Report (Draft EIR Appendix C.1) and Section IV.B, Cultural Resources, of the Draft EIR. More importantly, existing and future development within the Project Site do not have the potential to directly or indirectly impact the Beverly Fairfax Historic District due to the distance between the Beverly Fairfax Historic District and the Project Site. Nevertheless, for informational purposes, a discussion of the Beverly Fairfax Historic District is included on page IV.B-31 of the Draft EIR.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the NTMP that would be implemented by the Project as a non-CEQA measure. The NTMP would implement traffic calming measures to address potential cut-through trips. With regard to the comment regarding diminished integrity of the Beverly Fairfax Historic District associated with trips, as discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, potential cut-through trips would not diminish the integrity of the Beverly Fairfax Historic District. This comment fails to provide an explanation as to how increased trips through the Beverly Fairfax Historic District might translate to physical demolition, destruction relocation, or alteration such that the significance of the Beverly Fairfax Historic District would be materially impaired as defined by CEQA. Refer also to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply and that spillover parking into adjacent neighborhoods and properties is not anticipated.

Comment No. 26-E.2-11**Archaeological Resources**

The DEIR and supporting technical appendices are inadequate regarding the identification and analysis of Project effects on archaeological resources, principally because the DEIR lacks an archaeological resources report that identifies and evaluates archaeological resources in the Project area. The two-paragraph impact analysis of archaeological resources in the DEIR (p. IV.B-57–IV.B-58) relies on information from the Tribal Cultural Resources (TCR) report (Appendix C.2). Instead of completing an archaeological resources report, the DEIR references the TCR report, which is an incomplete treatment of the full range of expected archaeological resources in the Project area. The TCR report omits consideration of archaeological resources from the protohistoric and historical periods, provides only a cursory evaluation for the potential for buried resources to be

present, and fails to proactively look for specific types of buried cultural resources that have a high likelihood of being present. Standard practice, *especially in an area expected to contain archaeological resources*, is to prepare as part of the environmental review process a cultural resources technical report that includes the identification and evaluation of the full range of archaeological resources that might be expected in a project area and to use that information to assess project effects on buried historical resources. The DEIR lacks such a report and instead relies on the incomplete TCR report and offers mitigation measure CUL-MM-1 that incorrectly and improperly defers identification and evaluation of subsurface archaeological resources to construction monitoring during Project implementation rather than proactively identifying and evaluating archaeological resources as part of the analysis of Project effects. Such inadvertent discovery mitigation instead of thorough identification in the DEIR is wholly inappropriate in this case. This failure to adequately identify archaeological resources increases the likelihood of the Project to have a significant effect on buried historical resources.

Identifying and evaluating archaeological resources is particularly important in this area, given the known extent of archaeological resources present in this area. The TVC 2050 Project area has been urbanized for more than 70 years, and the lack of archaeological review presumes without support that archaeological deposits have been destroyed. To the contrary, the location of the Project Site and anticipated depth of excavation indicates that Project construction is likely to impact archaeological resources. It is necessary when conducting studies in urban settings, particularly when resources are anticipated, to follow a rigorous methodology to identify and evaluate likely archaeological resources. Proper analysis of Project effects on archaeological resources involves: (1) preparing a historic context for understanding past human land use, as well as the physical remains these uses create, and identifying where those remains would have likely been located; (2) conducting a geoarchaeological study evaluating the possibility that these remains could be preserved despite past environmental and development disturbances; (3) identifying if archaeological remains exist within the Project area and if they are a historical resource as defined by CEQA; and (4) analyzing the effects of the proposed Project on any archaeological historical resources. The minimal standards against which archaeological studies are assessed under CEQA are outlined in *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format* published by the California Office of Historic Preservation in 1990. This level of study, which was not conducted here, is required by CEQA during the EIR preparation process, and the methods, results, and recommendations from that research should be documented in an archaeological resources report.

Response to Comment No. 26-E.2-11

Refer to Response to Comments Nos. 13-7, 26-42, and 26-44 regarding the adequacy of the identification and analysis for archaeological and tribal cultural resources,

including those from all time periods that could be preserved below ground. These responses also provide an explanation for why the available evidence presented in multiple data sources were sufficiently detailed to provide a reasonable characterization of the existing conditions and the types of resources most likely to be encountered, and why the provisions included in the revised Mitigation Measure CUL-MM-1 are appropriate and adequate for avoiding or reducing potentially significant impacts to less than significant levels. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

Refer to Response to Comment No. 26-42 regarding the adequacy of the Project Site land use history and how geoarchaeological data were already considered in the analysis, which has been further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo also includes additional clarifications on why the resources described in the Draft EIR as being most likely to occur are unlikely to be considered historical resources under CEQA, and upon further review did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Regarding the use of the Archaeological Resource Management Reports (ARMR) Guidelines, as stated by the Office of Historic Preservation in the preface to that document, these are a set of guidelines and not a state mandated program. Conformance to the ARMR Guidelines is not specifically cited in any of the state or local regulations addressing archaeological or tribal cultural resources under CEQA. Refer to Response to Comment No. 26-42 regarding the standards for a CEQA review. Nonetheless, as the commenter has noted, the ARMR Guidelines can serve as a useful reference to help guide the preparation of an archaeological study and help non-specialists to assess technical reports. As the document was initially released in 1990 before the category of a tribal cultural resource was created, it does not address technical reports for tribal cultural resources as such but is still largely compatible. In the preface for the ARMR Guidelines, the Office of Historic Preservation also makes it clear that only specific portions of the guidelines may be relevant to a given report, and that it is at the discretion of the author to make this determination based upon the scale and complexity of a project. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides clarification and expert opinion on why professional judgment is necessary and how it is used when preparing technical reports based upon the ARMR Guidelines.

The Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) already incorporates many elements recommended in the ARMR that were determined by Dudek's qualified archaeological staff as being appropriate to the scale and type of the Project. Page 1 of the ARMR Guidelines specifies that the "content appropriate for any report

should be determined by the type and scale of a project, by the nature and scheduling of cultural resources studies, and by the complexity of the resources and the information under consideration.” This is reflected in the overall structure of the report and the inclusion of the sections that are relevant to an analysis of a fully developed urban location, i.e., one that did not require a fieldwork component. Examples of this include the following: the introductory pages are consistent with the ARMR Guidelines recommendations for the title page and management summary; an introduction is included on pages 1–5; a description of the regulatory, environmental, and cultural are provided on pages 11–22; methods are described in respective sections presented in the background research sections on pages 23–41; findings and management recommendations are recommended as separate sections in the ARMR Guidelines but have been combined into a single section on pages 43–44; the bibliography on pages 45 to 50 is consistent with the ARMR Guidelines section recommending references cited; and appendices with confidential information are included as recommended. Because the ARMR Guidelines are intended to address the full range of possible studies, the recommended contents within each of these sections are quite broad and include a substantial amount of detail that is not relevant to the analysis for the current Project. As such, the Tribal Cultural Resources Report, included in Appendix C.2 of the Draft EIR meets the required professional standards and provides substantial evidence relevant to the analysis of archaeological resources, which are otherwise presented in Section IV.B, Cultural Resources, of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further analysis of why there was an appropriate level of professional judgement and expertise used to determine which parts of the ARMR Guidelines were relevant to include in the Tribal Cultural Resources Report, including the overall structure and content within each section.

Comment No. 26-E.2-12

Cultural Setting

The Cultural Setting section in the TCR report is a wholly inadequate historic context because it fails to identify the full range of human land-use history of the Project area as it relates to the potential for archaeological resources to be present. Numerous fatal flaws exist in this section.

First and foremost, a poor command of local archaeological literature is evident in the report. The cultural setting for the prehistoric period incorrectly focuses on the San Diego and the Mojave Desert regions instead of the Los Angeles Basin. The minimal discussion of the Los Angeles Basin relies on outdated information and ignores recent research in downtown Los Angeles and the nearby coastal communities. The section fails to cite many well-known scholarly studies and reports and contains omissions, incomplete information, and incorrect information. For example, the report fails to mention the early burial at

nearby La Brea Tar Pits, states incorrect dates for the introduction of mortars and pestles, and misrepresents the burial practices of the Gabrielino tribe.

Second, no Project-specific information is presented on historical-period use of the Project area as it relates to the potential for archaeological resources. This information is critical for anticipating the kinds of buried cultural resources that potentially exist. For example, the DEIR fails to consider land use prior to the construction of Television City. The Project area and adjacent properties have a long and rich history starting in the early Mexican Rancho Period with the founding of Rancho La Brea in 1828; the construction of the Rancho LA Brea Adobe (also known today as Gilmore Adobe) around 1852; the development of the local oil industry in the early twentieth century; the development of the early sports entertainment industry, especially Gilmore Field, Gilmore Stadium, and related businesses; and culminating with the development of Television City in 1952. None of this history is included in the archaeological analysis section of the DEIR or the TCR report. Conspicuously absent is any meaningful discussion on the Rancho La Brea Adobe, located approximately 130 feet from the TVC 2050 southern property line. There is no discussion in the TCR report on the history of the Adobe and the extent of activities related to the Adobe that might have included portions of the Project area. Nor does the TCR report consider if Native American labor was used to construct the original adobe building or if Native Americans were used as domestic help or ranch hands at the Adobe and adjacent lands, which was a common occurrence in the 1850s.

Response to Comment No. 26-E.2-12

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the issue of the historic context and the adequacy of the identification and analysis of archaeological and tribal cultural resources, including those from the La Brea Tar Pits and those associated with the Gilmore Adobe.

Refer to Response to Comment No. 26-42 regarding the land use history considered in the analysis, including the ventures pursued by the Gilmore family—oil operations, Gilmore Field and Gilmore Stadium—and the conversion to Television City.

Regarding the introduction of mortars and pestles and Gabrielino burial practices, the comments are referring to details that are matters of scholarly research rather than misrepresentations as the commenter has stated. Discrepancies that may exist do not invalidate the analysis, given the substantial evidence presented in Section IV.B, Cultural Resources, and Section IV.L, Tribal Cultural Resources, of the Draft EIR, and Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion regarding the introduction of mortar and pestles in the archaeological record and how this is presented in the Tribal Cultural Resources Report as a matter of on-going

research and subject to scholarly debate. The Supplemental Cultural Memo also gives expert opinion confirming that valid scholarly sources were used to describe Gabrielino burial practices and why this one topic is considered to be one of many factors within the larger background on Gabrielino lifeways presented in the Tribal Cultural Resources Report.

Regarding the potential contribution of Native American labor in the construction of the Gilmore Adobe, the topic relates to a particular aspect of the land use history that is indirectly related to the consideration of potential archaeological or tribal cultural resources. The role of Native American labor in Los Angeles and California history is an important subject that is worthy of continued scholarly research and consideration by archaeologists where specific data have been identified. Were the Gilmore Adobe located within the Project Site, this subject would potentially warrant further consideration as part of the environmental review. As the Gilmore Adobe is located outside of the Project Site, any relevance to the analysis of archaeological or tribal cultural resources for the Project Site would necessarily be related to activities that occurred in association with its construction or use that happened to have occurred in the portion of the property to the north of the building, most of which was used as pasture.

Additional information on the Gilmore Adobe and the associated archaeological site (CA-LAN-3045H) were discussed at length in the reports by Cogstone, which were prepared after having monitored the construction of The Grove at Farmers Market commercial development that directly involved the Gilmore Adobe and immediate surroundings. These results were already referenced as having been considered in the original analysis and none of these sources has ever identified evidence indicating that Native Americans played a role in constructing the adobe or conducting any associated activities that were carried out within the Project Site and would be likely to have produced physical evidence identifiable as a tribal cultural resource. While the topic of Native American labor during Spanish colonization and periods of Mexican and American governance is important to consider in our understanding of the history during and after Spanish colonization, there has not been substantial evidence identified that suggests the development of the Gilmore Adobe was significantly supported by Native American labor. This is not to imply that such a connection may not exist, but given the lack of any prior substantial evidence previously discussed by reports that were focused exclusively on the building and its activities, there is no reason that further research would need to be conducted to provide an adequate characterization of the existing conditions or potential for impacts to tribal cultural resources within the Project Site. Therefore, further analysis is unwarranted and additional information would only constitute a minor detail specifically regarding the analysis of tribal cultural resources. Furthermore, the omission of a more detailed investigation of this specific research question in the Draft EIR and the Tribal Cultural Resources Report does not invalidate the analysis or conclusions, especially when the larger body of evidence and information presented in the analysis is considered.

Additional explanation of how these results further support the analysis presented in the Section IV.B, Cultural Resources, of the Draft EIR are described in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-13

Background Research

The Background Research section of the TCR report lacks basic information and is completely disconnected from the cultural setting. The Background Section of the TCR report includes the results of a records search at the South Central Coastal Information Center. The records search was compiled by means of looking at all previously recorded cultural resources and reports within a 0.5-mile radius of the Project area. This search area is wholly inadequate for the TVC 2050 property because Los Angeles was urbanized long before cultural resources studies were required for development projects, and little is known regarding the distribution of archaeological sites in the vicinity. Consequently, a 0.5-mile-radius records search fails to characterize the archaeological sensitivity of the Project area and contributes little to the historic context. In this setting, a wider radius records search area, like 10 miles, for archaeological resources is necessary. Supplemental research using academic literature is also required to locate archaeological sites that were documented prior to the 1950s.

The section relies exclusively on HistoricAerials.com for the topographic map and aerial photograph review. As a result, the report fails to consult historic rancho maps, General Land Office (GLO) maps, Sanborn Fire Insurance maps, and other historical maps that show the locations of previous structures and activity areas. The TCR report also fails to review other sources of historical aerial imagery such as those contained in the Project proponent's Hazards and Hazardous Materials report (Appendix G). These aerial photographs extend the time depth of the imagery from 1948 back to 1923. Other historical aerial photographs by Spence and Fairchild are readily available but were not reviewed. Of the few aerial photographs reviewed, the TCR report does not contextualize any of the structures identified in the images and fails to even identify Gilmore Stadium.

Response to Comment No. 26-E.2-13

Refer to Response to Comment No. 26-42 regarding the records search radius and why 0.5 mile was sufficient for acquiring the data necessary to substantiate the assessment of archaeological and tribal cultural resources based on the presence of CA-LAN-3045H and the studies completed in association with its recording for a parcel adjacent to the Project Site.

Regarding the need for supplemental research using academic literature, the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR includes a substantial amount of academic literature that are listed in the references cited.

Refer to Response to Comments Nos. 13-7 and 26-42 regarding the entire body of evidence considered in the assessment of cultural and tribal cultural resources, broader discussions of the historical context and specific analysis of the development of the Project Site. Using the existing historical context and data obtained from multiple sources, including but not limited to those cited in the comment, substantial evidence was identified and indicated sensitivity for archaeological resources. Based upon the description of existing conditions and available evidence presented in the Draft EIR and technical reports, the analysis of archaeological resources does not require additional evidence to support the conclusion and define an appropriate mitigation measure. An exhaustive map search of all available historical maps and a more detailed analysis of the aerial imagery would only contribute minor details that serve to further reinforce the conclusions already reached and be unlikely to identify any new or substantially more significant impacts than what were disclosed in the Draft EIR, or considered in the Tribal Cultural Resources Report, Historic Report (Appendix C.1 of the Draft EIR), Preliminary Geotechnical Engineering Investigation (Appendix E.1 of the Draft EIR), and Phase I Environmental Site Assessment (included in Appendix G of the Draft EIR). Nonetheless, further review of the land use history (including a review of all data sources referenced in the Draft EIR) was done while preparing the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. After having reconsidered the available evidence, the Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-14

A Sacred Lands Files Search requested of the California Native American Heritage Commission (NAHC) was conducted as part of the background research. Sacred Lands Files searches are generally done as part of the information gathering process for archaeological studies dealing with the prehistoric period. While the NAHC Sacred Lands File search did not locate any tribal cultural resources within the Project area, follow-up with affiliated tribes is necessary. The standard letter from the NAHC states that negative results do not negate the possibility of those types of resources being present and therefore suggests reaching out to tribes and individuals affiliated with the area listed with the Sacred Lands Files search results. No tribal outreach was conducted, as recommended by the NAHC; instead, the study relied on the results of AB-52 government-to-government consultation to obtain relevant information. However, the NAHC list for AB-52 consultation is a separate list from the Sacred Lands Files list. In the case of the TVC 2050 property, although the named tribes are the same for both lists, three individuals named by the NAHC in the Sacred Lands File search request results are not named on the

AB-52 consultation list and were not contacted. These two forms of Native American engagement serve different purposes, and one should not be substituted for the other.

Response to Comment No. 26-E.2-14

Six of the nine contacts on the contact list returned with the NAHC's SLF results (NAHC Contact List) were also listed on the City's list of tribes who requested notification under Public Resources Code (PRC) Section 21080.3.1, as amended by AB 52 (AB 52 List). Three of the individuals listed on the NAHC Contact List were also not listed on the AB 52 List. In two of the cases, a second contact with the same tribal organization was included in the AB 52 List and were sent written notifications that received no reply. Lovina Redner of the Santa Rosa Band of Mission Indians was the only individual or tribal organization on the NAHC Contact List who was not contacted. As a tribal organization affiliated with the Cahuilla, the ancestral territory of the Santa Rosa Band of Mission Indians is located more than 50 miles to the east, within parts of what are now Riverside, San Bernardino, San Diego, and Imperial Counties. The Project Site is within the Gabrielino ancestral territory and the western part of what is now Los Angeles County. Although there is overlap in the areas where ancestral territories met, the Project Site is not near the Cahuilla even when accounting for any overlap. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides expert opinion confirming that the Project Site is situated within the traditional territory of the Gabrielino and not the Cahuilla, who are otherwise unlikely to contribute substantial information not already considered.

As indicated in Comment No. 26-E.2-14, the NAHC Contact List is distinct from the City's AB 52 List and the NAHC recommends conducting the SLF follow-up outreach as an information gathering effort rather than fulfilling the other stipulations required in government-to-government consultation; however, the intent of notifying the tribal members on the AB 52 List is to seek consultation, and information gathering is a fundamental component of that process. Therefore, the efforts made to seek information on potential resources in the Project Site through the notifications sent to individuals on the AB 52 list is part of the City's good-faith effort to seek this information from tribes, especially those who are more likely to have knowledge of a specific resource because they are more local to the Project Site.

The City's efforts to fulfill the NAHC's recommendation to request information from all tribal organizations on the NAHC Contact List was substantially adequate. Further, the tribal cultural resource analysis for the Project is adequate given that substantial information on the potential for resources within the Project Site was able to be obtained during preparation of the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR), as is presented in the Section IV.B, Cultural Resources, and Section IV.L, Tribal Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-15**Preservation Issues and Geoarchaeological Studies**

Wholly missing from the DEIR and TCR report is any kind of a geoarchaeological study analyzing the likelihood for buried prehistoric or historical-period resources in the Project area. Findings of the geotechnical investigation should also be used in a meaningful way to analyze the potential for intact buried archaeological deposits in the Project area. The TCR report fails in this regard by only providing a cursory review of the soils data in the Project geotechnical report without interpreting those data as they relate to the potential for buried archaeological deposits. For example, the logs of several borings document dark-gray to black or dark-brown to black sediments present immediately below the fill. Dark sediments can sometime indicate the presence of anthrosols or other soils with potential for containing cultural resources. This information is not discussed in the TCR report. The TCR report acknowledges that a drainage crossed the west side of the Project area prior to modern development but does not discuss how this drainage may have affected Native American settlement patterns in the area.

The DEIR and TCR report also fail to consider known buried historical-period resources in the Project area. Footnote 145 on Page 63 of CBS Television City, Los Angeles Historic Resource Assessment—prepared by ARG in 2018 and part of Appendix C.1 of the DEIR—states that remnants of Gilmore Field dugouts were encountered during excavation for the East Studio Building in 1991. This information is omitted from the TCR report and from the cultural resources section of the DEIR. The fact that archaeological remains from Gilmore Field were encountered as recently as 1991 shows the high sensitivity of the Project area for buried archaeological deposits and is further evidence that the DEIR and TCR report are inadequate for analyzing the effects of the Project on archaeological resources.

Response to Comment No. 26-E.2-15

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the data sources used to characterize the potential for buried prehistoric and historical-period resources—also referred to as a geoarchaeological study—as discussed in Section IV.B, Cultural Resources, of the Draft EIR. The results of the geotechnical investigation were reviewed and summarized on pages 29 to 30 in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, which notes the presence of the darker sediments and identifies them as being among the “native soils,” meaning formed through natural depositional processes, and are distinguished from those defined as “artificial fill soils” that are formed as the results of mechanical alteration. After having considered all sources of evidence, including review of the subsurface exploratory boring investigations, the Tribal Cultural Resources Report concluded that subsurface soils are unlikely to support intact tribal cultural resources. This is further supported by the lack of any Native American archaeological finds being identified during monitoring by Cogstone and Greenwood and Associates

during development of The Grove at Farmers Market in the parcels to the south of the Project Site. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further clarification of how the information presented in the Draft EIR and various technical reports support the impact analysis and conclusions presented in the Section IV.B, Cultural Resources, of the Draft EIR.

Regarding the drainage crossing the west side of the Project Site that was mentioned in Tribal Cultural Resources Report using the information from the geotechnical investigation, proximity to stream courses as a factor in Gabrielino or Tongva settlements is mentioned on page 17 of the Tribal Cultural Resources Report and repeated on page IV.L-7 of Section IV.L, Tribal Cultural Resources, of the Draft EIR. There are several reasons why this possible correlation was not discussed at length in the Tribal Cultural Resources Report or Section IV.L, Tribal Cultural Resources, of the Draft EIR. This correlation should not be confused with causation, which is to say that because Native American settlements are often found near stream courses, this does not mean that all stream courses had settlements established along them or that all places where settlements were established produce physical evidence that survived as an archaeological deposit. The former stream course described in the geotechnical investigation and Tribal Cultural Resources Report extended to the south of the Project Site. Response to Comment Nos. 13-7 and 26-42 address the data sources used to characterize the potential for buried Native American sites, which includes the recording of CA-LAN-3045H directly south of the Project Site. Given that no Native American components were found during the recording of CA-LAN-3045H, this suggests that whatever correlation there was between Native American settlement patterns and former stream courses, this did not result in the preservation of any physical remains that could be identified here. Accordingly, the Tribal Cultural Resources Report provides a reasonable characterization of the existing conditions that adequately supports the analysis for potential impacts of the Project on tribal cultural resources. In making these correlations more explicit here, no new or substantially more significant impacts were identified than what were disclosed in the Section IV.L, Tribal Cultural Resources, of the Draft EIR and considered in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, further summarizes the information and provides expert opinion on the former drainage and did not identify any new or substantially more significant impacts.

Refer to Response to Comment Nos. 13-7 and 26-42 for a summary of the efforts made to obtain substantial evidence used to assess the potential for tribal cultural resources within the Project Site. These responses also provide an explanation for why the available evidence presented in multiple data sources were sufficiently detailed to provide a reasonable characterization of the existing conditions and the types of resources most likely to be encountered.

Refer to Response to Comments Nos. 13-7 and 26-42 regarding the overall analysis of buried historical-period resources, generally, and the acknowledgement of the sensitivity made in Section IV.B, Cultural Resources, of the Draft EIR.

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the historical land uses, including those associated with the Gilmore family's business ventures, and how these were accounted for in the analysis presented in Section IV.B, Cultural Resources, of the Draft EIR. Regarding the specific reference to the Gilmore Field dugout, the presence of this only further reinforces the conclusion that there is sensitivity for historical archaeological resources, as was stated on page IV.B-58 of Section IV.B, Cultural Resources, of the Draft EIR. Thus, the existing body of evidence is adequate for characterizing the existing conditions within the Project Site and provides a reasonable means of identifying mitigation measures capable of reducing or avoiding potentially significant impacts, including those that could be associated with Gilmore Field. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional detail and expert opinion addressing the historical land uses and how the provisions of Mitigation Measure CUL-MM-1 provide a reasonable and feasible means of mitigating potentially significant impacts to archaeological resources that may be encountered, including resources assessed as having the greatest likelihood of being present. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

Comment No. 26-E.2-16

Identifying Buried Archaeological Deposits

Identification efforts for archaeological resources failed to consider buried deposits from development and activities prior to 1952. The development of a thorough historic context along with in-depth archival research and a geoarchaeological study would identify the types and locations of archaeological resources likely to exist in the Project area. These locations should be explored through remote sensing, such as ground-penetrating radar, or through mechanical excavation like backhoe trenching. As noted above, remnants of Gilmore Field dugouts were encountered during excavation for the East Studio Building foundation in 1991, indicating that buried deposits are present. Archaeological monitoring during grading as recommended in CUL-MM-1 is useful for identifying and treating unanticipated resources but should not be used in lieu of active searching when there are anticipated buried resources likely to be present. Failing to adequately identify anticipated archaeological resources prior to construction greatly increases the potential for the Project to have a significantly [sic] effect on historical resources.

Because insufficient effort was made to identify and evaluate such resources, the DEIR fails to adequately analyze the effects of the proposed TVC 2050 Project on archaeological resources. Failure to develop a thorough historic context, failure to adequately consider archaeological preservation issues and prepare a geoarchaeological study, and failure to search for likely buried archaeological deposits renders the environmental analysis incomplete.

Response to Comment No. 26-E.2-16

Refer to Response to Comment Nos. 13-7, 26-42, and 26-44 regarding the methods by which subsurface archaeological potential was assessed and the consideration of historical land uses in the analysis, including the period in which Gilmore Field Stadium was operated.

Refer to Response to Comment No. 26-42 regarding the reasons why methods such as remote sensing or mechanical excavation are infeasible and unnecessary to support the findings in the Draft EIR, which considers the substantial evidence already presented concerning the likelihood of archaeological resources and the proposed means of mitigating the potential for impacts. This evidence includes building materials identified in geotechnical cores presented in the geotechnical investigation in Appendix E.1 of the Draft EIR and reviewed in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Refer to Response to Comment No. 26-44 regarding the discussion of how the provisions of Mitigation Measure CUL-MM-1 allow for adequate means of identification, evaluation, and treatment of any resources that may be present, and supports the conclusion that with implementation of the proposed mitigation, the potential impacts to archaeological resources would be less than significant.

The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional detail and expert opinion addressing the methods used to assess the potential for buried resources and how the provisions of Mitigation Measure CUL-MM-1 provide a reasonable and feasible means of mitigating potentially significant impacts to archaeological resources that may be encountered, including resources assessed as having the greatest likelihood of being present. Specifically, by identifying the qualification standards for retaining a Qualified Archaeologist, specifying the criteria by which the CRMTTP shall be prepared, requiring a worker training program, and identifying the timing necessary for each of these steps, implementation of Mitigation Measure CUL-MM-1 provides a reasonable means by which potential impacts to resources would be mitigated: a Qualified Archaeologist would: identify any archaeological resources that may be present; evaluate them as a historical resource and unique archaeological resource; and proceed in implementing mitigative treatment measures that either avoid or allow for the recovery of scientifically consequential information, among other potential actions that could be

appropriate based on the specific type of resource identified. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

Comment No. 26-E.2-17

Tribal Cultural Resources

Native American consultation as documented in the DEIR and the TCR report fails to comply with the regulatory requirements of SB 18, and although the consultation efforts do comply with the regulatory requirements of AB 52, this consultation is inadequate because it does not meet the good-faith effort standard recommended by the California Office of Historic Preservation and the NAHC. Furthermore, the cultural setting in the TCR report is deficient in basic information.

Native American Consultation

One defining characteristic of a tribal cultural resources is that the resource has cultural value to a California Native American tribe. Because of this, tribal cultural resources can only be identified by California Native American tribes. Archaeologists can identify resources that are likely to have cultural value to a tribe, but only the tribes have the expertise to identify and determine the importance of specific resources and landscapes that may not be recognized even by an experienced archaeologist. Because of this, meaningful engagement with tribal governments is necessary to adequately understand and mitigate the impacts to tribal cultural resources.

The AB-52 consultation described in the TCR report consisted of sending a notification letter to those tribes listed on the City's AB-52 Consultation Contact List. No tribes responded to the consultation request within the prescribed 30-day response period. However, the letters were sent near the height of the COVID-19 pandemic when, like most of the nation, tribal representatives may have been working remotely, and they might not have received the notification letters. Appendix C.3 contains an example of an AB-52 notification letter sent to the tribes and contains copies of "Delivery Confirmations." It is unclear if the delivery confirmations are merely a document that the letters were sent by certified mail, or if the receipts are meant to confirm that the letters were received by the intended recipients. Best practices for meaningful engagement as recommended in 2005 by the *State of California Tribal Consultation Guidelines Supplement to General Plan Guidelines* holds that written correspondence requesting consultation with a tribe may not be sufficient and that telephone calls or more direct forms of contact may be required. Similarly, the NAHC in *Tribal Consultation Under AB52: Requirements and Best Practices* recommends lead agencies consult with tribes about cultural resources in advance of AB

52 consultation and also to send more than one consultation notice. Standard practice is to follow up the consultation notification letters with e-mail notification and then to follow up further by telephone with each tribal entity who has not responded by letter or e-mail. There is no documentation in the DEIR to indicate this standard practice of outreach was followed.

Because the Project is being implemented through a Specific Plan and General Plan amendment, tribal consultation following the requirements of SB-18 is also required. There is no documentation of SB-18 consultation in any of the cultural resource documents. SB-18 consultation is not the same as AB-52 consultation or the NAHC Sacred Lands Files Search request process and involves its own schedule and timeline for tribes to respond to the notification. This is a serious and fatal flaw that must be corrected, and the DEIR recirculated with any new information that is obtained during a SB-18 consultation. The City must comply with its separate SB-18 obligations.

Response to Comment No. 26-E.2-17

Refer to Response to Comment No. 26-E.2-14 regarding the City's efforts to contact tribal parties and the Response to Comment Nos. 13-7, 26-42, and 26-44 on the efforts made to obtain substantial evidence used to assess the potential for archaeological and tribal cultural resources within the Project Site and put forward mitigation measures capable of avoiding or reducing potentially significant impacts to less than significant levels.

Regarding the adequacy of the City's tribal consultation efforts, written notifications were sent to all tribal parties included on the City's AB 52 List pursuant to the requirements of PRC Section 21080.3.1, as amended by AB 52. No responses were received after 30 days nor have any responses been received since. By sending the written notification letters via certified mail through the U.S. Postal Service with complete information on the Project description and within the timeframe specified by the PRC, the City has acted in good faith in their compliance to fulfill their obligations under PRC Section 21080.3.1. The City also considered evidence presented in the Tribal Cultural Resources Report, which is included in Appendix C.2 of the Draft EIR, and included a standard condition of approval that includes a provision ensuring tribal involvement should a resource be identified. These actions demonstrate the City's good-faith effort to analyze the potential for impacts to tribal cultural resources and mitigate any potentially significant impacts consistent with their standard practices under CEQA. USPS tracking slips were included in Appendix C.3, AB 52 Notification Letter and Delivery Confirmations.

The commenter states that making phone calls as a supplement to written tribal notification letters and consulting with culturally affiliated tribes before AB 52 consultation

are standard practices, and that these are recommended as best practices in the *State of California Tribal Consultation Guidelines Supplement to General Plan Guidelines*¹⁰³ published in 2005 by the Governor's Office of Planning and Research (OPR), and in an NAHC presentation titled *Tribal Consultation Under AB52: Requirements and Best Practices*.¹⁰⁴ However, OPR's guidance document and the NAHC's presentation identify supplemental phone calls and advanced consultation as optional steps, but neither are needed to meet the requirements of PRC Section 21080.3.1. City Planning does not routinely conduct follow-up phone calls to verify receipt of letters since it is not legally required to do so as part of the process to comply with PRC Section 21080.3.1. Considering the information presented in the Tribal Cultural Resources Report, which did not find a high likelihood for a tribal cultural resource to be identified in the Project Site and concluded that the potential for impacts was less than significant, City Planning did not have a reasonable basis to make an exception to the standard process used to meet regulatory compliance. Regarding the City's obligations for compliance with SB 18, the City of Los Angeles is a charter city, and Government Code Section 65700 exempts charter cities from compliance with everything in Chapter 3 of the State Planning and Zoning Law except for a handful of provisions, including Section 65302 for the required elements in a General Plan, the requirement for other plans to be consistent with the General Plan, and Article 10.6 (the Housing Element provisions), and Section 65400(a)(2) (annual report). SB 18 added Sections 65352.3 and 65352.4 to the Government Code. These sections are in Chapter 3 of the Government Code and are therefore, not required of charter cities under Section 65700. As a general matter, Section 65700 exempts a charter city from compliance with the tribal consultation process in Sections 65352.3 and 65352.4.

Comment No. 26-E.2-18

Cultural Setting

The cultural setting in the TCR report is wholly inadequate for the reasons explained in the discussion of archaeological resources above. Namely, the discussion of the prehistoric period (1) focuses on the wrong region, (2) contains outdated information, (3) ignores recent research, (4) fails to cite many well-known scholarly studies and reports, and (5) contains omissions and incomplete and wrong information. The cultural setting also fails to include Project-specific history as it relates to Native American use of the property during the historical period. Specifically, Rancho La Brea Adobe is located less than

¹⁰³ Governor's Office of Planning and Research, State of California Tribal Consultation Guidelines, Supplement to General Plan Guidelines, November 14, 2005, www.opr.ca.gov/docs/011414_Updated_Guidelines_922.pdf.

¹⁰⁴ Native American Heritage Commission, Tribal Consultation Under AB 52: Legal Requirements and Best Practices for Tribes, April 20, 2017, Public Hearing, <https://nahc.ca.gov/wp-content/uploads/2017/04/AB52-Tribal-Consultation-For-Tribes-NAHC.pdf>.

130 feet from the TVC 2050 property and yet there is no discussion in the TCR report regarding whether there was a Native American presence at the Adobe either during the original construction or later during occupation of the Adobe and operation of any attendant agricultural activities.

Response to Comment No. 26-E.2-18

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the issue of the regional historical context, the adequacy of the background research, identification, and analysis for archaeological and tribal cultural resources, including the discussion of the Gilmore Adobe.

Refer to Resource to Comment No. 26-E.2-12 regarding the issue of Native American labor, alternative source materials omitted from the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR), and discrepancies that may exist concerning minor details for topics that are either matters of scholarly debate or are only indirectly related to the background setting.

Comment No. 26-E.2-19

Paleontology

The Geology and Soils section of the DEIR (Section IV.D.) fails to discuss the depths at which native sediments occur beneath the Project area and the nature of the underlying geology, especially as they relate to paleontological resources. This section uses a variety of geologic units (i.e., “older, elevated Quaternary alluvial deposits,” “Pleistocene age alluvial deposits,” “older Quaternary age sedimentary deposits,” “Pleistocene alluvium,” “Pleistocene age older alluvial deposits,” and “Palos Verdes Sand”) interchangeably to describe the sediments underlying the Project area, when those terms have specific meanings and are not necessarily interchangeable. Due to this variability in terminology, the nature of the underlying geology within the Project is not made clear, nor are the depths at which each geologic unit is expected to be encountered during construction. In other words, the DEIR wholly fails to clearly characterize the paleontological potential of the Project site and vicinity.

To add to this confusion, the DEIR uses outdated definitions for significant fossiliferous deposits and significant paleontological resources provided by the Society of Vertebrate Paleontology (SVP 1995 vs. SVP 2010). Though it is not clear which schema for assigning paleontological resource potential was used for this section, it is implied to be the SVP system. However, the geology underlying the Project area is assigned a “moderate to high” paleontological sensitivity, which is a designation that does not exist within SVP.

Response to Comment No. 26-E.2-19

Regarding the nature of the underlying geology and terminology used in Section IV.D of the Draft EIR concerning the type of deposits that have a higher potential to contain paleontological resources, namely, older Quaternary age sedimentary deposits known as Pleistocene, refer to Response to Comment No. 35-90 and the Paleontological Resources Review Memorandum (contained in Appendix F of the Draft EIR). As stated therein, those documents conservatively assumed that Pleistocene age alluvial deposits could exist immediately below the artificial fill at the Project Site, as discussed on page two therein. Also, the Preliminary Geotechnical Engineering Investigation, attached as Appendix E.1 of the Draft EIR, identified the Pleistocene age alluvial deposits below the artificial fill as shallow as three feet below grade.

To clarify, the critical aspect of the nature of the underlying geology is the presence of Pleistocene age alluvial deposits. The Los Angeles Basin is filled with a thick sequence of sedimentary deposits that, at the surface, is capped by sedimentary deposits from the Quaternary Period. The Quaternary Period includes the Holocene Epoch and the Pleistocene Epoch, with the Holocene Epoch following the Pleistocene Epoch. Cohen et al. 2021 lists the Pleistocene as being 2.58 million to 11,700 years old, with the late Pleistocene being 129,000 to 11,700 years old, as mentioned on page 1 of the Paleontological Resources Review Memorandum. The Holocene deposits (less than 11,700 years ago) are generally too young to contain paleontological resources. However, Holocene deposits are often underlain by Pleistocene deposits. It is these Pleistocene, or “Ice Age” deposits that have the potential to contain paleontological resources, which are the remains or traces of prehistoric life. Thus, these Pleistocene age deposits are likely to yield some paleontological resources during construction and are thus assigned high paleontological resources sensitivity or potential.¹⁰⁵

To evaluate the presence of Holocene and Pleistocene age deposits at the Project Site, the Paleontological Resources Review Memorandum first reviewed the published mapping for the general area previously prepared by Dibblee and Ehrenspeck, which was then utilized to prepare the report for the Draft EIR.¹⁰⁶ The Project Site is mapped as being underlain by older Quaternary alluvial deposits that are late Pleistocene in age

¹⁰⁵ Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.

¹⁰⁶ Dibblee, T.W. and H.E. Ehrenspeck. 1991. Geologic map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California, Dibblee Geological Foundation, Dibblee Foundation Map DF-30, 1:24,000.

(approximately 129,000 to 11,700 years old).^{107,108} These same deposits are mapped to the south, in the area of the La Brea Tar Pits and Museum.

However, the published mapping does not provide details as to the Project Site with respect to the estimated depths below grade surface of the Holocene and Pleistocene age deposits. Accordingly, the Paleontological Resources Review Memorandum references the Preliminary Geotechnical Engineering Investigation prepared for the Project Site, prepared by Geotechnologies, Inc. and provided in Appendix E.1 of the Draft EIR. The Preliminary Geotechnical Engineering Investigation states that “native soils consist of older alluvial deposits,” which is associated with Pleistocene age deposits. The report states that such alluvial deposits are present at the Project Site beginning at 3 to 20 feet below grade surface. The report also states that “the native soils consist predominantly of sediments deposited by river and stream action typical to this area of Los Angeles County.”

A confidential record search from the Natural History Museum of Los Angeles was also analyzed as part of the Paleontological Resources Review Memorandum. Geological units at localities near the Project Site were reported to include: older alluvium, unknown formation (Pleistocene, muddy sands); Palos Verdes Sand; Palos Verdes Sand, submember A (claystone and siltstone interbedded with sandstone); and unknown formation (Pleistocene; green clay).

The common link between each of these geological units is their time period, which is the Pleistocene Epoch. As to the Palos Verdes Sand, that is a geological unit from which resources from some of the nearby localities were recovered according to the records search conducted by the Natural History Museum of Los Angeles County. The Palos Verdes Sand is a terrace deposit found in the Los Angeles Basin,¹⁰⁹ which was recorded at 46 feet below the surface at one nearby project site according to the records search results.¹¹⁰ As mentioned, this named geological unit is Pleistocene in age and is assigned high paleontological resources sensitivity or potential per the 2010 SVP Guidelines.

¹⁰⁷ Dibblee, T.W. and H.E. Ehrenspeck. 1991. Geologic map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California, Dibblee Geological Foundation, Dibblee Foundation Map DF-30, 1:24,000.

¹⁰⁸ Cohen, K.M., S.C. Finney, P.L. Gibbard, and J.-X. Fan. 2023. The ICS International Chronostratigraphic Chart.” Episodes 36: 199—204. 2013.

¹⁰⁹ Woodring, W. P., Bramlette, M. N., and Kew, W. S. W., 1946, Geology and paleontology of Palos Verdes Hills, California: U. S. Geological Survey Professional Paper 207, 145 p.

¹¹⁰ Natural History Museum of Los Angeles County (LACM). 2021. Paleontological Resources for the TVC 2050 Project, in the City of Los Angeles, Los Angeles County, Project Area. Unpublished Records Search Results Letter from A. Bell of the Natural History Museum of Los Angeles County, Los Angeles, California.

The Paleontological Resources Review Memorandum for the Project Site anticipated that similarly aged Pleistocene deposits may be encountered at depth below the artificial fill at the Project Site, which ranges from 3 to 20 feet in depth across the Site. Accordingly, the revised mitigation measure (refer to Response to Comment No. 35-91) makes clear that the qualified paleontological resource monitor shall monitor all ground disturbance activities within “high sensitivity deposits (e.g., Pleistocene age deposits).”¹¹¹

Refer to Response to Comment No. 35-90 regarding the references to the 1995 and 2010 SVP Guidelines, and the analysis of paleontological sensitivity.

Comment No. 26-E.2-20

Finally, this section calls for a single mitigation measure for paleontology (DEIR p. IV.D-27, GEO-MM-1) calling for construction monitoring by a paleontologist. In addition, the mitigation measure fails to provide the entirety of the qualifications set out by SVP for a project paleontologist and does not set forth any qualifications for that of a paleontological monitor. Due to the geologic units underlying the Project area and the proximity to “La Brea”-type asphaltic deposits, an experienced professional monitor should be required during Project construction (DEIR, pp. IV.D-15–16).

Importantly, given the known extent of paleontological resources present in this area, the mitigation measure also lacks other important stipulations of mitigation measures approved for recent projects (LACMA Permanent Collections Building [Eyestone Environmental 2019] and Academy Museum of Motion Pictures [Los Angeles City Planning Department, Environmental Review Section 2015]) in close proximity to the Project area and in the same geologic unit, including requirements for fossil preparation, assignment of an approved repository, donation of significant paleontological resources to the approved repository, review of the Mitigation and Treatment Plan by curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and at the Natural History Museum La Brea Tar Pits & Museum, mandate of a Worker Environmental Awareness Program (WEAP), authority of the paleontological monitor to divert/direct ground-disturbing activities in the event of discovery, and preparation of a final report at the conclusion of monitoring.

¹¹¹ Note that the mitigation measure for paleontological resources has also been revised to include the definition of a Qualified Paleontological Resource Monitor according to SVP (2010) guidelines. Refer to Response to Comment No. 35-91 and Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Response to Comment No. 26-E.2-20

Refer to Response to Comment No. 35-91 regarding the revision of Mitigation Measure GEO-MM-1 to expressly incorporate the qualification requirements for both a Qualified Professional Paleontologist and Qualified Paleontological Resource Monitor as defined by the 2010 SVP Guidelines and include (a) a worker environmental awareness program, (b) the authority of the monitor to stop construction work if resources are discovered, and (c) the preparation of a post-monitoring report.

The commenter also recommends that the mitigation measures listed for the LACMA, Academy Museum of Motion Pictures, and Metro D (Purple) Line projects be reviewed and certain elements from those measures be incorporated into the mitigation measure (Mitigation Measure GEO-MM-1) for the Project.

The Los Angeles County Museum of Art, or LACMA (2019), outlined mitigation measures for paleontological resources including:

...retain a qualified paleontologist, who meets the qualifications established by the Society of Vertebrate Paleontology (SVP), to develop and execute a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) for ground-disturbing activities. The PRMMP shall be in conformance with SVP guidelines (2016) [sic] and prepared to the satisfaction of the curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and the curatorial staff of the Natural History Museum La Brea Tar Pits & Museum...

The LACMA (2019) mitigation measures also stipulate that “...the paleontologist shall prepare a Worker Environmental Awareness Program (WEAP)...” Also, the “...monitor, under the supervision of the paleontologist, shall monitor all ground-disturbing activities...” and “...if paleontological resources are encountered during monitoring, all construction activities in the area of the find...shall be temporarily halted so that the paleontologist can evaluate the find....” The mitigation measures for LACMA (2019) also provide for final reporting, which is now provided in the revised Mitigation Measure GEO-MM-1 for the Project.

As discussed in Response to Comment No. 35-91, Mitigation Measure GEO-MM-1 has been revised and now expressly includes elements from the mitigation program for other nearby projects, including the measures for LACMA (2019). In particular, Measure GEO-MM-1 now includes (a) a Worker Environmental Awareness Program Worker Environmental Awareness Program.

The mitigation measures for the Academy Museum of Motion Pictures (2015) were also reviewed since, much like LACMA, the Academy Museum of Motion Pictures is located just west of the La Brea Tar Pits and Museum. The measures for the Academy Museum of Motion Pictures (2015) require that a qualified paleontologist be retained with a minimum of five years of experience excavating asphaltic soils of Hancock Park. The qualified paleontologist would be approved and supervised by the Page Museum (now known as the La Brea Tar Pits and Museum) and supervise monitoring by a qualified paleontological monitor. The measures also provide that data regarding resource locations and stratigraphy be collected, and that recovered fossils would need to be processed, cataloged, and curated. The mitigation measures also list qualifications for the qualified paleontologist and qualified paleontological monitor, which match the revised mitigation measure (revised Mitigation Measure GEO-MM-1) for the Project. The mitigation measures for the Academy Museum of Motion Pictures (2015) also require the preparation of a Paleontological Resources Monitoring and Mitigation Plan, or PRMMP, subject to the approval by the City, the Page Museum (i.e., the La Brea Tar Pits and Museum, which is now provided in revised Mitigation Measure GEO-MM-1 for the Project), and the applicant. A WEAP is also required, which is included in the revised Mitigation Measure GEO-MM-1 for the Project.

Similarly, revised Mitigation Measure GEO-MM-1 in Response to Comment No. 35-91 is also consistent with the following mitigation measure elements from the Westside Subway Extension Mitigation and Monitoring and Reporting Plan (2012): retain the services of a Qualified Principal Paleontologist, development of a Paleontological Resources Mitigation and Treatment Plan required activities for recovered fossils in the Plan, preparation of a report on paleontological resources recovered, and curation of identified and prepared fossils.

Comment No. 26-E.2-21

Conclusion

Based on a review of the DEIR and technical appendices, SRI finds that the DEIR fails to adequately identify and analyze the effects of the TVC 2050 Project on cultural resources of the built environment, archaeological resources, tribal cultural resources, and paleontological resources. As provided above, the DEIR needs to be revised, including but not limited to an analysis of the effects on the viewshed of historical resources; an analysis of the effects of vibration from construction on historical resources; an analysis of cultural resources from the protohistoric and historical periods; additional identification efforts for archaeological, tribal, and paleontological resources; and a meaningful evaluation of appropriate mitigation measures.

Response to Comment No. 26-E.2-21

This comment concludes the main comment letter and summarizes the commenter's concerns addressed above. Specific issues raised by the commenter are addressed in Response to Comment Nos. 26-E.2-2 through 26-E.2-153. As demonstrated therein, the analysis in the Draft EIR meets the requirements of CEQA.

Comment No. 26-E.2-22**References Cited**

Eyestone Environmental

2019 Final Environmental Impact Report for the LACMA Building for the Permanent Collection. SCH No. 2016081014. Prepared by Eyestone Environmental.

Los Angeles City Planning Department, Environmental Review Section

2015 Final Environmental Impact Report for the Academy Museum of Motion Pictures Project. SCH No. 2013051086. Prepared by Environmental Review Section—Los Angeles City Planning Department.

Response to Comment No. 26-E.2-22

The references in this comment have been reviewed as part of the responses to the specific comments above that cite these documents. No individual response is necessary.

Comment No. 26-E.2-23

Comment Number	Section or Appendix	Page, Table, or Figure No.	Passage	Comment
1.	DEIR Section II Project Description	Page II-1	Entire Section	The Introduction on Page II-1 summarizes the goals of the project and specifies the maximum square footage of development excluding those facilities and spaces listed in Footnote 1. This same description was adapted for the TCR report and AB-52 Consultation Letter. Later in the Project Description on Page II-17 what follows, the DEIR specifies that much of the project site would be subject to a base height limit of 88 feet, consistent with the height of the existing HCM. However, Table II-3 on Page II-19 shows that allowable heights in significant portions of the

				project area will far exceed the 88-foot base height, with some construction having a maximum height of 225 feet above grade, which is 2.5 times the base-height limit. This is a significant feature of the proposed development and should be included in all of the cultural resource technical evaluations. The reports should be updated accordingly.
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Response to Comment No. 26-E.2-23

Regarding the assessment of archeological resources, which are assessed in Section IV.B, Cultural Resources, of the Draft EIR, the base height component of the Project description has no influence on the impact analysis, proposed mitigation measures, or the conclusions presented in the Draft EIR. Regarding the assessment of historic resources, the integrity of the Primary Studio Complex after implementation of the Project was thoroughly analyzed in Section IV.B, Cultural Resources, of the Draft EIR, and it was determined that the Primary Studio Complex would retain sufficient integrity to convey its historic significance. Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources.

Comment No. 26-E.2-24

2.	DEIR Section II—Project Description	Historic Preservation (Pages II-22 and II-23)	Discussion of historic preservation	Normally, historic preservation relates to cultural resources of all sorts, not simply built environment. This section, and the entire project description in general, does not discuss archaeological or tribal resources at all. The missing archaeological or tribal resources information and analysis should be added and the document recirculated.
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Response to Comment No. 26-E.2-24

Section II, Project Description, of the Draft EIR has been completed in full compliance with CEQA. The Project Description is not required to provide a discussion of archaeological or tribal cultural resources. These topics are appropriately addressed in Sections IV.B, Cultural Resources, and IV.L, Tribal Cultural Resources, respectively, of the Draft EIR. As this information is not absent from the Project Description, recirculation of the Draft EIR based on this comment is not warranted. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-25

3.	DEIR Section II	Figure II-4	Conceptual Site Plan	This is not very informative: no indication of where the Primary Studio Complex (the HCM) is located within this plan, where the new buildings are located, or the elevations of the buildings. It is unclear what project is being evaluated. Without more specificity, the analysis and impacts assessment is unsupported.
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Response to Comment No. 26-E.2-25

The Conceptual Site Plan provides key information to assist in the preparation of environmental analyses throughout the Draft EIR. The commenter fails to note that there are numerous other graphics included in the Draft EIR to support the various analyses. In particular, the Historic Report, which is provided as Appendix C.1 to the Draft EIR, contains numerous figures of the Primary Studio Complex that support the impacts analysis. Pages 55 to 56 therein show the removal of non-historic additions, pages 61 to 63 show areas that would be restored, page 70 shows additions, and page 73 shows adjacent new construction.

Comment No. 26-E.2-26

4.	DEIR Section II	Figure II-5	Height Zone Map	This indicates that the Primary Studio Complex will be surrounded on 3 sides by 13–22-story towers that would overwhelm the HCM. The map also indicates the north side of the HCM could be obscured by buildings and structures of 58 feet tall. This would clearly not preserve the integrity of the HCM, and the latter would have a significant impact on the viewshed restoration area.
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Response to Comment No. 26-E.2-26

Refer to Sections C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, as well as Response to Comment No. 26-E.2-6 regarding the Draft EIR's demonstration that impacts from Project buildout and new construction adjacent to the Primary Studio Complex would be less than significant.

The commenter is referred to the Height Zone Map in Figure II-5 of the Draft EIR that shows the correct building height limits and provides an envelope of building heights across the Project Site, further specifying that maximum heights in certain zones would be limited to a specific percentage. The Height Zone Map does not reflect the overall massing of the Project. As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

Comment No. 26-E.2-27

5.	DEIR Section II	Page II-12	At full buildout, the Specific Plan would permit a total of up to a maximum of 1,874,000 sq ft, but a retention of only up to 247,820 sq ft of existing buildings	This is more than twice the existing square footage and a sitewide floor area ratio of 1.75:1. This buildout can only be achieved by building high-rise towers that would overwhelm the Primary Studio Complex.
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Response to Comment No. 26-E.2-27

Refer to Sections C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, as well as Response to Comment No. 26-E.2-6 regarding the analysis of impacts to the Primary Studio Complex that accounts for building heights and demonstrates that potential impacts would be less than significant.

Comment No. 26-E.2-28

6.	DEIR Section II	Page II-22	First mention of exclusion from HCM of 1969 Service Building addition and 1976 Support Building and the period of significance between 1952 and 1963	Rationale for period of significance not presented here. These additions are now over 50 years old or will be by the time of project completion. Their exclusion from HCM must be considered more carefully and justified with more evidence. Why such a narrow period of significance for a complex that has been functioning for 70 years?
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Response to Comment No. 26-E.2-28

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for a detailed discussion regarding the period of significance that concluded in 1963.

Comment No. 26-E.2-29

7.	DEIR Section II	Page II-25	Discussion of proposed vehicular and pedestrian access.	Bicycles mentioned as a preferred vehicular form, but no discussion of any special bicycle access lanes or secure parking.
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Response to Comment No. 26-E.2-29

As indicated on pages IV.K-37 to IV.K-40 of Section IV.K, Transportation, of the Draft EIR, as part of Project Design Feature TR-PDF-2, the Project would implement a series of TDM measures that exceed the requirements established in the current TDM Ordinance. Included in Project Design Feature TR-PDF-2 is the following (refer to page IV.K-38 of the Draft EIR): “Project and Bicycle Parking and Amenities: In order to facilitate bicycle use, the Project will provide short-term and long-term bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC), as well as valet service, showers, lockers, and bicycle service areas and repair stands within the Project Site. The Project will incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Applicant will also contribute toward the implementation of bicycle improvements within the Study Area in accordance with the Mobility Plan.” Refer to Topical Response No. 11, Transportation Demand Management, for further discussion of the TDM Program.

Comment No. 26-E.2-30

8.	DEIR Section IV Environmental Impact Analysis	B. Cultural Resources, 1. Introduction	This section of the Draft EIR provides an analysis of the Project impacts to historical and archaeological resources. The analysis of historical resources is based on the Historical Resources Technical Report TVC 2050 Project (Historic Report) prepared by Historic Resources Group (HRG), and the analysis of archaeological resources is based on information within the Tribal Cultural Resources Report prepared by Dudek	The TCR report is not an archaeological resource report and cannot be used as the basis of analysis of archaeological resources. Sufficient information exists to know that the site has a very high likelihood for the presence of archaeological resources. An archaeological resources assessment must be completed, and the results included in a recirculated DEIR for public review and comment.
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Response to Comment No. 26-E.2-30

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the multiple data sources that were used identify substantial evidence in the analysis of archaeological resources within the Project Site, including but not limited to the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR).

Refer to Response to Comment No. 26-42 regarding the need for additional technical reports and availability of substantial evidence to inform the assessment of archaeological resources.

Refer to Response to Comment Nos. 13-7 and 26-42 on the likelihood for archaeological resources and the substantial evidence used to support the conclusions in the analysis as presented in Section IV.B, Cultural Resources, of the Draft EIR. This includes the results of the review presented in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-31

9.	DEIR Section IV Environmental Impact Analysis	B. Cultural Resources, Historic Period Overview, Page IV.B-32	Entire Section	This section is inadequate and includes no project-specific history to inform on historical use of the project area as it relates to the potential for archaeological resources. The section must be revised to include such information and the DEIR recirculated for public review and comment.
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Response to Comment No. 26-E.2-31

Refer to Response to Comment No. 26-42 regarding the considerations of historical land uses incorporated into the analysis of archaeological resources as discussed in Section IV.B, Cultural Resources, of the Draft EIR, and further assessed in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-32

10.	DEIR Section IV Environmental Impact Analysis	B. Cultural Resources, Page IV.B-34	As discussed in the Tribal Cultural Resources Report, while numerous historical period resources were	Rancho La Brea was founded in 1828 by Jose Antonio Rocha, constructed around 1852 by James Thompson, and modified in 1880 by
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			identified during the records search, no prehistoric archaeological resources or historical-period Native American resources were identified within the Project Site or within 0.5 mile of the Project Site.	A. F. Gilmore. It is not known if Thompson built the Adobe on the foundation of an earlier structure. The TCR does not consider if Native American labor was used to construct the original building or if Native Americans were used as domestic help or ranch hands at the Adobe and adjacent lands, which was common in the 1850s. The Adobe property is located approximately 130 feet from the project area. This is a significant omission in the understanding of the project site and the potential for the project to have significant impacts on cultural resources.
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Response to Comment No. 26-E.2-32

Refer to Response to Comment No. 26-42 regarding the consideration of historical context related to Rancho La Brea and the Gilmore Adobe and the means by which this was incorporated into the analysis of archaeological resources as discussed in Section IV.B, Cultural Resources, of the Draft EIR, and further assessed in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Refer to Response to Comment No. 26-E.2-12 regarding the subject of Native American labor in the construction of the Gilmore Adobe and the applicability of this to the analysis.

Comment No. 26-E.2-33

11.	DEIR Section IV Environmental Impact Analysis	B. Cultural Resources, Page IV.B-34–IV.B.35	<p>In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to cultural resources if it would:...</p> <p>Threshold (c): Disturb any human remains, including those interred outside of dedicated cemeteries.</p> <p>Threshold (c) was scoped out of the Draft EIR in the Initial Study, which is included in Appendix A of this Draft EIR. As demonstrated therein, impacts would be less than</p>	There is no discussion or justification presented for scoping this threshold out of the Draft EIR, given that archaeological resources are not adequately considered in the technical reports or the DEIR itself as highlighted herein.
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			significant, and no further analysis is required.	
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Response to Comment No. 26-E.2-33

Contrary to the assertion of the commenter, the Draft EIR does contain justification for why impacts related to human remains were scoped out in the Initial Study (included in Appendix A of the Draft EIR). As discussed on page VI-24 of Section VI, Other CEQA Considerations, of the Draft EIR, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on-site, the potential exists to uncover existing but undiscovered human remains. In the unlikely event human remains are discovered during Project construction, compliance with existing regulatory requirements would ensure appropriate treatment of any potential human remains. Specifically, if human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the discovery until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, as concluded in the Initial Study, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, Project impacts related to human remains would be less than significant. This information has been further summarized in the Supplemental Cultural Memo, included as Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo provides expert opinion reinforcing the conclusions that human remains are unlikely to be encountered and that compliance with existing regulations is sufficient to avoid potentially significant impacts in the unlikely event any human remains are discovered during Project construction.

Comment No. 26-E.2-34

12.	DEIR Section IV Environmental Impact	B. Cultural Resources, Analysis of	Threshold (b): Would the Project cause a substantial adverse change in the	The DEIR fails to consider known buried historical-period resources in the project area. Page 63 of CBS
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	Analysis	Project Impacts, Page IV.B-57	<p>significance of an archaeological resource pursuant to §15064.5?</p> <p>And discussion following.</p>	<p><i>Television City, Los Angeles Historic Resource Assessment</i> prepared by ARG in 2018 and part of Appendix C.A of the DEIR states:</p> <p>“Although the subject property has already been substantially excavated and graded as part of its development, it may contain intact subsurface deposits relating to historic occupations including Gilmore Field, Gilmore Stadium, the Gilmore Adobe of Rancho La Brea, and smaller properties like the drive in and gas station known to have been present prior to 1952.¹⁴⁵ The area is also known to have a high occurrence of subsurface paleontological deposits,¹⁴⁶ which are sometimes accompanied by archaeological deposits containing evidence of prehistoric human activity. Because a comprehensive archaeological assessment was not included in the scope of this report, the property’s potential to yield information important in prehistory or history is currently unknown.</p> <p>According to Footnote 145 in this passage, remnants of Gilmore Field dugouts were encountered during excavation for the East Studies Building in 1991. This clearly demonstrates that buried historical-period archaeological remains are present in the project area.</p> <p>Identification efforts for archaeological resources failed to consider buried deposits from development and activities prior to 1952. Archaeological monitoring during grading is an appropriate mitigation measure for identifying and treating unanticipated resources but should not be used in lieu of active searching when there is a very high likelihood for buried resources to be present. Given the very high likelihood for buried resources, a geoarchaeological study should have been completed. This level of study, which was not conducted here, is required by CEQA during the EIR preparation process, and the methods, results,</p>
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				and recommendations from that research should be documented in an archaeological resources report.
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Response to Comment No. 26-E.2-34

Regarding the assessment of buried historical-period resources, Response to Comments Nos. 13-7, 26-42, and 26-44 address the identification and analysis for archaeological resources from all time periods that could be preserved below ground. Response to Comment No. 26-42 specifically addresses historical land uses and how information including but not limited to the content in ARG's Historic Resource Assessment was already considered in the analysis. This information has been further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo also includes additional clarifications on why the resources described in the Draft EIR as being most likely to occur are unlikely to be considered historical resources under CEQA, and upon further review did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the issue of the historic context and the adequacy of the identification and analysis of archaeological and tribal cultural resources, including those associated with the Gilmore Adobe, and the various business ventures pursued by the Gilmore family—oil operations, Gilmore Field, and Gilmore Stadium. These are also further summarized as part of Response to Comment No. 26-E.2-15.

Refer to Response to Comment No. 26-44 regarding how the provisions put forward in Mitigation Measure CUL-MM-1 provide an adequate means of reducing potentially significant impacts to archaeological resources. Response to Comment No. 26-44 also provides further clarification regarding the meaning of unanticipated resources and the relationship to the assessment of potential impacts to archaeological sites and how the proposed mitigation avoids or reduces potentially significant impacts. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, adds further detail to the analysis of buried resources, use of archival data, and adequacy of Mitigation Measure CUL-MM-1; the conclusion stated therein further reinforces the findings presented in the Draft EIR. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

In addition to the topics referenced above regarding the analysis of archaeological addressed, refer to Response to Comment No. 26-42 specifically regarding the level of study required to support an analysis under CEQA.

Comment No. 26-E.2-35

13.	DEIR Section IV Environmental Impact Analysis	B. Cultural Resources, Project Impacts with Long Term Buildout Page IV.B-59	While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043...Additionally, given that historic and archaeological resources are site-specific and do not typically vary over the course of a 20-year timeframe, a later buildout date would not affect the impacts or significance conclusions presented above	We disagree with the statement that “a later buildout date would not affect the impacts or significance conclusions presented above.” To qualify for eligibility to the CRHR, resources generally need to be at least 50 years old in order to understand the historic importance of a resource, because sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. Given the 20-year time frame for buildout of the proposed project, resources that are today too young to be placed in the proper perspective might be considered eligible in the future. The DEIR must include a mechanism for future evaluation of cultural resources prior to their alteration or destruction.
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Response to Comment No. 26-E.2-35

The proposed Specific Plan includes a provision that prior to the demolition or alteration of any building over 45 years old that has not already been designated as a historical resource, written verification from the Office of Historic Resources that the building is not an historical resource under CEQA or an HCM under the City’s code shall be required. Thus, the mechanism suggested by the Commenter has been incorporated.

Comment No. 26-E.2-36

14.	DEIR Section IV.B Cultural Resources	Pages IV.B-1–IV.B-16	Discussion of pertinent federal, state, and local regulations	<p>This DEIR section goes into tremendously more detail than the Tribal Cultural Resources Report on applicable regulations. One has to wonder which of these regulations discussed in the DEIR were not taken into account in the technical report analysis. For example, the Tribal Cultural Resources Report did not discuss the City of Los Angeles CEQA Thresholds, as the DEIR does.</p> <p>One also has to wonder why certain federal regulations are being discussed in the DEIR. Is there a federal nexus that has not been made clear? Is there federal money</p>
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				being used in the project? Why is the DEIR discussing acts like the Archaeological Resources Protection Act (ARPA), which only applies to federal land? Why is the Native American Graves Protection and Repatriation Act (NAGPRA) being discussed at all in a California-based DEIR? If federal NAGPRA is being discussed, should Cal NAGPRA also be discussed?
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Response to Comment No. 26-E.2-36

The Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR provides a summary of the regulations pertinent to the analysis of tribal cultural resources. The section of the report discussing the regulatory framework is not intended to be an exhaustive analysis of regulations. Such an analysis is provided in the Draft EIR on pages IV.B-1 through IV.B-16 in Section IV.B, Cultural Resources, of the Draft EIR, and pages IV.L-1 through IV.L-4 in Section IV.L, Tribal Cultural Resources, of the Draft EIR. There is no evidence that the tribal cultural resource analysis did not follow the applicable regulations; rather, the evidence confirms that the Tribal Cultural Resources Report adheres to professional standards and provides substantial evidence to support the conclusions in accordance with Appendix G of the CEQA Guidelines. As the City of Los Angeles CEQA Thresholds were published in 2006 before the category of tribal cultural resources was created in the CEQA Guidelines, the discussion of tribal cultural resources is omitted and the 2006 L.A. CEQA Thresholds Guide refers exclusively to archaeological resources. As such, the City of Los Angeles CEQA Thresholds are included in Section IV.B, Cultural Resources, of the Draft EIR.

Regarding the inclusion of federal regulations in Section IV.B, Cultural Resources, of the Draft EIR, there is not a federal nexus for the proposed Project or a federal funding source. The inclusion of the Archaeological Resources Protection Act (ARPA) and the Native American Graves Protection and Repatriation Act (NAGPRA) are not directly applicable, but their inclusion does not invalidate the findings otherwise presented. References to both of these regulations are not repeated in the analysis sections below, which otherwise focus on the application of state and City regulations and guidelines. As with the inclusion of federal regulations such as the National Register of Historic Places (NRHP), which have relevance in CEQA because of the relationship to the California Register of Historical Resources (CRHR) criteria, among other topics, the federal regulations can sometimes provide reasonable guidance or standards where an equivalent state or local regulation is absent.

Regarding the applicability of Cal NAGPRA, this regulation applies to state agencies and museums who have possession or control over collections of Native American human remains or cultural items and requires them to provide a process for the identification and repatriation of these items to the appropriate tribes. Any discovery of Native American human remains would be subject to the process defined by the California Health and Safety Code Section 7050.5 and PRC Section 5097.98, which requires coordination with the NAHC and designation of a Most Likely Descendant, and only as a part of this process would the treatment and disposition of any human remains and any associated items be determined.

Comment No. 26-E.2-37

15.	DEIR Section IV.B Cultural Resources	Page IV.B-57	Discussion of Threshold (b): Would the Project cause a substantial adverse change in the significance of an archaeological resource?	<p>The underlying data for answering this question comes from the Tribal Cultural Resources Report. That work apparently did not involve a pedestrian survey of the property and relied on AB-52 consultation, rather than also contacting tribes listed by the NAHC as having potential knowledge of sacred lands in the vicinity of the Project area. Why? The pedestrian survey and contact of tribes should be completed. There may also be the potential for buried resources based upon filled-in natural drainages within the project area.</p> <p>While the DEIR does state that due to ground-disturbing activity, there is the potential for encountering unknown archaeological resources within the Project area, additional investigation is warranted.</p>
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Response to Comment No. 26-E.2-37

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the multiple data sources, that were used identify substantial evidence in the analysis of archaeological resources within the Project Site and the potential for impacts, which includes but is not limited to the use of the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR).

Refer to Response to Comment No. 26-42 regarding the justification for not conducting an additional pedestrian survey and the methodology used to characterize the existing conditions within the Project Site, including but not limited to assessing the potential for resources buried in former drainages or any other location within the Project Site.

Refer to Response to Comment No. 26-E.2-14 regarding the efforts made to contact tribes for information on sacred lands pursuant to the NAHC's recommendations.

Comment No. 26-E.2-38

16.	DEIR Section IV.B Cultural Resources	Pages IV.B-31 and IV.B-55–IV.B-57	Potential Impacts to Historical Resources in the Project Site vicinity	<p>The draft EIR states that other historical resources in the project site vicinity—the Original Farmers Market, Rancho La Brea Adobe, Chase Bank, Fairfax Theater, Air Raid Siren No. 25, and the Beverly Fairfax Historic District—would not be adversely affected by project construction, in terms of their visual and spatial relationships with their immediate surroundings.</p> <p>Considering the heights of proposed new construction (between 160 and 225 feet above project grade) and in the absence of a visual-resource, or viewshed, analysis study, these assumptions are unsupported and suspect. Given the acknowledged transportation impacts to the Beverly Fairfax Historic District, these assumptions are unsupported and suspect. Additionally, the Miracle Mile North Historic Preservation Overlay Zone (HPOZ) lies immediately east of Pan Pacific Park. There is the potential for adverse visual effects to this HPOZ and a change in setting, feeling, and association. Impacts to this HPOZ should be added to the analysis and the DEIR recirculated.</p>
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Response to Comment No. 26-E.2-38

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Project's less-than-significant impacts to historical resources in the Project Site vicinity and aesthetics impacts. Also refer to Response to Comment No. 26-E.2-6 for a discussion of the safeguards and other development standards that will prevent an unrestricted buildout scenario that would impact historical resources in the vicinity of the Project Site.

As discussed in Section IV.K, Transportation, of the Draft EIR, the Project would not result in significant transportation impacts to the Beverly Fairfax Historic District or any other geographic area under CEQA.

In response to concerns about impacts to the Miracle Mile North HPOZ that might amount to a change in setting, feeling, or association of the HPOZ, Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, also explains that a thorough analysis was conducted of potential impacts to historical resources in the vicinity of the Project Site. As discussed on page IV.B-27 of the Draft EIR, the Historic Report (Appendix C.1 of the Draft EIR) defines an area surrounding the Project Site where potential direct or indirect impacts could reasonably be expected to occur (i.e., the Project Site vicinity). In determining the Project Site vicinity, the Historic Report considered three factors: (1) the existing setting of the Project Site; (2) the scale and nature of the proposed Project; and (3) the impacts the Project could have on historical resources, if such resources exist. The Historic Report defined the Project Site vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Properties beyond the Project Site vicinity were not analyzed because the Project would have no potential to directly or indirectly impact those properties. The western boundary of the Miracle Mile North HPOZ sits more than 800 feet from the easternmost edge of the Project Site and cannot be reasonably considered to be part of its environmental setting under CEQA, nor is there any potential for significant impacts to the Miracle Mile North HPOZ from the Project. Therefore, impacts to the Miracle Mile North HPOZ were not analyzed as part of the Draft EIR.

Further, this comment does not demonstrate how the visibility of new construction would result in a substantial adverse change such that the physical characteristics of any historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, historic listing would be materially impaired. As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, the mere visibility of a new building, structure, or feature from various vantage points alone would not result in a significant impact to any of the historic resources located in the vicinity of the Project Site. For a significant impact to occur, the integrity of the historical resource would have to be diminished to the degree that it would no longer be able to convey its significance.¹¹² The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the historical resources in the vicinity, including their integrity of *setting*, and concluded that any impacts would be less than significant.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

¹¹² CEQA Guidelines Section 15064.5(b)(2).

Comment No. 26-E.2-39

17.	DEIR Section IV.B Cultural Resources	Page B-19	Again 1969 expansion of Service Building and 1976 Support Building excluded from HCM	No rationale for their exclusion presented here either. See other information regarding artificial exclusion of resources.
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Response to Comment No. 26-E.2-39

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the HCM nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the 1976 Support Building and any other buildings and structures constructed after 1963 were not included in the designation. It is incorrect to say that “no rationale” was presented. The year of 1963 was selected as the end date because that is the year CBS ended its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City. The period of significance also captures the maturation of commercial television in the post–World War II period. Furthermore, in preparing the Historic Report (Appendix C.1 of the Draft EIR), HRG reviewed all of the relevant material for consistency with industry standards and determined that the period of significance was appropriate.

Comment No. 26-E.2-40

18.	DEIR Section IV.B Cultural Resources	Page B-21	The attached Support Building, which was constructed on the west side of the Studio Building in 1976, and the three story, detached East Studio Building constructed in 1993, are not a part of the original Primary Studio Complex and are not included as part of the HCM designation	Simply excluding them because they are not part of the original complex is insufficient rationale. An assessment of their significance must be included and the DEIR recirculated.
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Response to Comment No. 26-E.2-40

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the HCM nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the

1976 Support Building and any other buildings and structures constructed after 1963 were not included in the designation.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-41

19.	DEIR Section IV.B Cultural Resources	Page B-22	The Primary Studio Complex is primarily accessed by a distinctive bridge that spans the sunken plaza,	When was this bridge constructed, and is it part of the HCM? Additional information should be included and the DEIR recirculated.
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Response to Comment No. 26-E.2-41

The central concrete entry bridge was included in the original 1952 design of the Primary Studio Complex and, as stated in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), is included as a character-defining feature of the Primary Studio Complex in the HCM designation. The bridge is discussed on page IV.B-22 of the Draft EIR, which states that “the Primary Studio Complex is primarily accessed by a distinctive bridge that spans the sunken plaza, terminating on the concourse at a point between the Studio Building and Service Building. This concrete bridge is supported by tall, angled, steel pipe ‘X’ supports, which extend through the center of the bridge to a flat canopy of corrugated steel decking with a T-shaped plan. The north end of the canopy bears signage reading ‘TELEVISION CITY.’ The bridge has low walls of corrugated steel topped by metal pipe handrails with angled fin stanchions. The north end of the bridge has low corrugated steel planters. Landscaped areas and a small water feature sit below the bridge’s south end where it meets the Primary Studio Complex.” Photographs of the bridge are included in Appendix A of the Historic Report. The Project would preserve all character-defining features of the Primary Studio Complex, including the bridge.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-42

20.	DEIR Section IV.B Cultural	Page B-23	The Project Site contains approximately 30 ancillary	When were these buildings constructed? Additional information
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	Resources		buildings and structures	is necessary to assess their significance.
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Response to Comment No. 26-E.2-42

The existing ancillary buildings are discussed on page IV.B-23 in Section IV.B, Cultural Resources, of the Draft EIR. As stated therein, the Project Site contains approximately 30 (temporary and permanent) ancillary buildings and structures, in addition to other structures including equipment pads, carports with solar panels, and satellite dishes. The largest ancillary buildings are storage warehouses clustered in the southeast portion of the Project Site. These storage warehouses are one-story rectangular buildings with low pitched gabled roofs and corrugated metal wall cladding. Temporary one-story studio bungalows are located adjacent to the east and south sides of the Primary Studio Complex. Several of the bungalows are attached to each other, creating long, rectangular footprints. Temporary bungalows of a different type are found in a four-building cluster in the southeast portion of the Project Site. The temporary bungalows are one-story modular buildings which were repurposed as production offices. As stated on page IV.B-42 of the Draft EIR, all of these buildings and structures were constructed after the period of significance associated with the Primary Studio Complex, have not been identified as historically significant contributing elements of the property, and are not considered historical resources. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 for additional information regarding the preservation of the Primary Studio Complex.

Comment No. 26-E.2-43

21.	DEIR Section IV.B Cultural Resources	Page B-23	The Primary Studio Complex was formally designated as HCM No. 1167 on June 26, 2018 (CHC-2018-476-HCM). According to the HCM adoption resolution, the HCM is limited to: (1) the original 1952 Service Building; (2) the original 1952 Studio Building; (3) the enclosure of the Service Building's north façade in 1959; and (4) the addition of a small compressor room to that building's east façade.	Actually, this designation was made by Cultural Heritage Commission on May 3, 2018, and was formalized in a letter dated May 22. Limitations are as follows: The CBS Television City proposed Historic-Cultural Monument is limited to the exterior of the original 1952 buildings (the "Studio Building" on the west, and the "Service Building" on the east) and the CBS logo tiles in the main entry lobby and adjacent corridor. No mention is made of the 1959 building, compressor room, or the 1952–1963 period of significance (see Appendix C, pg. 133).
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Response to Comment No. 26-E.2-43

The Cultural Heritage Commission does not designate HCMs; rather, the Cultural Heritage Commission makes recommendations for their designation to the decision-making body, the City Council. As such, the City Council designated the Primary Studio Complex as an HCM on June 26, 2018, as correctly stated in the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR). Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for a detailed discussion of the formal designation of the Primary Studio Complex.

Comment No. 26-E.2-44

22.	DEIR Section IV.B Cultural Resources	Page B-24	Evaluation of Significance	Did the studio's function change after 1963?
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Response to Comment No. 26-E.2-44

Television City has been a studio since its original construction in 1952. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the period of significance determined for Television City. As discussed therein, the period of significance for Television City was defined as 1952 to 1963, beginning with the year the original Primary Studio Complex was constructed and ending with the year that CBS abandoned its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City.

Comment No. 26-E.2-45

23.	DEIR Section IV.B Cultural Resources	Page B-24	The 1969 and 1976 additions are architecturally compatible with the Primary Studio Complex, but do not reflect functional adherence to Pereira & Luckman's original master plan for the Project Site.	The additions are compatible, but how do they depart from the original master plan?
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Response to Comment No. 26-E.2-45

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the evaluation and designation of the Television City Property. As explained therein, the original master plan for Television City—a seminal design by the

lauded architectural firm of William Pereira and Charles Luckman—represented state-of-the-art thinking regarding television production as it was understood in the early 1950s. Significant to its design was the “intentional divergence from the familiar film studio property type” traditionally conceived as a disparate collection of individual building types and sets arranged on a large walled lot. Instead, Television City was conceived as a single, integrated, and self-contained building complex.

As explained in the 2018 Historic Resource Assessment (attached to the Historic Report in Appendix C.1 of the Draft EIR), the utility of specialized, purpose-built television production facilities had come into question by the late 1950s, as pre-filmed television production overcame the live and taped methods that purpose-built facilities like Television City were optimized for. By 1963, CBS had abandoned its original concept for Television City and became the primary tenant of the former Republic Pictures film studio lot in Studio City, changing its name to CBS Studio Center and moving its filmed production there. Thus, the additions made after 1963 were no longer intended to follow the original master plan for Television City.

Comment No. 26-E.2-46

24.	DEIR Section IV.B Cultural Resources	Page B-24	the East Studio Building is not clearly associated with the historical pattern of development of Television City, and sufficient time has not passed in order to have a scholarly perspective on its potential historical significance	This may be acceptable for a building constructed in 1993, but why is there no scholarly perspective on the potential historical significance of the 1969 and 1976 additions for which sufficient time has passed?
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Response to Comment No. 26-E.2-46

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding why 1963 is the appropriate end date for the period of significance based on extensive research by technical experts and the correct application of evaluation criteria.

Comment No. 26-E.2-47

25.	DEIR Section IV.B Cultural Resources	Page B-42	As part of the rehabilitation of the Primary Studio Complex, the 1976 Support Building located on the west side of the Primary Studio Complex may be demolished. The 1969 Mill Addition on the east side of the Primary Studio	The significance of the 1969 and 1976 additions have not been considered, but these buildings have been summarily excluded as historic resources even though they are within the historical period. Assessment of the significance of these buildings and the impacts of
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			Complex may also be demolished. The Support Building and the Mill Addition were constructed after the period of significance, have not been identified as historically significant contributing elements of the property, and are not considered historical resources. The removal of these buildings would not materially impair the historic significance and integrity of the Primary Studio Complex.	the project to them must be included and the DEIR recirculated.
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Response to Comment No. 26-E.2-47

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. As discussed therein, the HCM nomination identified the 1952 Primary Studio Complex (including alterations through 1963) as eligible for designation. The 1969 Mill Addition, the 1976 Support Building and any other buildings and structures constructed after 1963 were not included in the designation. Thus, these additions were in fact considered but rejected as character-defining features of the Primary Studio Complex based upon extensive research and the appropriate application of criteria for listing as an historic resource by technical experts. Furthermore, in preparing the Historic Report, HRG reviewed all of the relevant material for consistency with industry standards and determined that the period of significance was appropriate.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-48

26.	DEIR Section IV.B Cultural Resources	Page B-42	The demolition of the portion of the Service Building south of the three-story office portion would remove some original material and alter the building's overall form and volume.	The plan is to demolish over half of this building, which is considered a historic resource. Why is demolition necessary? This is a significant impact that would severely damage the integrity of the Service Building and the HCM. Were alternatives to retain the full building evaluated?
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Response to Comment No. 26-E.2-48

Refer to Response to Comment No. 26-46 for a discussion of how the demolition of the south façade of the Service Building would only minorly affect the integrity of the Service Building and would improve the integrity of the Primary Studio Complex overall. The Draft EIR correctly concluded that the Project would have a less-than-significant impact on the Primary Studio Complex.

The alternatives analysis in Section V, Alternatives, of the Draft EIR included an alternative that did not involve any demolition; refer to the analysis of Alternative 2, Development in Accordance with Existing Zoning Alternative, beginning on page V-32 of the Draft EIR. As discussed on pages V-37 to V-38 of the Draft EIR, like the Project, Alternative 2 would result in less-than-significant impacts with respect to historical resources. Such impacts would be less than the less-than-significant impacts of the Project as no demolition activities would occur. However, the Project benefits relating to the HCM would not be achieved under Alternative 2. Specifically, the Primary Studio Complex would not be rehabilitated, and the currently compromised character-defining features, as well as the visibility and prominence of the Primary Studio Complex from Beverly Boulevard, would not be restored.

Comment No. 26-E.2-49

27.	DEIR Section IV.B Cultural Resources	Page B-42	Despite some loss of integrity by removing the southern portion of the Service Building, on balance, the integrity of the Primary Studio Complex would be improved overall.	This is a specious argument. There is no support for the conclusion. Removal of over half of the buildings appears to be a significant impact. Additional assessment is required and should be included in a recirculated DEIR.
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Response to Comment No. 26-E.2-49

Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the preservation of the Primary Studio Complex. Also, refer to Response to Comment No. 26-46 regarding the analysis of impacts from demolition of the southern portion of the Service Building. As discussed therein, removal of the southern portion of the Service Building would be counterbalanced by the removal of the 1976 Support Building, which would restore the original form and volume of the Studio Building and restore and reveal its original west wall. Because the majority of the original volume of the Studio Building would be restored, the overall form and volume of the original Primary Studio Complex would be improved as compared to existing conditions.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-50

28.	DEIR Section IV.B Cultural Resources	Page B-52	The Primary Studio Complex is significant under National Register Criterion A, California Register Criterion 1, and Los Angeles HCM Criterion 1 for its association with the television industry and its significant role in the economic development of Los Angeles. The Primary Studio Complex is also eligible under National Register Criterion C, California Register Criterion 3 and Los Angeles HCM Criterion 3 as an excellent example of an International Style television broadcasting studio and as a significant work of master architects Pereira & Luckman. It was also found eligible under Los Angeles HCM Criterion 2 for its association with important persons in the television and entertainment industry. The period of significance for the Primary Studio Complex has been defined as 1952-1963.	Why are the 1969 and 1976 buildings excluded as they are also eligible under Criterion A/1/1, Criterion C/3/3 and LA HCM Criterion 2. They weren't designed by Pereira & Luckman, but by one of their associates, who was also a master architect and participated in original construction (see Historic Resources Assessment).
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Response to Comment No. 26-E.2-50

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance determined for Television City. Also refer to Response to Comment No. 26-41 regarding Gin Wong and Associates who designed the non-historic 1976 Support Building and 1992 East Studio Building.

Comment No. 26-E.2-51

29,	DEIR Section IV.B Cultural Resources	Page B-58	Given that the Project would include excavations to a maximum depth of approximately 45 feet below	Appendix F clearly points to the likelihood of finding paleontological resources and calls for a paleontological mitigation plan. Why
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			ground surface, there may be a potential to encounter unknown archaeological resources that could be present at the Project Site.	is it not included as mitigation measure here?
30.	DEIR Section IV.D Geology and Soils	Page IV.D-6	(e) California PRC Section 5097.5	Given that this Project is on private property, why would PRC 5097.5 apply in this case? The section cited indicates that the law only applies to archaeology and paleontology located on public lands.

Response to Comment No. 26-E.2-51

Refer to Response to Comment Nos. 13-7 and 26-42 regarding archaeological resources and revised Mitigation Measure CUL-MM-1.

Public Resources Code Section 5097.5 (b) states: “As used in this section, ‘public lands’ means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.” As the Project Site is under the jurisdiction of the City of Los Angeles, this section is applicable to the Project.

Comment No. 26-E.2-52

31.	DEIR Section IV.L. Tribal Cultural Resources	L. Tribal Cultural Resources	Entire document	The tribal Cultural Resources section of the DEIR suffers from many of the same deficiencies noted for the TCR report.
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Response to Comment No. 26-E.2-52

This comment generally references an overall deficiency of Section IV.L, Tribal Cultural Resources, of the Draft EIR but does not specify any specific deficiencies. Specific issues raised by the commenter are addressed in Response to Comment Nos. 26-E.2-53 through 26-E.2-134, below.

Comment No. 26-E.2-53

32.	DEIR Section IV.L. Tribal Cultural Resources	Pages IV.L-1–IV.L-2	Discussion of AB-52	Given that this Project intends to create a Specific Plan, does SB-18 also apply in this case? There is no mention of SB-18 in this document. Has the project complied with SB-18?
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Response to Comment No. 26-E.2-53

Refer to Response to Comment No. 26-E.2-17 regarding the exemption from SB 18.

Comment No. 26-E.2-54

33.	DEIR Section IV.L. Tribal Cultural Resources	Page IV.L-9	AB 52 Consultation	Given the pandemic, one has to wonder if simply sending letters and receiving no response was sufficient to receive input from tribes. No tribes based on the Sacred Lands File search were contacted by the contractor, although the NAHC recommended doing so.
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Response to Comment No. 26-E.2-54

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the tribal outreach efforts completed for the Project, including notification to individuals on the NAHC contact list returned with the SLF results, and the Project's compliance with PRC Section 21080.3.1, as amended by AB 52, which was fulfilled by sending written notification through the U.S. Post Office via certified mail to tribes on July 21, 2021. An executive order was signed by Governor Newsom on April 22, 2020 that temporarily suspended the requirement for tribes to respond to AB 52 notification letters within the 30 days because of the impacts from COVID-19, which allowed for additional time for responses to be sent. This order had elapsed by the time the notification letters were submitted for the Project, but a period beyond the 30-day minimum had elapsed in which no responses were received, and allowed for a similar measure of extended response time for any on-going difficulties potentially presented by the pandemic. Therefore, no further steps were required to fulfill the tribal consultation requirements under PRC Section 21080.3.1.

Comment No. 26-E.2-55

34.	DEIR Section IV.L. Tribal Cultural Resources	Page IV.L-11	CA-LAN-003045H is documented as a historic site consisting of the Gilmore Adobe, built in 1852	Construction of TVC 2050 will require a large amount of over-excavation and this adobe structure is within 130 feet of the project boundary. How will vibration from construction affect the integrity of the structure?
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Response to Comment No. 26-E.2-55

Refer to Response to Comment No. 26-139 for a discussion of the Gilmore Adobe. As discussed therein, impacts would be less than significant.

Comment No. 26-E.2-56

35.	DEIR Section IV.L. Tribal Cultural Resources	Pages IV.L-12–IV.L-13	Sacred Lands File Review	Much like the technical report, this section does not mention that the normal language in NAHC Sacred Lands File review result letters state that even if no sacred lands are identified in their files for the project area, this does not preclude that there may be one present; this is why the NAHC recommends contacting the tribes on the attached list. Was contact made with those tribes during the process? If not, why?
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Response to Comment No. 26-E.2-56

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the steps taken to contact tribal parties, including notification to tribes who were on the NAHC's contact list returned with the SLF search results. None of the tribes who were sent notification letters responded, and having satisfied the requirements of PRC Section 21080.3.1, no additional outreach by the City was required.

Comment No. 26-E.2-57

36.	DEIR Section IV.L. Tribal Cultural Resources	Page L-7	The largest and best documented ethnographic Tongva village in the region was that of Yanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of downtown Los Angeles.	This, like much of the historical and prehistoric background, is very limited and out of date. Archaeological research at Guaspet provides much better documentation of Tongva history and archaeology than does Yanga, and it is equidistant from the project area. Furthermore, there is no discussion here of Native American land use of the project area and what types of sites or archaeological resources might be expected. This information should be included in a recirculated DEIR.
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Response to Comment No. 26-E.2-57

Refer to Response to Comments Nos. 13-7 and 26-42 regarding the adequacy of the discussion of the historical and prehistory background, including Native American land uses and the types of archaeological resources expected.

Regarding the discussion of Gabrielino or Tongva history and archaeology in Section IV.L, Tribal Cultural Resources, of the Draft EIR, a discussion of Guaspet would add to the background information already presented, which includes the reference to Yaangna (also spelled Yanga and Yangna), but the omission does not make the background information deficient as a means of conveying that significant Gabrielino sites and settlements have been documented in the Los Angeles Basin. While certain sites and settlements were elaborated upon in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and the City of Los Angeles Ethnographic Overview subsection in Section IV.L, Tribal Cultural Resources, of the Draft EIR, Guaspet and many of the other settlements in the region are represented in the map on page 41 in the Tribal Cultural Resources Report. The background information presented in Section IV.L, Tribal Cultural Resources, of the Draft EIR provides a reasonable characterization of the Gabrielino cultural history for the Los Angeles Basin for purposes of analyzing tribal cultural resources under CEQA.

The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional detail on the consideration of Native American land uses and expert opinion confirming that the level of detail included in the Draft EIR was adequate for purposes of characterizing the cultural setting for the Project Site.

Comment No. 26-E.2-58

37.	DEIR Section IV.L. Tribal Cultural Resources	Page L-11	CA-LAN-003045H is documented as a historic site consisting of the Gilmore Adobe, built in 1852	Totally inadequate historical-period discussion of project area. Who actually built this Adobe? Was it part of a Hispanic or Anglo ranch? Who was Gilmore, and when did he arrive in area? Did he actually build the Adobe? What was the Rancho La Brea that was mentioned here? Was it a Spanish Land Grant? What land use was the Adobe associated with? Again, there is no discussion of early historical (post-Native American) land use of the project area or record of ownership.
38.	DEIR Section IV.L. Tribal Cultural Resources	Page L-11	The Gilmore Adobe was in use until 1880.	Additional information should be included regarding the status of this building, its current use, condition, etc.

Response to Comment No. 26-E.2-58

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the discussion of the historical context, including background on Rancho La Brea, the Gilmore Adobe, the role of the Gilmore family, nineteenth and twentieth century land uses, and their

relevance to the analysis of tribal cultural resources. The commenter is responding specifically to the mention of CA-LAN-3045H as part of the CHRIS records search results presented in Section IV.L, Tribal Cultural Resources, of the Draft EIR. Noting that a historic-period site lacking any Native American components was in the CHRIS records search results supports the conclusion that tribal cultural resources are unlikely to occur. Most of these topics are relevant to the discussion of archaeological resources and are addressed as such in the same responses to comment referenced above. The consideration of historical land uses in the assessment of tribal cultural resources was specifically considered in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR), which expands upon the information on existing conditions presented in pages IV.B-16 through IV.B-34, IV.B-57, and IV.B-58 in Section IV.B, Cultural Resources, of the Draft EIR. Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 summarize how these were considered in the Draft EIR.

The Tribal Cultural Resources Report includes at least three other places in which historical land uses are considered in the analysis. Firstly, in the discussion of the Environmental Setting and Current Conditions on pages 11–12, the report notes the development of Television City in 1952 and that its development has been the predominant land use since its creation. Secondly, in the section describing the CHRIS records search results on pages 23–28, the Tribal Cultural Resources Report summarizes the previously recorded resources that contained archaeological evidence of the twentieth century historical land uses. Thirdly, on pages 28–29, the Tribal Cultural Resources Report provides a review of historical maps and aerial photographs. The information in the Preliminary Geotechnical Engineering Investigation provided in Appendix E.1 of the Draft EIR that identified fill soils above native soils was also factored into the final analysis of tribal cultural resources. Based on the information presented in the Tribal Cultural Resources Report, the analysis found sufficient evidence to support the following conclusion:

The history of past disturbance within and in the vicinity of the Project Site, as reflected by the records searches, review of historical topographic maps and aerial photographs, and the subsurface exploratory boring investigations, suggest that subsurface soils are unlikely to support intact TCRs. (page 43)

For purposes of analyzing the potential for impacts to tribal cultural resources, the Tribal Cultural Resources Report includes an adequate level of detail describing the historical context for the Project Site. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, further reinforces the findings of the impact analysis presented in the Draft EIR and Tribal Cultural Resources Report.

Comment No. 26-E.2-59

39.	DEIR Section IV.L. Tribal Cultural Resources	Page L-11	The property was subsequently used as a dairy farm until 1904, when oil drilling and refining procedures began.	No context is presented for the dairy or oil industry in the project area. Can we expect any associated archaeological materials? Sounds like they are likely to be present.
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Response to Comment No. 26-E.2-59

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the discussion of the historical land uses, including operation of the dairy and oil extraction and processing, and the relationship to archaeological resources potentially present. These responses include reference to the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo further summarizes the historical land uses and did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-60

40.	DEIR Section IV.L. Tribal Cultural Resources	Page L-11	According to the map, the Project Site is not situated within close proximity to any mapped village sites	What exactly does “within close proximity mean”? Are there any Native American sites anywhere close or in proximity; that is, beyond 0.5 miles of the project area? Where is the nearest recorded site or group of sites? Sole dependence on the Kirkman-Harriman Historical Map is completely inadequate. There are other resources available. Additional information is required here.
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Response to Comment No. 26-E.2-60

Regarding the reference to village sites not being mapped in “close proximity,” the use was intended in a colloquial sense of a non-specific geographical distance. This was stated in a good-faith effort to describe the visual assessment of multiple maps, which contain subtle variations that are difficult to precisely convey in narrative form. Specifically, the statement is made in the context of the maps cited in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The 1938 Kirkman-Harriman Historical Map was specifically referenced on page IV.L-11 in Section IV.L, Tribal Cultural Resources, of the Draft EIR. However, the discussion of existing conditions draws upon the results of the analysis from the Tribal Cultural Resources Report, which includes the Kirkman-Harriman Historical Map and two additional maps that show the locations of Native American settlements and sites. Including copies of these maps in the report visually conveys that

none of those sites are plotted within the Project Site or in a reasonable distance, hence within close proximity. The meaning of this phrase in the context of the Ethnographic Research and Review of Academic Literature subsection was also meant to convey that the distances from the Project Site to any of these village locations was not close enough to warrant further consideration. As mentioned here, other maps and several other sources were used to inform the tribal cultural resources analysis. Refer to Response to Comment Nos. 13-7 and 26-42 for a summary of the efforts made to obtain substantial evidence used to assess the potential for tribal cultural resources within the Project Site. These responses also provide an explanation for why the available evidence presented in multiple data sources were sufficiently detailed to provide a reasonable characterization of the existing conditions and the types of resources most likely to be encountered.

Regarding the question of sites being located beyond a 0.5-mile radius, as mentioned in the above response, several of the maps note the presence of sites in the region even if they are not all specifically referenced in this section. Refer to Response to Comment No. 13-7 on the mention of the site at the La Brea Tar Pits, and Response to Comment No. 26-E.2-57 on the village of Yaangna, which are both sites located outside a 0.5-mile radius of the Project Site.

Comment No. 26-E.2-61

41.	DEIR Section IV.L. Tribal Cultural Resources	Page L-16	Based on this information, the City, in its discretion and supported by substantial evidence, finds that the Project Site does not contain any known or reasonably foreseeable resources determined by the City to be significant	While a monitoring plan may be appropriate, historical-period archaeological resources are much more likely to be present, and a monitoring plan is not adequate in this circumstance. An archaeological testing plan should be developed for any major ground-disturbance activities to identify historical-period archaeological materials.
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Response to Comment No. 26-E.2-61

Refer to Response to Comment No. 26-42 regarding the assessment of historical archaeological resources discussed in Section IV.B, Cultural Resources, of the Draft EIR, including the infeasibility and lack of necessity for an archaeological testing plan. Also refer to Response to Comment No. 26-44 on how the provisions included in the proposed Mitigation Measure (CUL-MM-1) provide a reasonable and feasible means of avoiding or reducing potentially significant impacts during ground-disturbing activities. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate,

and appropriately treat any archaeological resources identified during ground disturbing activities.

Comment No. 26-E.2-62

42.	Appendix C.1 Historical Resources Technical Report	Section 1.3, Impacts Analysis Assessment; Section 3, Methodol- ogy		The HRG report was focused on built-environment resources, and so does not take into account the potential for intact, buried archaeological deposits. This is not a shortcoming in the HRG report, but it should be noted that the absence of data related to archaeology in the report does not indicate a finding that the project will have no impact on archaeological resources. Section 1.3, Impacts Analysis Assessment, and Section 3, Methodology, only consider built-environment resources. The Archaeological and Tribal Cultural Resources report (Appendix C.2) must make similar Impacts Analysis Assessments regarding potential impacts to buried archaeological deposits. Such an analysis in the Archaeological and Tribal Cultural Resources report should include pertinent data from the archival research (historical photographs, aerial photographs, Sanborn maps) compiled for the HRG report that can assist in the assessment of potential sensitivity for intact archaeological deposits across the project area.
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Response to Comment No. 26-E.2-62

The analysis presented in Section IV.B, Cultural Resources, of the Draft EIR was informed by the content in the Historic Report (Appendix C.1 of the Draft EIR) but was not the basis for making any assertion that there is an absence of an archaeological resource.

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-15 regarding the efforts made to obtain substantial evidence used to assess the potential for buried archaeological resources within the Project Site, which includes review of historical photographs, aerial imagery, and maps. Additional explanation of how these results further support the analysis presented in the Section IV.B, Cultural Resources, of the Draft EIR are described in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final

EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-63

43.	Appendix C.1 Historical Resources Technical Report	General Comment	Entire Document	<p>Visual-resource analysis and landscape analysis studies are missing. These analyses are needed to identify potential threats to the viewshed (e.g., regarding scenic integrity, visual quality, and viewer sensitivity [i.e., the level of public interest in the existing landscape/streetscape characteristics and concern over potential changes]) and suggest management strategies.</p> <p>A viewshed analysis study would identify character-defining features looking from the project site, evaluate scenic integrity, and document existing visual conditions both to and from the project site. The goal is to minimize the degree of contrast between new construction and surrounding historical resources. It should be noted that while retaining the visual prominence of the north facade of the primary studio complex is discussed (i.e., the view to the building from Beverly Boulevard), there is no consideration of adverse visual effects to this historic-cultural monument and surrounding historic properties from new construction.</p> <p>Furthermore, a landscape analysis study of the adjacent Pan Pacific Park is recommended to determine if it is a historically significant cultural landscape, in terms of its natural systems and features, spatial organization, land use, cultural traditions, cluster arrangement, circulation, vegetation, buildings and structures, views and vistas, small-scale features, archaeological sites, etc. If historically significant and eligible for listing in the NRHP and/or CRHR, then the impacts, visual or otherwise, from project construction must be considered.</p>
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Response to Comment No. 26-E.2-63

Refer to Sections C, Potential New Construction North of the Primary Studio Complex, D, Analysis of Impacts to the Primary Studio Complex, and E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, which include consideration of impacts associated with new construction within the Project Site.

This comment incorrectly conflates aesthetic and historic impacts. Under CEQA, impacts to aesthetics are based on different criteria and thresholds than those used for historical resources. As set forth in Appendix G of the CEQA Guidelines and in the Initial Study for the Project included as Appendix A of the Draft EIR, aesthetic impacts under CEQA include the consideration of: scenic vistas; scenic resources, including historical resources, within a scenic highway; for urban projects, consistency of the project with applicable regulations regarding scenic quality; and light and glare. Thus, the analysis of aesthetics considers the experiences of people who may view a scenic resource, while the analysis of historic impacts considers whether a project would adversely affect the integrity of an historical resource.

As described in Section 4.I on pages 30-31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact,” unless evaluation is required under other land use regulations in the LAMC. An evaluation of aesthetic impacts is not required under the LAMC. As such, no further analysis was required in the Draft EIR for this topic. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Additionally, this comment does not demonstrate or provide any evidence that the visibility of new construction would result in a substantial adverse change such that the physical characteristics of any historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, historic listing would be materially impaired. As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, mere visibility of a new building, structure, or feature from various vantage points alone would not result in a significant impact to any of the historical resources located in the vicinity of the Project Site. Furthermore, detailed visual resource analyses are not needed, and the analysis is properly focused on the integrity of historical resources. For a significant impact to occur, the integrity of the historical resource would have to be diminished to the degree that it would no longer be

able to convey its significance.¹¹³ The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the historical resources in the vicinity, including their integrity of *setting*, and concluded that any impacts would be less than significant.

Contrary to the claims of the commenter, a landscape analysis of Pan Pacific Park, including an assessment of its potential historic significance, is not required under CEQA. The park itself, which did not begin to take on its present form until the 1980s, has not been identified as historically significant in any previous study, including SurveyLA. More importantly, Pan Pacific Park is located outside the Project Site and the Project will not include any material alteration to the park.

Comment No. 26-E.2-64

44.	Appendix C.1 Historical Resources Technical Report	Page 24	The massive Rancho La Brea (Rancho). Most of the Salt Lake Oil Field	Historic context information is lacking. What was this? A Spanish Land Grant? What area did it cover, who controlled it, when was it granted? How was it used? What was the oil field and when was it developed and by whom. Who are the Hancocks and Gilmores? When did they arrive in LA and from where? We need a historic context, not this brief summary. There is no discussion of Gilmore Stadium or Gilmore Field, which directly impinge on Project area. This omission is especially disturbing.
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Response to Comment No. 26-E.2-64

Relevant information regarding the early history of the Project Site and surrounding areas is included in Sections 5 and 6 of the Historic Report (Appendix C.1 of the Draft EIR) and, by attachment, the 2018 Historic Resource Assessment. Because the existing condition of the Project Site only dates back to 1952, detailed context regarding Spanish Land Grants, previous owners of surrounding properties, Gilmore Stadium and Gilmore Field (both long demolished) is not required in order to examine potential impacts to historical resources.

¹¹³ CEQA Guidelines Section 15064.5(b)(2).

Comment No. 26-E.2-65

45.	Appendix C.1 Historical Resources Technical Report	Page 33	Rationale for the period of Significance finally presented. 1952 to 1963 captures the postwar evolution of CBS as it grew into one of the country's 3 largest television networks and with the construction of Television City as the first large-scale, purpose-built television production facility in Los Angeles. "Extensive research" did not indicate that any of Television City's post-1963 additions contribute to the historical significance of the Primary Studio Complex	This is very weak justification. Where is the extensive research presented? Not in this document.
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Response to Comment No. 26-E.2-65

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the clear rationale for the period of significance. Additionally, a copy of the 2018 Historic Resource Assessment is attached to the Historic Report (Appendix C.1 of the Draft EIR).

Comment No. 26-E.2-66

46.	Appendix C.1 Historical Resources Technical Report	Page 34	The 1969 and 1976 additions "are architecturally compatible with the Primary Studio Complex but do not reflect functional adherence" to Pereira & Luckman's original master plan.	Exact restatement of conclusion in Cultural Resources report pg. B-24 (see above) without any additional argument about how these buildings deviate from the original plan. Additional assessment and recirculation of the DEIR is required.
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Response to Comment No. 26-E.2-66

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance. Also refer to Response to Comment No. 26-E.2-45 for a discussion of how the post-1963 additions were not intended to align with the original master plan for Television City.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section

15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-67

47.	Appendix C.1 Historical Resources Technical Report	Figure 4	Primary Studio Complex Existing Condition	Very difficult to read. Figure should be revised.
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Response to Comment No. 26-E.2-67

This graphic is legible. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.2-68

48.	Appendix C.1 Historical Resources Technical Report	Figure 6	Removal of Portions of the Primary Studio Complex	Over half of the Service Building, which is part of the HCM (see also pgs. 58 and 64) is being removed. This is a significant impact that would severely damage the integrity of the Service Building and the HCM.
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Response to Comment No. 26-E.2-68

Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-46 regarding the analysis of impacts from demolition of the southern portion of the Service Building. As discussed therein and demonstrated by the analysis within Section IV.B, Cultural Resources, of the Draft EIR, impacts to the Primary Studio Complex would be less than significant and the overall form and volume of the original Primary Studio Complex would be improved as compared to existing conditions with implementation of the Project.

Comment No. 26-E.2-69

49.	Appendix C.1 Historical Resources Technical Report	Figure 7	Primary Studio Complex Roof Retention, etc.	Is there an area of restoration in this figure, as indicated in key?
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Response to Comment No. 26-E.2-69

No areas of restoration are shown in Figure 7 on page 61 of the Historic Report (Appendix C.1 of the Draft EIR). However, these areas are shown in Figure 8 and Figure 9 on pages 62 and 63 of the Historic Report, which share the same map key.

Comment No. 26-E.2-70

50.	Appendix C.1 Historical Resources Technical Report	Page 65	Primary Studio Complex Rooftop Addition	This is another major impact to HCM that could severely damage its integrity. Additional assessment and recirculation of the DEIR is required.
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Response to Comment No. 26-E.2-70

As analyzed in Section 9.6 of the Historic Report (Appendix C.1 of the Draft EIR), a rooftop addition that conforms to Project Design Feature CUL-PDF-1 would still maintain the integrity of the Primary Studio Complex.

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-10, the potential impacts from any rooftop addition were thoroughly analyzed in the Draft EIR (see page IV.B-50 in Section IV.B, Cultural Resources, of the Draft EIR) and Historic Report (see Appendix C.1 of the Draft EIR, pages 65–68), and the Draft EIR correctly concluded that with Project Design Feature CUL-PDF-1, any rooftop addition would not materially alter in an adverse manner the physical characteristics that convey the historic significance of the Primary Studio Complex. As such, impacts associated with any rooftop addition were clearly demonstrated in the Draft EIR to be less than significant.

Comment No. 26-E.2-71

51.	Appendix C.1 Historical Resources Technical Report	Figure 10	Additions and Service Building Replacement Volume	This rooftop addition is much larger and more massive than the earlier ones it will replace. It impacts the facade much more than suggested in text. The other additions are also covering up all the walls that will supposedly be rehabilitated.
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Response to Comment No. 26-E.2-71

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-10, the

potential impacts from any rooftop addition were thoroughly analyzed in the Draft EIR (see page IV.B-50 in Section IV.B, Cultural Resources, of the Draft EIR) and Historic Report (see Appendix C.1 of the Draft EIR, pages 65–68), and the Draft EIR correctly concluded that impacts associated with any rooftop addition would be less than significant.

The analysis of the rooftop addition is not predicated on existing additions. The existing rooftop additions, many of which date after the period of significance for the Primary Studio Complex, are not relevant to the analysis of potential impacts from the proposed rooftop addition, and their location, scale, and massing do not represent any framework, standard, or building envelope for potential future additions. Any rooftop addition proposed by the Project is correctly analyzed independently for its potential physical alteration of the Primary Studio Complex as defined by CEQA. Contrary to the assertion of the commenter, the primary façade of the Primary Studio Complex would be fully restored by the Project.

Reference to the “other additions... covering up all the walls that will supposedly be rehabilitated” is unclear, but the East Building and West Building analyzed as part of the Conceptual Site Plan on pages IV.B-52 to IV.B-53 in Section IV.B, Cultural Resources, of the Draft EIR and the Historic Report (Appendix C.1 of the Draft EIR, pages 71–73) would be constructed as distinct and separate volumes that will not “cover up” the east and west walls of the Primary Studio Complex. Contrary to the assertion of the commenter, the west wall of the Studio Building and the northern portion of the Service Building’s east wall would be rehabilitated and made fully visible by the Project.

Comment No. 26-E.2-72

52.	Appendix C.1 Historical Resources Technical Report	Figure 11	New Construction Adjacent to Primary Studio Complex (For illustrative purposes only)	This is very deceptive. What are “illustrative purposes”? It is actually what a full build out of proposed construction would be like (cf. Fig. II-5 in Project Description). It is massive and completely overwhelms the original complex. This will seriously compromise the integrity of the HCM.
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Response to Comment No. 26-E.2-72

Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-6 regarding the Draft EIR’s analysis of impacts to the Primary Studio Complex from buildout of the Project and adjacent new construction.

As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. The Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website for informational purposes prior to the release of this Final EIR. Please note that this draft is not final and has not been approved by City decision-makers. In addition, as discussed in Response to Comment No. 5-13 above, Figure 11, New Construction Adjacent to Primary Studio Complex, on page 73 of the Historic Report (Appendix C.1 of the Draft EIR) is an illustrative massing diagram of the Conceptual Site Plan. The Conceptual Site Plan complies with the height zone limitations shown in Figure II-5, Height Zone Map, in Section II, Project Description, of the Draft EIR.

Further, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, any site plan or massing diagram included in an EIR or other CEQA document is inherently conceptual and is provided for illustrative purposes, as plans are finalized during the building permit process, which occurs after a project is approved and its EIR certified.

The assertion by the commenter that adjacent new construction as illustrated in the conceptual plan is "massive" and "completely overwhelms" the Primary Studio Complex is the opinion of the commenter, which is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. No additional analysis or evidence is provided to support the claim that adjacent construction will compromise the integrity of the Primary Studio Complex such that its eligibility for historic listing is threatened as required by CEQA.

Comment No. 26-E.2-73

53.	Appendix C.1 Historical Resources Technical Report	Figure 12	Conceptual Site Plan	This does not look anything like Fig. 11 or what is suggested in Fig. II-5 of Project Description.
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Response to Comment No. 26-E.2-73

As discussed in Response to Comment No. 26-E.2-72, Figure 11, New Construction Adjacent to Primary Studio Complex, on page 73 of the Historic Report (Appendix C.1 of the Draft EIR) is an illustrative massing diagram of the Conceptual Site Plan (Figure 12 of

the Historic Report). The Conceptual Site Plan complies with the height zone limitations shown in Figure II-5, Height Zone Map, in Section II, Project Description, of the Draft EIR.

Please note that the Historic Report inadvertently included an earlier version of the Conceptual Site Plan (the correct version is included in Figure II-4, Conceptual Site Plan, on page II-14 in Section II, Project Description, of the Draft EIR). The only difference between the two versions is that the flex stage to the northeast of the Service Building is removed in Figure II-4 in the Project Description. However, this does not change any of the analysis or impact conclusions in the Draft EIR.

Comment No. 26-E.2-74

54.	Appendix C.1 Historical Resources Technical Report	Page 81	The Primary Studio Complex would retain its original location, concrete and steel construction, the majority of its original plan and massing and all of its character-defining features after implementation of the proposed Project.	Fails to acknowledge that full build-out would overwhelm and obscure most of the Primary Studio Complex and would likely impact the View Restoration area. This is a significant impact.
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Response to Comment No. 26-E.2-74

The commenter asserts that the Project has the potential to “overwhelm” or “obscure” the Primary Studio Complex but does not demonstrate how the Project will result in demolition or material alteration of the physical characteristics of the Primary Studio Complex that justify its eligibility for listing in the California Register and designation as an HCM as defined in CEQA Guidelines Section 15064.5(b). Refer to Sections C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, as well as Response to Comment No. 26-E.2-6 regarding the Draft EIR’s comprehensive analysis of impacts to the Primary Studio Complex from buildout of the Project and new adjacent construction.

Comment No. 26-E.2-75

55.	Appendix C.1 Historical Resources Technical Report	Page 86	The Project would also include the construction of two buildings adjacent to the Primary Studio Complex to the east and west. Both buildings would have potential heights of up to 225 feet above Project Grade. Both the East Building and West	This is part of the full build-out illustrated in Figure 11. 10 feet as separation between the Studio and a 225-foot-high building is insufficient. The new construction would clearly overwhelm and obscure the HCM and seriously compromise its integrity.
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			Building would also be constructed as distinct volumes, physically separated from the Primary Studio Complex by a minimum of 15 feet on the east and 10 feet on the west.	
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Response to Comment No. 26-E.2-75

The commenter asserts that the Project has the potential to “overwhelm” or “obscure” the Primary Studio Complex but does not demonstrate how the Project will result in demolition or material alternation of the physical characteristics of the Primary Studio Complex that justify its eligibility for listing in the California Register and designation as an HCM as defined in CEQA Guidelines Section 15064.5(b). Refer to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-6 regarding the Draft EIR’s comprehensive analysis of impacts to the Primary Studio Complex from buildout of the Project and new adjacent construction. The analysis accounted for the 10-foot separation cited in this comment.

Comment No. 26-E.2-76

56.	Appendix C.1 Historical Resources Technical Report	PDF pages 120–125	Construction Plans	Not clear what these actually illustrate. Further explanation is needed.
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Response to Comment No. 26-E.2-76

As discussed in Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Draft EIR analyzed the proposed development program described in Section II, Project Description, of the Draft EIR (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, Figure II-4, Conceptual Site Plan, of the Draft EIR is based on the architectural plans included as Appendix B in the Historic Report (Appendix C.1 of the Draft EIR), as stated in this comment. These plans are part of the administrative record and have been publicly available on the Department of City Planning’s website, as evidenced by this comment.

Comment No. 26-E.2-77

57.	Appendix C.1 Historical	CHC-2018- 476-HCM,	Viewshed; It is expressly understood that in order to	HCM designation based almost entirely on narrow 430-foot-long
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	Resources Technical Report,	May 22, Page 2 and 3; Appendix C, Pages 134–135	achieve meaningful views, any future development within this Future Viewshed Restoration Area should not reduce views of the enumerated Exterior Viewshed Features to mere slivers or glimpses.	viewshed of Primary Studio Complex as seen from Beverly Blvd. Even with this narrow viewshed, overall integrity of the complex could be seriously compromised by the Project.
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Response to Comment No. 26-E.2-77

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, which includes a discussion of the regulations and procedures for new construction in the Viewshed Restoration Area that will preserve and restore the historic viewshed along Beverly Boulevard.

The characterization of the 430-foot-wide viewshed corridor as “narrow” is merely the opinion of the commenter and is not supported by facts or analysis, nor is it demonstrated how this presumed narrowness will result in substantial adverse change to the Primary Studio Complex as required by CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.2-78

58.	Appendix C.1 Historical Resources Technical Report,	CHC-2018-476-HCM, May 22	it is assumed that such buildings would not exceed two-thirds the height of the existing Primary Studio Complex, and that one-story buildings would be acceptable throughout the Future Viewshed Restoration Area. Notwithstanding the foregoing, this requirement does not absolutely prohibit structures that are higher than the two thirds limit, so long as such structures do not interfere with the mandated view corridors.	The viewshed and view corridors described are inadequate to reduce the significant impacts of the Project's multistory towers.
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Response to Comment No. 26-E.2-78

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, which includes a discussion of

the regulations and procedures for new construction in the Viewshed Restoration Area that will preserve and restore the historic viewshed along Beverly Boulevard.

Comment No. 26-E.2-79

59.	Appendix C.1 Historical Resources Technical Report	Page 5; Appendix C, Page 137	CEQA Findings Purpose of the HCM designation is to prevent significant impacts	The Project is inconsistent with the HCM designation, as the proposed full build-out would result in significant impacts.
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Response to Comment No. 26-E.2-79

This comment incorrectly claims that the Project is inconsistent with the HCM designation. Rather, as discussed in Section IV.B, Cultural Resources, of the Draft EIR and Topical Response No. 5, Historical Resources, the Project would fully comply with the HCM designation. Refer specifically to Sections B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of the topical response. As discussed in the topical response and demonstrated by the analysis in the Draft EIR, buildout of the Conceptual Site Plan would not result in any significant impacts to historical resources.

Comment No. 26-E.2-80

60.	Appendix C.1 Historical Resources Technical Report,	CHC-2018- 476-HCM, May 3, Page 2; Appendix C, Page 141	Since construction in 1952, the TV building has been the site of filming many important shows including the Smothers Brothers Comedy Hour and All in the Family	These shows had an important impact on culture and politics and continued well into the 1970s, long after the “period of significance” ended. As noted herein, the period of significance is artificially limited, and the technical report should be revised to include this period.
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Response to Comment No. 26-E.2-80

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for a detailed discussion regarding the period of significance.

Comment No. 26-E.2-81

61.	Appendix C.1 Historical Resources	Pages 188– 189	several programs produced at CBS Television City played significant roles in changing	The Historic Commission Nomination Form, March 1, Statement of Significance, clearly indicates that
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	Technical Report		the social and political character of the nation. These include the Smothers Brothers Comedy Hour (1967-1970), which pushed the boundaries of political speech during the Vietnam War, and producer Norman Lear's [sic] All in the Family (1971–1979), which injected controversial social issues into the mass media and mass culture... Situation comedies have always been popular productions, from the first broadcast from Television City in 1952 through the 1970s sit-coms produced in front of a live studio audience	the period of significance should extend through the 1970s.
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Response to Comment No. 26-E.2-81

The discussion of ongoing television production into the late 20th century was not specifically expressed as a period of significance in the HCM application. This discussion was, however, considered as part of the designation process, and construction dating after 1963 was ultimately not included in the HCM designation. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the period of significance.

Comment No. 26-E.2-82

62.	Appendix C.1 Historical Resources Technical Report	Page 191	Gin Wong (1922-2017) was the original project coordinator on CBS Television City. Also considered a master architect, he was honored in the 2012 exhibit "Breaking Ground: Chinese American Architects in Los Angeles" at the Chinese American Museum in Los Angeles	Wong designed the 1969 and 1976 additions. The technical report should be revised to include a discussion of Gin Wong and his connection to the Project Site. Removal of these buildings is a significant impact.
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Response to Comment No. 26-E.2-82

Gin Wong was discussed on pages IV.B-18 to IV.B-19 in Section IV.B, Cultural Resources, of the Draft EIR and page 27 of the Historic Report (Appendix C.1 of the Draft EIR). As stated therein, Television City was originally developed in 1952 in accordance with a master plan, conceptualized as 2.5 million square feet of total development designed

by the local architectural team of William Pereira and Charles Luckman. In a supporting role, Gin Wong, who would go on to become an important architect in his own right, was the project coordinator for Television City. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources. As discussed therein, Gin Wong's contribution to the design and construction of Television City are acknowledged in the 2018 Historic Resource Assessment (included as Appendix D of the Historic Report) and the HCM designation (included as Appendix C of the Historic Report).

As discussed in Section IV.B, Cultural Resources, of the Draft EIR, the 1969 eastern expansion of the Service Building (referred to as the Mill Addition) and the attached Support Building, which was constructed on the west side of the Studio Building in 1976, were added to the Primary Studio Complex after 1963 and are not part of the HCM. The adopted HCM designation limited the HCM to the original 1952 Primary Studio Complex, which consists of the Studio Building on the west and the Service Building on the east. As stated in the HCM Findings, "[t]he CBS Television City proposed Historic-Cultural Monument is limited to the exterior of the original 1952 buildings (the 'Studio Building' on the west, and the 'Service Building' on the east) and the CBS logo tiles in the main entry lobby and adjacent corridor." The HCM Findings are included in Appendix C of the Historic Report. Thus, the Draft EIR and Historic Report correctly concluded that the demolition of the non-historic 1969 Mill Addition and the 1976 Support Building would not materially impair the historic significance and integrity of the Primary Studio Complex.

Comment No. 26-E.2-83

63.	Appendix C.1 Historical Resources Technical Report	Letter from Gibson Dunn Page 2	The attached report, prepared for CBS by Architectural Resources Group in 2018, is where the 1952–1963 period of significance is first introduced. Terminal date is based on CBS' "abandoned its vision of a single unified television production facility and moved its filmed productions to the CBS Studio Center Lot in Studio City,"	It is important to recognize that this period of significance is not included in the final HCM designation and TV City continued to produce many important and popular "live" programs such as the above-mentioned Smothers Brothers and All in the Family at least through the 1970s (see pg. 36 [Appendix C, pg. 303]).
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Response to Comment No. 26-E.2-83

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, for a detailed discussion regarding the period of significance that concluded in 1963.

Comment No. 26-E.2-84

64.	Appendix C.1 Historical Resources Technical Report	Pages 6–7; Appendix C, Page 273– 274	“CBS Television City occupies three parcels totaling approximately 25 acres and comprises four main buildings: a complex of three attached studio, service, and support buildings constructed between 1952 and 1976”	Establishes these three buildings as a single unified complex, although subsequently excludes Support building from “Primary Studio Complex.”
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Response to Comment No. 26-E.2-84

The reference to three attached buildings describes the existing condition. The reference to the “Primary Studio Complex” describes only those portions of the existing building that are historically significant and are included in the HCM designation, which excludes the 1963 Mill Addition and the 1976 Service Building. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the adopted HCM designation and the period of significance. The Primary Studio Complex includes two adjoining buildings constructed in 1952 (the Service Building on the east and the Studio Building on the west), the 1959 enclosure of the Service Building’s north façade, and a small compressor room addition to the Service Building’s east façade.

Comment No. 26-E.2-85

65.	Appendix C.1 Historical Resources Technical Report	Page 14; Appendix C, Page 281	1950 CBS purchases a 15 acre parcel at the southeast corner of Beverly Boulevard and Fairfax Avenue containing Gilmore Stadium from Earl Gilmore’s daughters Elizabeth Hilty and Frances L. Hiler. It also takes an option on a six acre parcel east of Genesee Avenue containing Gilmore Field.	TV City built on Gilmore Stadium and Field, but the history or construction of these important features are not addressed in any of these analyses. This is a significant omission. The technical report should be revised to correct this omission.
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Response to Comment No. 26-E.2-85

Refer to Response to Comment No. 26-E.2-64. Relevant information regarding the early history of the Project Site and surrounding areas is included in Sections 5 and 6 of the Historic Report (Appendix C.1 of the Draft EIR) and, by attachment, the 2018 Historic Resource Assessment.

Comment No. 26-E.2-86

66.	Appendix C.1 Historical Resources Technical Report	Page 16; Appendix C, Page 283	1976 Support Building addition constructed at west elevation of Studio Building (LADBS LA19446, 1/9/76; LA23283, 3/10/76).10 Architect: Emmanuel I. Aguilera of Gin Wong Associates.	Gin Wong Associates are the architects of the Support Building. The technical report should be revised to include a discussion of Gin Wong and his connection to the Project Site. Removal of this building is a significant impact.
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Response to Comment No. 26-E.2-86

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-82 regarding the period of significance and Gin Wong's contributions to Television City. As discussed therein, removal of the 1976 Support Building is not a significant impact under CEQA.

Comment No. 26-E.2-87

67.	Appendix C.1 Historical Resources Technical Report	Page 53; Appendix C, Page 320	The 1969 and 1976 expansions: "their simple rectangular massing and cladding of unornamented concrete and corrugated metal matched the rest of the complex; was faithful to the appearance of the existing complex. The Support Building retained the massing, cladding, and perimeter concourses characterizing the Studio Building	The 1969 additions continued the function of the original studio in filming important live TV shows. They were designed by master architects (one affiliated with the original construction) and were compatible with the original construction. So, why are they excluded from the "period of significance" and the HCM designation?
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Response to Comment No. 26-E.2-87

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance and non-historic post-1963 additions. As discussed therein, the period of significance was defined by the adopted HCM designation. Also refer to Response to Comment No. 26-E.2-4 for a discussion of why continued use does not equate to a continued period of significance.

Refer to Response to Comment No. 26-E.2-82 for a discussion of why the relevant additions are not representative of the architectural achievements Gin Wong is well known for, and removal of these buildings is not a significant impact.

Comment No. 26-E.2-88

68.	Appendix C.1 Historical Resources Technical Report	Page 60; Appendix C, Page 327	Extensive research did not indicate that any of Television City's post 1963 additions contribute to its historical significance. These include the 1969 eastern expansion of the Service Building, the 1976 addition of the Support Building west of the Studio Building... The 1969 and 1976 additions are architecturally compatible with the 1952 buildings but do not reflect functional adherence to Pereira & Luckman's original master plan for the site	The above comments suggest otherwise. This report should have included more research on how the studio was used in the late 1960s and 1970s rather than only on its architectural elements (which they admit are compatible).
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Response to Comment No. 26-E.2-88

Construction dating after 1963 was not included in the HCM designation. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the existing evaluation and designation of the Primary Studio Complex. Additionally, a copy of the 2018 Historic Resource Assessment is attached to the Historic Report (Appendix C.1 of the Draft EIR). The historical and architectural significance of Television City were considered in the evaluation of eligibility as a historical resource.

Comment No. 26-E.2-89

69.	Appendix C.1 Historical Resources Technical Report	Page 63; Appendix C, Page 330	The subject property is also an important work of master architect Gin Wong, who worked for Pereira & Luckman and served as project coordinator for the initial phase of the property's master plan. Wong was made partner at William Pereira and Associates after Pereira dissolved his partnership with Luckman, eventually becoming president of the firm.	The 1976 expansion was designed by a master architect involved in the original construction of the HCM. The technical report should be revised to include a discussion of Gin Wong and his connection to the Project Site.
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Response to Comment No. 26-E.2-89

Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-82 regarding the period of significance and Gin Wong's contributions to Television City.

Comment No. 26-E.2-90

70.	Appendix C.1 Historical Resources Technical Report	Pages 63– 64; Appen- dix C, Pages 330–331	Although the subject property has already been substantially excavated and graded as part of its development, it may contain intact subsurface deposits relating to historic occupations including Gilmore Field, Gilmore Stadium, the Gilmore Adobe of Rancho La Brea, and smaller properties like the drive in and gas station known to have been present prior to 1952. ¹⁴⁵ The area is also known to have a high occurrence of subsurface paleontological deposits, ¹⁴⁶ which are sometimes accompanied by archaeological deposits containing evidence of prehistoric human activity. Because a comprehensive archaeological assessment was not included in the scope of this report, the property's potential to yield information important in prehistory or history is currently unknown.	No comprehensive archaeological or paleontological assessment was completed. This is a significant omission. The assessments must be included in the DEIR and the DEIR recirculated.
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Response to Comment No. 26-E.2-90

This comment refers to the omission of an archaeological analysis in the Historic Report (Appendix C.1 of the Draft EIR), but this study is not intended to provide an authoritative review of these resources and is not presented as the definitive source for either, although it does assist the analysis to characterize aspects of the historical setting relevant to the assessment of archaeological resources. Refer to Response to Comment Nos. 13-7 and 26-42 regarding the efforts made to obtain substantial evidence used to assess the potential for buried archaeological resources within the Project Site.

Refer to Response to Comment No. 13-7 regarding the Draft EIR's comprehensive analysis of the Project's potential impacts to paleontological resources.

The Draft EIR contained a comprehensive evaluation of paleontological resources that may be present at the Project Site. As discussed in Response to Comment No. 35-90, this evaluation was based on a records search from the Natural History Museum of Los Angeles and the Paleontological Resources Review Memorandum prepared by Dudek (included as Appendix F of the Draft EIR). Refer to Response to Comment No. 35-90 for additional discussion of the Draft EIR's analysis of paleontological resources.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.2-91

71.	Appendix C.2 Tribal Cultural Resources Report	Page 15; Appendix C, Page 418	The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall 1990);	Statements are not supported and appear inaccurate. One hallmark of the Intermediate period is the introduction of the mortar and pestle. Additionally, the Basgall and Hall report referenced is regarding a Mojave Desert site. What is the relevance of information for a Mojave Desert site?
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Response to Comment No. 26-E.2-91

Refer to Response to Comment No. 26-E.2-12 regarding the discussion of mortar and pestle and its relevance to the discussion of existing conditions.

Refer to Response Comment No. 26-42 regarding the discussion of regional context for Southern California. The Tribal Cultural Resources Report draws on broader regional patterns that are documented through review and some of these expand the discussion to the Mojave Desert, which is only indirectly relevant to this discussion of existing conditions

that is otherwise supported by the broader summary of Native American history and ethnography that provide an adequate means of characterizing the existing conditions. Response Comment Nos. 26-42 and 26-E.2-12 include references to the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which provides additional discussion and expert opinion regarding the chronological typologies used to describe the cultural setting and the topic related to the introduction of the mortar and pestle in the Native American archaeological record.

Comment No. 26-E.2-92

72.	Appendix C.2 Tribal Cultural Resources Report	Page 19; Appendix C, Page 422	Inhumation of deceased Tongva was the more common method of burial on the Channel Islands while neighboring mainland coast people performed cremation (Harrington 1942; McCawley 1996)	Inhumation much more common, especially on mainland coast, as documented at a Guaspet, LAN-47, the ARCO site, and other sites. Cremation may have been more common in Intermediate and earlier periods, but inhumation also common in those times. Mourning ceremony continued into Mission period.
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Response to Comment No. 26-E.2-92

Refer to Response to Comment No. 26-E.2-12 regarding the topic of Gabrielino burial practices and the discussion of existing conditions. This topic involves matters of scholarly research and is one of many details within the larger discussion of the cultural setting and the body of evidence used to characterize the existing conditions of the Project Site. Response to Comment No. 26-E.2-12 includes a reference to the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which provides additional discussion and expert opinion regarding Gabrielino burial practices. After having further considered the information presented in the Tribal Cultural Resources Report and the Draft EIR, the Supplemental Cultural Memo did not identify any new or substantially more significant impacts than what were disclosed in the Section IV.L, Tribal Cultural Resources, of the Draft EIR and in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Comment No. 26-E.2-93

73.	Appendix C.2 Tribal Cultural Resources Report C	III	This report was prepared to assist in the identification and documentation of potential impacts to Tribal Cultural Resources	Does not address non-tribal resources. This is a significant omission. The assessments must be included in the DEIR and the DEIR recirculated.
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Response to Comment No. 26-E.2-93

Refer to Response to Comment Nos. 13-7, 26-42, 26-44, and 26-E.2-11 regarding the efforts made to obtain substantial evidence used to analyze the potential for impacts to archaeological resources within the Project Site, including but not limited to non-tribal archaeological resources. The information presented in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) is one information source among many that were considered. Additional explanation of how these results further support the analysis presented in the Section IV.B, Cultural Resources, of the Draft EIR are described in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-94

74.	Appendix C.2 Tribal Cultural Resources Report C	III	tribal consultation completed by the City pursuant to California Assembly Bill (AB) 52	SB-18 also applies. Is project in compliance with SB-18?
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Response to Comment No. 26-E.2-94

Refer to Response to Comment No. 26-E.2-17 regarding the explanation of why SB 18 does not apply.

Comment No. 26-E.2-95

75.	Appendix C.2 Tribal Cultural Resources Report	2	However, the Project Applicant is seeking a Development Agreement with a term of 20 years	As noted herein, more resources may become eligible during this time. Further evaluation must be required through an appropriate mitigation measure.
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Response to Comment No. 26-E.2-95

The buildout year does not change the findings of the analysis of tribal cultural resources. As discussed on page IV.L-17 of Section IV.L, Tribal Cultural Resources, of the Draft EIR, in the event of an extended buildout, any development on the Project Site would be subject to the City's standard Condition of Approval for the inadvertent discovery of tribal cultural resources. Thus, impacts would be less than significant, and no mitigation is required.

Comment No. 26-E.2-96

76.	Appendix C.2 Tribal Cultural Resources Report C	13–14	4.1.1 Paleoindian Period	<p>Because there was no pedestrian survey completed of the project area and Los Angeles is mostly paved, the records-search area of ½-mile radius needs to be increased to 10 miles to capture relevant cultural sites. Sites in the LA Basin such as LAN-64, LAN-138, LAN-159, LAN 171, LAN-172, and the Clovis site in Malibu recorded by E. Gary Stickel approximately 10 years ago need to be addressed.</p> <p>Section as a whole is focused on the San Dieguito culture. Why is the San Diego area discussed? What's the relevance? The TCR must be revised to include discussion of LA Basin.</p>
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Response to Comment No. 26-E.2-96

Refer to Response to Comment No. 26-42 regarding the records search radius and discussion of the regional context, including sites from the San Diego area.

Regarding the discussion of the Paleoindian Period presented in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, this section and those that follow it are intended to provide a reasonable overview of Native American history across different time periods for the region at large and the Project Site. This is accomplished without the addition of a detailed discussion of the six sites referenced in the comment (which are between approximately 3.6 and 25 miles from the Project Site), or an exhaustive search of all Native American archaeological sites within a 10-mile radius or within the entire Los Angeles Basin and surrounding geographies like Malibu. Refer to Response to Comment Nos. 13-7 and 26-42 regarding the data sources used to characterize the potential for buried sites on a more detailed scale, for example CA-LAN-3045H and CA-LAN-159, and the approach taken in the discussion of the regional context. Additional information on the sites referenced in the comment or others in the region would only serve to further reinforce the conclusions already reached based upon the existing source material and would be unlikely to identify any new or substantially more significant impacts than what were disclosed in the Draft EIR, the Tribal Cultural Resources Report, Historic Report, Preliminary Geotechnical Engineering Investigation, and Phase I Environmental Site Assessment. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion regarding the information obtained in the CHRIS records search results, standard units used to conduct the CHRIS records

search, and why this information adequately characterized the existing conditions of the Project Site.

Comment No. 26-E.2-97

77.	Appendix C.2 Tribal Cultural Resources Report C	14	4.1.2 Archaic Period	Chronology covers 8,500 years and is outdated. Section again is focused on San Diego area. Why? Information relevant to the project area needs to be included in the TCR and the DEIR recirculated.
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Response to Comment No. 26-E.2-97

Refer to Response to Comment No. 26-42 regarding the approach taken in the discussion of the regional context, including consideration of sites in the San Diego area.

Refer to Response to Comments Nos. 13-7 and 26-42 regarding the entire body of evidence considered in the assessment of tribal cultural resources, broader discussions of the historical context and specific analysis of the Project Site. Also refer to the summary of these topics in Response to Comment No. 26-E.2-96.

Comment No. 26-E.2-98

78.	Appendix C.2 Tribal Cultural Resources Report C	15	4.1.3 Late Prehistoric Period	Section does not cite any site reports from this time period. Information must be included and assessed.
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Response to Comment No. 26-E.2-98

Refer to Response to Comment No. 26-42 regarding the approach taken in the discussion of the regional chronologies and Response to Comment No. 26-E.2-96 addressing how this is also applied to discussion of specific periods referenced in the analysis. Additional information on the Late Prehistoric Period would only serve to further reinforce the conclusions already reached based upon the existing source material and would be unlikely to identify any new or substantially more significant impacts than what were disclosed in the Section IV.L, Tribal Cultural Resources, of the Draft EIR and the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Comment No. 26-E.2-99

79.	Appendix C.2 Tribal Cultural	15	4.2 Ethnographic Overview	Section is outdated and does not cite Playa Vista, which is relevant to an
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	Resources Report C			understanding of ethnography in the LA area. The TCR must be revised to include a comprehensive analysis of the ethnography in the LA area and the DEIR recirculated.
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Response to Comment No. 26-E.2-99

The Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR outlines key features of Gabrielino culture as described in ethnographic works and summarized in seminal publications over the last 50 years. This summary provides a reasonable characterization of Gabrielino history as part of the baseline conditions necessary to assess tribal cultural resources. Additional information on the research completed for Native American sites in the Playa Vista area would only serve to further reinforce the conclusions already reached based upon the existing source material and would be unlikely to identify any new or substantially more significant impacts than what were disclosed in the Section IV.L, Tribal Cultural Resources, of the Draft EIR and the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion regarding the information presented in the Ethnographic Overview of the Tribal Cultural Resources Report and why it adequately characterizes the cultural setting and existing conditions of the Project Site.

Comment No. 26-E.2-100

80.	Appendix C.2 Tribal Cultural Resources Report C	17	The largest, and best documented, ethnographic Tongva village in the vicinity was that of Yanga	Does not mention 5-volume report on Guaspet. Information must be included and assessed.
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Response to Comment No. 26-E.2-100

Refer to Response to Comment No. 26-E.2-57 regarding the omission of Guaspet.

Comment No. 26-E.2-101

81.	Appendix C.2 Tribal Cultural Resources Report C	18	The La Brea Tar Pits area (CA-LAN-159) was a known area of Native American use for hunting and the gathering of tar (Westec 1983).	Does not mention early burial at this site. Information must be included and assessed.
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Response to Comment No. 26-E.2-101

The Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR emphasizes the utilitarian aspect of the La Brea Tar Pits in terms of the importance as an asphaltum (tar) source for Native Americans. As the commenter notes, the archaeological record—designated as CA-LAN-159—includes the remains of a Native American female, historically referred to as the La Brea Woman. The details of the discovery have been disclosed to the public since the time they were encountered in 1914. The presence of the human remains is one of several reasons why CA-LAN-159 is an important Native American site, which also includes many other cultural items. Even though the presence of the human remains was not made explicit in the references to CA-LAN-159, it is precisely because of the importance and uniqueness of the site that the La Brea Tar Pits are repeatedly mentioned in the Tribal Cultural Resources Report and Section IV.L, Tribal Cultural Resources, of the Draft EIR. The addition of this detail about the human remains from CA-LAN-159 does not substantially change the significance or prominence of the site. Instead, this detail only further emphasizes the importance of the La Brea Tar Pits that is already recognized in the Tribal Cultural Resources Report and Section IV.L, Tribal Cultural Resources, of the Draft EIR.

Page VI-24 of Section VI, Other CEQA Considerations, of the Draft EIR states that the potential exists to uncover existing but undiscovered human remains, and then cites existing regulations that address the discovery of human remains interred outside of dedicated cemeteries. As mentioned on page IV.L-5 in Section IV.L, Tribal Cultural Resources, of the Draft EIR, the La Brea Tar Pits are located approximately 0.6 mile south of the Project Site. At this distance, the additional information about the human remains from CA-LAN-159 are not directly relevant to the analysis of impacts of the proposed Project on tribal cultural resources, and incorporating this information does not result in any new or substantially more significant impacts than what were analyzed and disclosed in the Tribal Cultural Resources Report and Section IV.L, Tribal Cultural Resources, of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion regarding Native American land uses at the La Brea Tar Pits and the archaeological record designated as CA-LAN-159. The Supplemental Cultural Memo discusses why the information presented in the Tribal Cultural Resources Report adequately considered the influence of the site in characterization of existing conditions and analysis of potential impacts to tribal cultural resources.

Comment No. 26-E.2-102

82.	Appendix C.2 Tribal Cultural Resources Report C	20	4.3.1 Spanish Period	Section is focused on missions in San Diego area. Why? What's the relevance? While, inexplicably, irrelevant information is included, relevant information regarding LA
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				Basin is missing. Information must be included and assessed.
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Response to Comment No. 26-E.2-102

The mention of Mission San Diego de Alcaláin is expressly stated in terms of the mission being the first of 21 that were constructed in California by the Spanish in the eighteenth century. The final paragraph of this section, which is on page 20 of the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, specifically discusses the elements of the Spanish colonial system that were constructed in what became the greater Los Angeles Area, namely Mission San Gabriel Arcángel and Mission San Fernando Rey de España. The section also cites the origin of the placename Los Angeles by way of reference to the Spanish name given to the river: Nuestra Señora la Reina de los Angeles de la Porciúncula. Refer to Response to Comments Nos. 13-7 and 26-42 regarding how the historical background and context were adequately considered in the Draft EIR, which includes an account of the Spanish Period.

Comment No. 26-E.2-103

83.	Appendix C.2 Tribal Cultural Resources Report C	20	Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Kyle 2002).	Mission San Gabriel was the most important mission in the area and is barely mentioned. The TCR should be revised to include a comprehensive analysis of the importance of the Mission San Gabriel to the area.
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Response to Comment No. 26-E.2-103

As the commenter states, Mission San Gabriel plays an important role in California history during the Spanish Period. The discussion of the historical periods is explicitly presented as an overview in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and as referenced in Section IV.B, Cultural Resources, and Section IV.L, Tribal Cultural Resources, of the Draft EIR. The historical overview is intended to provide generalized summaries of critical points, which is why Mission San Gabriel is mentioned here, and maps showing its location are included in the Tribal Cultural Resources Report, for example on pages 35, 37, and 39. A comprehensive analysis of Mission San Gabriel is not warranted because it is only indirectly related to the analysis of the potential for impacts to cultural and tribal cultural resources. Refer also to Response to Comments Nos. 13-7 and 26-42 regarding the other considerations given to the historical context where it is more directly related to the Project Site, which provides a reasonable account of the existing conditions for the Project Site. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides additional discussion and expert opinion

regarding the relevance of Mission San Gabriel to the analysis of the Project Site and how the existing conditions are adequately characterized. Additional information on the Mission San Gabriel would only serve to further reinforce the conclusions already reached based upon the existing source material and would be unlikely to identify any new or substantially more significant impacts than what were analyzed and disclosed in the Tribal Cultural Resources Report and Section IV.L, Tribal Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-104

84.	Appendix C.2 Tribal Cultural Resources Report C	23	5.1.1 Previously Conducted Cultural Resource Studies	½-mile radius records search is too small to capture relevant resources.
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Response to Comment No. 26-E.2-104

Refer to Response to Comment No. 26-42 regarding the records search radius.

Comment No. 26-E.2-105

85.	Appendix C.2 Tribal Cultural Resources Report C	28	The Gilmore Adobe was constructed in 1852 and was in use until 1880.	The Adobe was possibly constructed in 1828. This date is stated in a Getty Center report regarding damage from the 1994 Northridge earthquake. Further research and documentation of the adjacent the Adobe complex is warranted.
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Response to Comment No. 26-E.2-105

Refer to Response to Comment Nos. 13-7, 26-42, 26-E.2-12 regarding the considerations given to the Gilmore Adobe, specifically, and the historic context in general. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, provides further information concerning the discrepancy in the date for the construction of the Gilmore Adobe. The Supplemental Cultural Memo reinforces that the construction date of 1852 is based on reliable sources and that further discussion of the alternative interpretations for this date do not offer substantively new information on the potential for archaeological or tribal cultural resources within the Project Site. Thus, this is a minor detail specific to the Gilmore Adobe, which has otherwise been adequately described as part of the existing conditions and where relevant to the analysis of potential tribal cultural resources in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and Section IV.L, Tribal Cultural Resources, of the Draft EIR. Additional analysis of the Gilmore Adobe is unlikely to result in any new or substantially more significant impacts to cultural or

tribal cultural resources than what were analyzed in the Section IV.B, Cultural Resources, and Section IV.L, Tribal Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-106

86.	Appendix C.2 Tribal Cultural Resources Report	30	Artificial fill soils: characterized as dark brown to dark gray mixture of silty clays, sandy silts, silty and clayey sands, and sands	Geotechnical report does not call these “artificial fill.” This inconsistency should be corrected.
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Response to Comment No. 26-E.2-106

Response to Comment No. 26-E.2-15 addresses the terminology used to characterize interpretation of the soil stratigraphy based on the results of the geotechnical investigation. Page 30 of the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) refers to “artificial fill” as distinct from “native soils,” and in this context is intended as an interpretation of sediment profiles presented in the Preliminary Geotechnical Engineering Investigation (Appendix E.1 of the Draft EIR). The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, gives further discussion on why the difference in terminology between the two reports is a minor detail that has no bearing on the conclusions of the analysis for potential impacts to archaeological and tribal cultural resources. As this comment is clarifying a minor detail related to the discussion of existing conditions and does not result in any new or more substantial impacts to tribal cultural resources, no further response is warranted. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.2-107

87.	Appendix C.2 Tribal Cultural Resources Report	30	The report states that the one boring (Boring #8) that encountered fill up to 20 feet below ground surface was most likely the result of backfill within a previous drainage that originally traveled through the west side of the Project Site.	The presence of a drainage greatly increases the chance of cultural material being present in the project area. Additional assessment should be completed.
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Response to Comment No. 26-E.2-107

Refer to Response to Comment No. 26-E.2-15 regarding the presence of the drainage and the assessment of potential archaeological and tribal cultural resources.

Comment No. 26-E.2-108

88.	Appendix C.2 Tribal Cultural Resources Report C	35	Figure 3	This is the oldest map in the report and is from 1937. Additional research is needed. Does the original <i>diseño</i> exist?
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Response to Comment No. 26-E.2-108

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the sources and evidence used to provide an adequate characterization of the existing conditions, including the periods prior to 1937.

Refer to Response to Comment No. 26-E.2-13 regarding the analysis of historical maps, which applies to the “diseño,” or design, for Rancho La Brea, and the relationship to the analysis of archaeological and tribal cultural resources. A digital copy of the 1840s diseño for Rancho La Brea, titled “Diseño del sitio llamado La Brea,” directly translated to “Design of the site called La Brea,” is available through the Bancroft Library at the University of California, Berkeley.

Comment No. 26-E.2-109

89.	Appendix C.2 Tribal Cultural Resources Report C	40	Figure 6	This map shows many villages in the area, but the section of the text referring to this map says there are no villages in the area. This inconsistency should be corrected. Additional information regarding the villages should be provided and the DEIR recirculated.
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Response to Comment No. 26-E.2-109

Refer to Response to Comment No. 26-E.2-60 regarding the discussion of villages from the map analysis and use of terminology used to characterize geographic proximity to the Project Site.

Comment No. 26-E.2-110

90.	Appendix C.2 Tribal Cultural Resources Report	Pages 7–10		Evaluation of potential project impacts to historical archaeological resources is required under CEQA and the Los Angeles Cultural Heritage Ordinance. The report does not include adequate evaluation or treatment
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				considerations for potential archaeological resources from the historical period.
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Response to Comment No. 26-E.2-110

Refer to Response to Comment Nos. 13-7, 26-42, and 26-44 regarding the analysis of archaeological resources, including historical archaeological resources under CEQA. Also refer to Response to Comment Nos. 26-E.2-11 and 26-E.2-93 for summaries of the same topic in terms of why the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) is one of many sources used to inform this analysis.

Comment No. 26-E.2-111

91.	Appendix C.2 Tribal Cultural Resources Report	Pages 20– 22		<p>The section presenting the historical-period cultural setting for the project area is a general history of the Los Angeles area. This section should include a narrative of historical events and land use patterns within the project area. For example, these topics should be included: Rancho La Brea, Salt Lake Oil Field/La Brea Oil Field/Hancock and Gilmore oil exploration and development, Gilmore Ranch/Adobe, Beverly-Fairfax neighborhood, Original Farmers Market, Gilmore Stadium/Gilmore Field, commercial development in the project area (gas stations, restaurants, miniature golf course, etc.), and development of Television City.</p> <p>The TCR report only invokes the Citywide Historic Context Statement with regard to the Entertainment Industry Context. Other contexts pertaining to earlier land use in the project area should be included in the TCR and the DEIR recirculated.</p>
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Response to Comment No. 26-E.2-111

The commenter suggests that a more detailed discussion of past development on the Project Site and surrounding uses (the majority of which has long since been demolished save for the Gilmore Adobe and The Original Farmers Market) is necessary. However, this discussion was included in the 2018 Historic Resource Assessment prepared by ARG, which was included as Appendix D in the Historic Report (Appendix C.1

of the Draft EIR). In addition, information relative to the historical uses of the Project Site and surrounding uses was provided on pages IV.B-16 through IV.B-19 of the Draft EIR and pages 13 through 39 of the 2018 Historic Resource Assessment prepared by ARG. The commenter does not provide a reason as to why additional detail about those matters is necessary for the purposes of CEQA. Refer to Response to Comment No. 26-E.2-58 addressing why further analysis of the historical information specifically dealing with the Gilmore Adobe and Rancho La Brea were adequately described on pages IV.B-16 through IV.B-34, IV.B-57, and IV.B-58 in Section IV.B, Cultural Resources, of the Draft EIR, and considered in Section IV.L, Tribal Cultural Resources, of the Draft EIR. Further information on historical land uses is provided in Response to Comment Nos. 13-7, 26-42, and 26-E.2-12. Regarding the need for the Tribal Cultural Resources Report to address the historical context topics referenced in the comment, the level of detail already included in the Tribal Cultural Resources Report is adequate for purposes of characterizing the existing conditions and analyzing tribal cultural resources.

The commenter states that the Tribal Cultural Resources Report should expand the discussion of the historical land uses and incorporate a variety of distinct historical context sections. Response to Comment No. 26-E.2-58 addresses how the Tribal Cultural Resources Report includes an adequate level of detail describing the historical context for the Project Site. Response to Comment No. 26-42 provides additional information regarding those historical land uses were incorporated into the analysis of archaeological resources as discussed in Section IV.B, Cultural Resources, of the Draft EIR. The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, also provides a further summary of the sources used in the description of the historical context and characterization of the existing conditions for the Project Site, which is applicable to the analysis of both archaeological and tribal cultural resources. Having further considered these sources, the Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR. The Supplemental Cultural Memo provides expert opinion confirming that including more information on the historical land uses in the Tribal Cultural Resources Report would also not result in new or substantially more significant impacts being identified to tribal cultural resources.

Comment No. 26-E.2-112

92.	Appendix C.2 Tribal Cultural Resources Report	Section 5, Background Research Pages 23–28		CHRIS/SCCIC Records Search. The lack of previously recorded resources identified during the CHRIS records search does not indicate a lack of sensitivity for important buried archaeological deposits across the project area. The TCR report must include an analysis of archaeological sensitivity based on (1) the results of the SCCIC records search, (2) field
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			observations, and (3) archival and background research.
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Response to Comment No. 26-E.2-112

The summary of the CHRIS records search results from the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR summarizes some information that is used in the assessment of archaeological resources presented in Section IV.B, Cultural Resources, of the Draft EIR, but it does not offer an opinion on the archaeological sensitivity. Refer to Response to Comments Nos. 13-7, 26-42, and 26-44 regarding the multiple data sources used to characterize the potential for buried archaeological deposits and the adequacy of the identification and analysis as presented in Section IV.B, Cultural Resources, and Section IV.L, Tribal Cultural Resources, of the Draft EIR. As specified in these responses, the sources include the CHRIS records search results, a substantial photographic record of recent Project Site conditions, and research materials presented in the technical reports appended to the Draft EIR. Refer to Response to Comment No. 2644 regarding the interpretation of the CHRIS records search results in terms of archaeological sensitivity. As specified in this response, Section IV.B, Cultural Resources, of the Draft EIR acknowledges the Project Site's sensitivity for archaeological resources and references the content of the CHRIS records search to support this conclusion. The Supplemental Cultural Memo included in Appendix FEIR-14 of this Final EIR provides further clarification of how the information presented in the Draft EIR and various technical reports support the impact analysis and conclusions presented in the Section IV.B, Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-113

93.	Appendix C.2 Tribal Cultural Resources Report	Section 6, Findings and Recom- mendations, Page 43		<ol style="list-style-type: none"> 1. This section contains no findings or recommendations for potential intact, buried archaeological resources dating from the historical period. The section should include an analysis of sensitivity for such resources across the project area. 2. Mitigation Measure CUL-MM-1 does not adequately provide for the treatment of potential impact to buried archaeological resources dating from the historical period. Archaeological construction monitoring is an insufficient treatment for these potential resources. Adequate analysis of archival data can provide the needed information to prevent unanticipated discoveries
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				during construction.
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Response to Comment No. 26-E.2-113

Regarding the assessment of the likelihood for buried resources, see Response to Comment No. 26-42 for the discussion of the process for characterizing the existing conditions and identifying the potential for buried archaeological resources, especially those similar in nature to those recorded for CA-LAN-3045H. Response to Comment No. 13-7 addresses which archival information was considered in the analysis of archaeological and tribal cultural resources, including data on historical uses. Response to Comment Nos. 13-7 and 26-42 also address the use of the data acquired during preparation of and presented in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) in terms of its use in the analysis of archaeological resources, including those that are historic-in-age, in Section IV.B, Cultural Resources, of the Draft EIR. Refer to Response to Comment No. 26-44 regarding how the provisions put forward in Mitigation Measure CUL-MM-1 provide an adequate means of reducing potentially significant impacts to archaeological resources. Response to Comment No. 26-44 also provides further clarification regarding the meaning of unanticipated resources and the relationship to the assessment of potential impacts to archaeological sites and how the proposed mitigation avoids or reduces potentially significant impacts. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

The Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, adds further detail to the analysis of buried resources, use of archival data, and adequacy of the proposed mitigation measure Mitigation Measure CUL-MM-1; the conclusion stated therein further reinforces the findings presented in the Draft EIR.

Comment No. 26-E.2-114

94.	Appendix C.2 Tribal Cultural Resources Report	Introduction, Project Description, Pages 1–2	Entire Section 1.3	The Project Description in the TCR report does not match the DEIR project description in that it fails to include the maximum height of the proposed construction. This inconsistency must be corrected.
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Response to Comment No. 26-E.2-114

As discussed on pages IV.H-24 through IV.H-26 of Section IV.H, Land Use and Planning, of the Draft EIR, the proposed Project would have various floor levels and building heights, ranging from one-story high-bay sound stages to an office building with a

maximum height of 225 feet. Since there is sufficient space available across the studio campus, the subterranean parking garage can extend throughout the majority of the campus to meet the parking demands, and, therefore, requiring shallower excavations and providing a more efficient design. The Project would not exceed the maximum building height of 225 feet or the maximum excavation depth of 45 feet. Any discrepancies in the reporting of the maximum height of the proposed construction would have no influence on the impact analysis for tribal cultural resources that have only been identified as below grade in this fully urbanized portion of Los Angeles. No such tribal cultural resources were identified within a 0.5-mile radius of the Project Site were identified in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and there is no indication that a variation in the maximum height of Project elements would have any influence on the analysis of tribal cultural resources as reported in Section IV.L, Tribal Cultural Resources, of the Draft EIR. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.2-115

95.	Appendix C.2 Tribal Cultural Resources Report	Regulatory Setting, Section 2.1.1, Page 7	According to PRC Section 5024.1(c)(1-4), a property may be listed as a historical resource in the CRHR if it meets at least one of the following NRHP criteria:	<p>While it is true that the criteria for the CRHR and the NRHP are similar, the focus of the CRHR is very different than the NRHP, with a much more California-focused emphasis.</p> <p>The criteria listed in this section state they are the NRHP criteria, but this specifically mentions California, which the NRHP does not mention. The TCR report has a muddled and confused discussion on the relationship between CEQA and NRHP criteria for historic properties/historical resources.</p> <p>The CRHR criteria are the correct ones to list.</p>
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Response to Comment No. 26-E.2-115

The commenter states that despite the similarity in eligibility criteria, the focus of the CRHR and NRHP are very different because the CRHR emphasizes California. The commenter states that this distinction between the CRHR is not clearly stated in the summary of the CRHR in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR), although the CRHR criteria are noted as being correctly stated.

The Tribal Cultural Resources Report presents the CRHR criteria in a context emphasizing the fact that when the state criteria were created, they were based upon a pre-existing set of federal criteria. This is established by the sentence preceding the commenter's quoted passage on page 7 of the Tribal Cultural Resources Report: "The criteria for listing resources in the CRHR were developed in accordance with the criteria for listing in the NRHP, enumerated below." Before listing the CRHR criteria, the Tribal Cultural Resources Report cites the correct section of the PRC in defining a historical resource as any property listed on the CRHR. As the commenter notes, the CRHR criteria are then correctly listed. A subsequent passage on the same page of Tribal Cultural Resources Report then goes on to clarify that the "criteria for the CRHR are nearly identical to those for the NRHP" and correctly states that properties listed or eligible for listing on the NRHP are automatically listed in the CRHR. Elsewhere in the discussion of the CRHR in the Tribal Cultural Resources Report, passages are included that recognize other ways in which a resource may be listed as eligible CRHR that are specific to California, that is, being listed as a state historical landmark, point of interest, listing under local ordinances, and identified through local historical resource surveys.

When placed in the context of the broader discussion of the CRHR, the confusion noted by the commenter appears to derive from the reference to the NRHP in the quoted sentence: "According to PRC Section 5024.1(c)(1–4), a property may be listed as a historical resource in the CRHR if it meets at least one of the following *NRHP* criteria" (emphasis added). Removing "NRHP" from this sentence would clarify that these are the CRHR criteria given in PRC Section 5024.1(c), which were originally derived from the NRHP criteria and are very similar in wording but would not substantially change the summary of the CRHR and how CRHR status factors into the definition of a tribal cultural resource. It is also noted that this specific wording was not incorporated into the discussion of the CRHR given on page IV.B-10 of Section IV.B, Cultural Resources, of the Draft EIR.

Response to Comment No. 26-E.2-36 gives additional context in terms of the relationship of federal and State regulations to the analysis of archaeological and tribal cultural resources.

Comment No. 26-E.2-116

96.	Appendix C.2 Tribal Cultural Resources Report	Regulatory Setting, Section 2.1.2, Page 8	PRC Section 21083.2(g) defines "unique archaeological resource."	The definition of unique archeological resource should be included in the report text.
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Response to Comment No. 26-E.2-116

The passage on page 8 of the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) that is referenced by the commenter is taken from a bulleted list of regulations that are introduced as having relevance under CEQA when analyzing “archaeological, historic, and TCRs.” The report focuses upon the analysis of tribal cultural resources. The Tribal Cultural Resources Report cites PRC Section 21074 as the regulation defining a tribal cultural resource and summarizes two of the critical criteria. The summary level description in the Tribal Cultural Resources Report omitted subsection c of PRC Section 21074, which clarifies the law and fact that a resource can be designated as a tribal cultural resource irrespective of the status as a unique archaeological resource. Thus, omission from the summary of PRC Section 21074 or further analysis in the Tribal Cultural Resources Report is appropriate. Notably, the definition of a unique archaeological resource is included on page IV.B-10 of Section IV.B, Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-117

97.	Appendix C.2 Tribal Cultural Resources Report	Environment al Setting, Section 3.1, Page 11	Soils within the Project Site are dominated by the Urban land–Biscailuz–Pico complex followed by Urban land–Azuvina–Montebello complex in the southeastern corner of the Project Site (USDA 2021).	How is this meaningful? The report should explain the relevance of these soil types to the chances for buried archaeological resources to be present in the project area.
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Response to Comment No. 26-E.2-117

The soil types are referenced here as a means of supplementing the description of physical setting and sediments otherwise stated in the Preliminary Geotechnical Engineering Investigation report in Appendix E.1 of the Draft EIR, and summarized in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The analysis of the potential for buried archaeological resources considers all the available sources, although specific reference back to the USDA classifications cited in the comment are not incorporated into the analysis. Refer to Response to Comment No. 26-42 regarding how geoarchaeological considerations were utilized in the analysis, which were further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 26-E.2-118

98.	Appendix C.2 Tribal Cultural	Environment al Setting,	Entire Section 3.1	Report fails to discuss the two drainages that existed on the
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	Resources Report	Section 3.1, Page 11		property prior to development. The report also fails to discuss the floral and faunal resources that would have been on the property during prehistory. Also, what resources were here that attracted the people who built Rancho La Brea Adobe? The TCR report should be revised to include a discussion on these issues.
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Response to Comment No. 26-E.2-118

Refer to Response to Comment No. 26-E.2-15 regarding the relationship of former stream courses and the assessment of potential archaeological and tribal cultural resources.

Regarding the historical ecology, including flora and fauna, page 19 of the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and page IV.L-8 of Section IV.L, Tribal Cultural Resources, of the Draft EIR, reference the types of plant and animal resources that were important to the Gabrielino (or Tongva).

Regarding the historical context related to the Gilmore Adobe (referenced in the comment as Rancho La Brea Adobe), the topic is only indirectly relevant to the analysis of tribal cultural resources, and as such, this is not discussed in detail in the Tribal Cultural Resources Report. Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the multiple sources included in the Draft EIR that consider the history of the Gilmore Adobe and the manner in which this was factored into the analysis of archaeological resources, as presented in Section IV.B, Cultural Resources, of the Draft EIR.

Comment No. 26-E.2-119

99.	Appendix C.2 Tribal Cultural Resources Report	Cultural Setting, Pages 13–15	Entire Section	The prehistory of the project area is also lacking. Yangna is mentioned but not Guaspet, which was equidistant. It is also close to the Baldwin Hills sites for earlier prehistory. How would the project area have been used during the different periods of prehistory? No discussion is included and should be added. There are also errors in the prehistoric background as discussed herein; e.g., mortars and pestles not introduced until 500 B.P. and the Gabrielino only cremated their dead.
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			No mention of La Brea Woman.
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Response to Comment No. 26-E.2-119

Refer to Response to Comment No. 26-E.2-57 regarding the subject of Guaspet and the characterization of the prehistoric overview.

Refer to Response to Comment No. 26-E.2-12 regarding the discussion of mortar and pestle and its relevance to the discussion of existing conditions.

Refer to Response to Comment Nos. 26-E.2-12 and 26-E.2-92 regarding the topic of Gabrielino burial practices.

Refer to Response to Comment No. 26-E.2-101 regarding La Brea Woman.

Comment No. 26-E.2-120

1. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Section 5.1 SCCIC Records Search	Entire Section	Six previous studies overlap the project area. Due to restrictions imposed by the COVID-19 pandemic, the SCCIC only provided copies of two of these reports. Are those restrictions still in place? Did the TCR report authors attempt any other means of acquiring the reports such as internet searches, library searches, contacting report authors, or contacting other cultural resource consulting firms?
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Response to Comment No. 26-E.2-120

Refer to Response to Comment No. 26-42 regarding the studies identified in the CHRIS that were not available at the time originally requested.

Comment No. 26-E.2-121

2. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Page 27, LA-1057	Review of <i>Technical Report—Historical/Architectural Resources—Los Angeles Rail Rapid Transit Project “Metro Rail” Draft Environmental Impact Statement and Environmental Impact Report</i> (Westec Services, Inc. 1983)	The TCR states that the property located at 7800 Beverly Blvd., which was included as a subject of study in the Westec Services report, is located in the TVC 2050 project area and that a resource at that address was found to appear not eligible for listing in the NRHP at that time. The reasons for the finding of not eligible
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				is not explained. Now that nearly 40 years has lapsed since that evaluation, the TCR report should consider if it might now be eligible with the passage of time.
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Response to Comment No. 26-E.2-121

As noted in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR), the report by Westec Services references a property located at 7800 Beverly Boulevard, which they note as “CBS Television City Parking Lot.” This is in reference to a potential historical resource and not an archaeological or tribal cultural resource. The Project Site, including the buildings that compose Television City, have since been recorded and the Primary Studio Complex has been designated as a historical resource. Discussion of the 1983 results is irrelevant to the analysis of archaeological and tribal cultural resources. Further analysis of this topic is provided in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which confirmed that the analysis of this property is not relevant to the analysis of archaeological or tribal cultural resources.

A full account of the historical resources assessed for the Project is included in the Historic Report in Appendix C.1 of the Draft EIR and Section IV.B, Cultural Resources, of the Draft EIR. Refer also to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding evaluation and designation of the Primary Studio Complex. As discussed therein, the entire Project Site was evaluated and only the Primary Studio Complex was determined to be eligible.

Comment No. 26-E.2-122

3. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Table 2, Page 27	Previously recorded resource CA-LAN-3045H	Previously recorded resource CA-LAN-3045H (Gilmore Adobe) is noted as being located less than 50 feet away from the TVC 2050 property, but there is no discussion in the TCR report on the history of the Adobe and the extent of activities related to the Adobe that might have included portions of the project area. This is a significant omission.
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Response to Comment No. 26-E.2-122

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the issue of archaeological resources and the historical activities associated with the Gilmore Adobe.

Comment No. 26-E.2-123

4. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Section 5.2, Historical Maps	Entire Section	The TCR report relies exclusively on HistoricAerials.com for the topographic map and aerial photograph review. The report fails to consult rancho maps, GLO maps, Sanborn Fire Insurance maps, and other historical maps. The TCR also fails to review other sources of historical aerial imagery such as those contained in the project proponents Phase 1 Hazmat report. Historical aerial photographs by Spence and Fairchild are readily available. Overall, more archival research is necessary.
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Response to Comment No. 26-E.2-123

Refer to Response to Comment No. 26-E.2-13 regarding the use of historical maps, including topographic maps, aerials, rancho, GLO, and Sanborn maps. Refer to Response to Comment Nos. 13-7 and 26-42 regarding a more comprehensive discussion of the archival sources used to assess archaeological and tribal cultural resources.

Comment No. 26-E.2-124

5. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Section 5.2, Historical Maps	Entire Section	The report fails to include any relevant tax assessor's data regarding past land use. For example, was any part of the project area prior to the construction of Gilmore Stadium in 1932 taxed on any improvements?
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Response to Comment No. 26-E.2-124

Tax assessor data from the early twentieth century would be more appropriate to include in an analysis of archaeological resources. Incorporating this level of detail in the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) is unnecessary given that the report focuses on tribal cultural resources. Regarding the analysis of archaeological resources, refer to Response to Comment No. 26-42, which discusses the analysis of the land use history at the Project Site. This analysis includes but is not limited to data presented in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. The land use history is further assessed in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR. Given the available evidence

already incorporated into the analysis, even if the tax assessor information were available, it would merely add a minor amount of detail to the substantive evidence already compiled and used to characterize the existing conditions and inform the analysis and recommended mitigation to archaeological resources. Therefore, such information would not change the ultimate conclusions in the Draft EIR concerning impacts to archaeological resources and the recommended mitigation measure.

Comment No. 26-E.2-125

6. 6	C Appendix C.2 Tribal Cultural Resources Report 2	Background Research, Table 3	The first historic aerial photo from 1948 reveals a large oval-shaped structure in the northwest section of the Project Site. There is also an indiscernible structure in the southeastern portion of the Project Site.	The TCR report fails to contextualize the aerial photograph data. For example, a quick internet search shows the “large oval-shaped structure” is Gilmore Stadium. The report should attempt to identify each structure or feature visible in the historical aerials.
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Response to Comment No. 26-E.2-125

The review of aerial photographs included in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR is intended to convey a basic sense of ground disturbances, especially those represented by the presence of new structures, regardless of their specific historical context. Thus, in this example noted by the commenter, the relevant information about the presence of Gilmore Stadium was the existence of a large structure in the northwest portion of the Project Site. As a report focused on a review of tribal cultural resources, the historical developments and ground disturbances are relevant in that they influence the likelihood any previously buried Native American cultural items may have been physically displaced or destroyed, as well as reflecting general changes in the environmental setting. In providing an overview of the aerial photograph sample, the Tribal Cultural Resources Report provided a reasonable basis on which to assess alterations to the Project Site. The historical ground disturbances are one of the factors supporting the conclusion that subsurface soils are unlikely to support intact tribal cultural resources. Therefore, additional interpretation of the aerial images would only serve to further support this conclusion and there would not be any new or substantially more significant impacts identified. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.2-126

7. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Section 5.3 Geotechnica	Entire Section	The review of the project geotechnical report should include a map showing the location of each boring location. Further, the TCR
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		I Report Review, Pages 29–30		<p>report merely summarizes the general finding of the geotechnical report regarding soils and does not interpret the soils data regarding the potential for buried archaeological deposits to be present. For example, the logs of several borings document the presence of dark gray to black or dark brown to black sediments present immediately below the fill. Dark sediments can sometime indicate the presence of anthrosols or other sediments with potential for containing cultural resources.</p> <p>This section also mentions that a previous drainage originally crossed through the west side of the project site, but this information is not included in the Environmental Setting section.</p>
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Response to Comment No. 26-E.2-126

A map of the geotechnical bores is included as attachments, or enclosures, to the Preliminary Geotechnical Engineering Investigation report in Appendix E.1 of the Draft EIR. Refer to Response to Comment No. 26-42 regarding the considerations given to geoarchaeological data, and Response to Comment Nos. 26-E.2-15 and 26-E.2-117 regarding the analysis of specific soils referenced in the geotechnical bore logs.

Refer to Response to Comment No. 26-E.2-15 regarding the discussion of the former stream course identified within the Project Site and the characterization of the environmental setting provided in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Comment No. 26-E.2-127

8. 6	Appendix C.2 Tribal Cultural Resources Report	Background Research, Section 5.4 Native American Correspondence, Page 31	Entire Section	<p>The NAHC Sacred Lands File search request identified eight Native American individuals who would potentially have specific knowledge pertaining to Native American cultural resources in the project area region. Typically, each individual should be contacted by mail, e-mail, and telephone by the archaeologists as part of their records-search/information-gathering process. The TCR report states that no additional tribal outreach was conducted, and</p>
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				<p>the report instead relies on the AB-52 Consultation conducted by the City. The Sacred Lands File search tribal list is not identical to the AB-52 list and at least three individuals named by the NAHC who might have information relevant to the project area were not contacted during the AB-52 consultation. What additional outreach was taken? If none, why not?</p> <p>The project is being implemented through a Specific Plan and General Plan amendment. This requires tribal consultation following the requirements of SB-18. There is no documentation of SB-18 consultation in any of the cultural resource documents. SB-18 consultation is not the same as AB-52 consultation and involves different time frames for tribes to respond to the notification. Has the project complied with SB-18?</p>
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Response to Comment No. 26-E.2-127

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the tribal outreach efforts completed for the Project, the means by which tribal consultation requirements were fulfilled pursuant to PRC Section 21080.3.1, as amended by AB 52, and why the requirements of SB 18 do not apply.

Comment No. 26-E.2-128

9. 6	Appendix C.2 Tribal Cultural Resources Report	Findings and Recommendations, Section 6.1, Summary of Impacts, Page 43	The history of past disturbance within and in the vicinity of the Project Site, as reflected by the records searches, review of historical topographic maps and aerial photographs, and the subsurface exploratory boring investigations, suggest that subsurface soils are unlikely to support intact TCRs	There is no meaningful discussion in the body of the report regarding the potential for subsurface resources to be present. This “summary” is presenting this opinion for the first time that buried resources are unlikely. While the NAHC Sacred Lands File search did not locate any tribal cultural resources within the project area, follow-up with affiliated tribes is necessary. The standard letter from the NAHC states that negative results do not negate the possibility of those types of resources being present and therefore suggests reaching out to tribes affiliated with the area (the
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				NAHC provided a contact list). It appears that no tribal outreach was conducted, as recommended by the NAHC. What tribal outreach was conducted?
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Response to Comment No. 26-E.2-128

Refer to Response to Comment No. 26-42, regarding the analysis of potential subsurface tribal cultural resources presented in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, and Section IV.L, Tribal Cultural Resources, of the Draft EIR. Additional consideration of the geoarchaeological data is given in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR, which did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the efforts made to contact tribes for information on sacred lands pursuant to the NAHC's recommendations and the tribal consultation requirements that were fulfilled pursuant to PRC Section 21080.3.1.

Comment No. 26-E.2-129

10. 6	Appendix C.2 Tribal Cultural Resources Report	Section 2— Regulatory Setting	Discussion of AB 52	Another regulation that applies to the project is SB 18, as there is a specific plan proposed for the TVC. There is no mention of SB 18 in this section of the report. Has the project complied with SB-18?
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Response to Comment No. 26-E.2-129

Refer to Response to Comment No. 26-E.2-17 addressing why the requirements of SB 18 do not apply to the Project.

Comment No. 26-E.2-130

11. 6	Appendix C.2 Tribal Cultural Resources Report	Section 2— Regulatory Setting	Discussion of the California Register of Historical Resources (CRHR)	Is there any federal nexus for this project? If so, there is no substantive mention of the National Register of Historic Places outside of similarities to the CRHR.
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Response to Comment No. 26-E.2-130

Refer to Response to Comment No. 26-E.2-36 regarding the subject of a federal nexus and discussion of the regulatory framework, including the relationship between the NRHP and CRHR. The Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR focuses upon state regulations in terms of defining a tribal cultural resource, and as such, the detailed discussion of NRHP eligibility thresholds was excluded in the Tribal Cultural Resources Report.

Comment No. 26-E.2-131

12. 6	Appendix C.2 Tribal Cultural Resources Report	Section 2.1.3— Regulatory Setting	Discussion of Health and Safety Code Section 7050.5	The NAHC not only notifies the MLD, it also will specifically appoint an MLD for a particular project.
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Response to Comment No. 26-E.2-131

The distinction between appointing and notifying an MLD in the NAHC's duties pursuant to the Health and Safety Code has been noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Because the summary included in Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR faithfully reflects the process that must be followed in the event human remains are discovered and confirmed to be Native American in origin, no further response is required. Please note that the discussion of PRC Section 5097.98 included on page IV.L-3 of Section IV.L, Tribal Cultural Resources, of the Draft EIR specifically recognizes that the NAHC designates and notifies the MLD.

Comment No. 26-E.2-132

13. 6	Appendix C.2 Tribal Cultural Resources Report	Section 4— Cultural Setting	Discussion of prehistoric overview	This section appears to principally use work out of San Diego. Why? Importantly, the section does not specifically include a number of local data points, including Playa Vista, important sites in Orange County (like ORA-64 and ORA-264), and Clovis occupation in Malibu, as just a few examples. No mention of early occupation of northern Channel Islands. The prehistoric overview must be revised to include this information.
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Response to Comment No. 26-E.2-132

Refer to Response to Comment No. 26-42 regarding the discussion of the regional context and relevance of sites from the San Diego area. Refer to Response to Comment Nos. 26-E.2-96 and 26-E.2-99 regarding the methodology used to characterize the existing conditions at regional and local levels, although specific sites in Playa Vista, Orange County, Malibu, and the northern Channel Islands are not specified.

Comment No. 26-E.2-133

14. 7	Appendix C.3 AB 52 Notifi- cation Letters and Delivery Confirmations	AB 52 Notifi- cation Letter and Delivery Confirma- tions	Notification Letter	The Project Description does not match the DEIR project description in that it fails to include the maximum height of the proposed construction. This is a critical piece of information to allow the tribes to consider if the proposed project will have an adverse visual effect on any offsite tribal cultural resources.
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Response to Comment No. 26-E.2-133

Refer to Response to Comment No. 26-E.2-114 regarding the lack of relevance between the proposed maximum construction height and the analysis of tribal cultural resources.

Comment No. 26-E.2-134

15. 7	Appendix C.3 AB 52 Notifi- cation Letters and Delivery Confirmations	AB 52 Notifi- cation Letter and Delivery Confirma- tions	Certified Mail Receipts	It is unclear if the "Delivery Confirmations" merely document that the letters were sent by certified mail, or if the receipts are meant to confirm that the letters were actually received by the intended recipient. Were any of the letters returned as undeliverable?
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Response to Comment No. 26-E.2-134

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the tribal outreach efforts completed for the Project and the means by which tribal consultation requirements were fulfilled pursuant to PRC Section 21080.3.1, as amended by AB 52. In compliance with PRC Section 21080.3.1, which requires written notification, the City mailed notification letters to the addresses provided by each of the tribal parties on the City's AB 52 contact list, dated June 1, 2021, and included in Appendix C of the Draft EIR. The City did not receive any returned letters. The Delivery Confirmations from the U.S. Postal

Service validate that the notification letters were sent via certified mail and are not meant to convey whether the letters were physically received by the intended recipients.

Comment No. 26-E.2-135

16. 1	Appendix C.4 Historic Sign Guidelines		Entire Appendix	The Historic Signage Guidance (Appendix C.4) does not include the required visual-resource analysis and landscape analysis studies to consider the effects of the proposed signage on the view shed of the Gilmore Adobe or other historical resources.
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Response to Comment No. 26-E.2-135

Refer to Response to Comment No. 26-E.2-63 regarding aesthetic and historic impacts. Refer to Response to Comment No. 26-129 regarding the Historic Sign Guidelines and proposed signage. As discussed therein, the mere presence of signs within the Project Site (with the exception of those that are located on the Primary Studio Complex or within the Viewshed Restoration Area, which are discussed in Appendix C.4, Historic Sign Guidelines, of the Draft EIR) would not result in impacts to historical resources pursuant to the thresholds in Appendix G of the CEQA Guidelines.

Comment No. 26-E.2-136

17.	DEIR Section IV.D. Geology and Soils	Pages 15– 16; 17–18; 26–28	N/A	The EIR lacks any description of the depths and locations within the project area at which the artificial fill, quaternary alluvium, and (alleged) Palos Verdes Sands are exposed or are expected to be encountered. These data are provided in the geotechnical report (Appendix E).
18. 3	DEIR Section IV.D. Geology and Soils	Page 15	These Pleistocene age alluvial deposits have a moderate to high potential to yield paleontological resources.	See above comment.
19. 3	DEIR Section IV.D. Geology and Soils	Page 15	Previously discovered fossils in the area have been located in older Quaternary age sedimentary deposits known as Pleistocene alluvium and the Palos Verdes Sand	No evidence has been provided that the project area is underlain by the Palos Verdes Sands. In fact, both the geotechnical report and the geologic map used in the paleontological assessment report (Appendix F) seem to provide evidence against the presence of this unit at construction depths. The Palos Verdes Sands are a marine-

				terrace deposit, and the sediments underlying the project area were interpreted as being deposited by fluvial (i.e., river) action (Appendix E, Page 5, Paragraph 1). The apparent inconsistency between DEIR Section IV.D and the information in Appendix F must be corrected.
20. 3	DEIR Section IV.D. Geology and Soils	Page 11	Native soils of older alluvial deposits were encountered beneath the fill soils at the Project Site and are comprised of sandy to silty clays, sandy silts, silty to clayey sands, and sands which are moist to wet, firm to stiff, dense to very dense, fine to coarse-grained, with occasional gravel and cobbles. These native soils consist predominantly of sediments deposited by river and stream action typical to the area of Los Angeles in which the Project Site is located.	The depths at which these native sediments are present beneath the project area is important and should be discussed.

Response to Comment No. 26-E.2-136

Regarding the nature of the underlying geology of the Project Site and the depths of native sediments, refer to Response to Comments Nos. 35-90 and 26-E.2-19. In addition, regarding the potential for the Project area to be underlain by Palos Verdes Sands, the records search results from the Natural History Museum of Los Angeles County reported on fossil localities collected nearby from the Palos Verdes Sand. For instance, one nearby locality, LACM VP 7478, was reported from a depth of 46 feet below the ground surface within the Palos Verdes Sand. Please note that the results of the records search are confidential and cannot be made public since they contain sensitive fossil locality data. However, the results of the records search are on file at the City for review by qualified individuals and are part of the administrative record for the Project.

Comment No. 26-E.2-137

21. 3	DEIR Section IV.D. Geology and Soils	Page 3	As defined by the SVP, significant nonrenewable paleontological resources are:... lead agencies or local governments.	This is an outdated definition and is conflating two separate topics: significance of different paleontological resources and the renewability of paleontological resources. By definition, <i>all</i> paleontological resources (regardless of significance) are
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				nonrenewable, but not all are significant. It would be much more appropriate to include the definition for “significant paleontological resources” from SVP (2010; pg. 11), as it stresses that significant paleontological resources are not just vertebrate remains (which is far less clear in the provided definition).
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Response to Comment No. 26-E.2-137

Refer to Response to Comment No. 35-90 for a discussion of the Draft EIR references to the 1995 and 2010 SVP Guidelines, as well the definition of “significant paleontological resources” from the SVP Guidelines. Also, the comment refers to the discussion in the Draft EIR of the regulatory framework for paleontological resources, including the SVP Guidelines. That section quoted the definition from the 1995 SVP Guidelines of the term “significant nonrenewable paleontological resources.” That definition correctly describes significant paleontological resources as “nonrenewable” because fossils are not considered to be renewable since they require thousands to millions of years to be preserved (greater than approximately 5,000 years per the 2010 SVP Guidelines). The 2010 SVP Guidelines also expressly recognize that significant paleontological resources are “nonrenewable.” The first sentence of the 2010 SVP Guidelines states:

Fossils are nonrenewable paleontological resources that are afforded protection by federal, state, and local environmental laws and regulations.

Comment No. 26-E.2-138

22. 3	DEIR Section IV.D. Geology and Soils	Page 4	only [sic] rarely will a fossil locality yield a statistically significant number of specimens of the same genus	It is not clear what is meant by this. Statistically significant in what way and/or relative to what? In context, this does not seem to make sense.
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Response to Comment No. 26-E.2-138

The commenter refers to a portion of a sentence in the section of the Draft EIR that provides background information on the applicable regulatory framework, including the SVP Guidelines. In particular, this sentence in the Draft EIR, located on page IV.D-4 of Section IV.D, Geology and Soils, states that discovery of “vertebrate fossils are relatively uncommon” because the number of such discoveries are statistically rare and isolated in nature. Accordingly, discoveries of such resources typically do not yield a significant number of specimens of the same type. Accordingly, the Draft EIR correctly concludes that

“every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution.”¹¹⁴ Based on the principle that every vertebrate fossil found can be significant, regardless of the number of fossils found, Mitigation Measure GEO-MM-1 applies to each discovery of a paleontological resource that may be discovered at the Project Site.

Comment No. 26-E.2-139

23. 3	DEIR Section IV.D. Geology and Soils	Page 6	N/A	The EIR regulation section lacks reference to CEQA stipulations regarding paleontological resources, including CEQA Guidelines Appendix G, Section VII[f].
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Response to Comment No. 26-E.2-139

The CEQA Guidelines Appendix G thresholds of significance for geology and soils, which includes paleontological resources, are included on pages IV.D-16 and IV.D-17 of the Draft EIR and are used to analyze potential environmental impacts on paleontological resources in Section IV.D, Geology and Soils, of the Draft EIR. Specifically, the threshold for paleontological resources provided on page IV.D-17 of Section IV.D, Geology and Soils, of the Draft EIR is presented as follows:

Threshold (f): Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Comment No. 26-E.2-140

24. 3	DEIR Section IV.D. Geology and Soils	Pages 15–16; 26–28	N/A	The EIR uses the terms “older, elevated Quaternary alluvial deposits,” “Pleistocene age alluvial deposits,” “older Quaternary age sedimentary deposits,” “Pleistocene alluvium,” “Pleistocene age older alluvial deposits,” and “Palos Verdes Sand” but never addresses whether these are separate geologic units or are being used interchangeably. This text needs to be clarified in order to make it clear what geology
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¹¹⁴ Notably, this same description of the significance of vertebrate fossils that may be found at a site has been concluded in other paleontological resources assessments. See ESA, Inglewood Basketball and Entertainment Center, City of Inglewood, California, Paleontological Resource Assessment Report, May 2019.

				actually underlies the project area and what is its paleontological potential. This issue is partially a holdover from the lack of clarification of the geology/paleontology in Appendix F.
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Response to Comment No. 26-E.2-140

Refer to Response to Comment Nos. 35-90 and 26-E.2-19 for a discussion of the underlying geology at the Project Site, as well as a discussion of the geologic terminology used to describe the sediments underlying the Project Site.

Comment No. 26-E.2-141

25. 3	DEIR Section IV.D. Geology and Soils	Page 27	The services of a Project paleontologist who meets the Society of Vertebrate Paleontology standards... as assistant to a Project paleontologist)	<p>SVP standards for what? This is presumably the SVP standards for a "Qualified Professional Paleontologist," but this needs to be explicitly stated, if so. This also does not include a complete list of qualifications for that position, as stated by SVP (2010). Those qualifications are as follows:</p> <ol style="list-style-type: none"> 1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience. 2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts. 3. Proficiency in recognizing fossils in the field and determining their significance. 4. Expertise in local geology, stratigraphy, and biostratigraphy. <p>Experience collecting vertebrate</p>
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				fossils in the field.
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Response to Comment No. 26-E.2-141

As noted in the comment, Mitigation Measure GEO-MM-1 requires a site-specific Paleontological Resource Mitigation and Treatment Plan prepared by “a Project paleontologist who meets the Society of Vertebrate Paleontology standards.” Refer to Response to Comment No. 35-91 regarding revisions to Mitigation Measure GEO-MM-1. As discussed therein, Mitigation Measure GEO-MM-1 has been clarified to explicitly state the definition of a Qualified Professional Paleontologist under the 2010 SVP Guidelines.

Comment No. 26-E.2-142

26. 3	DEIR Section IV.D. Geology and Soils	Page 27	This Project paleontologist shall supervise a paleontological monitor who shall monitor all ground disturbance activities	<p>No qualifications standards are provided for a paleontological monitor. The SVP (2010) qualifications for a monitor are as follows:</p> <ol style="list-style-type: none"> 1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or 2. AS or AA in geology, paleontology, or biology and demonstrated two years' experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or 3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
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				5. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.
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Response to Comment No. 26-E.2-142

As noted in the comment, Mitigation Measure GEO-MM-1 requires that the “Project paleontologist shall supervise a paleontological monitor who shall monitor all ground disturbance activities.” Refer to Response to Comment No. 35-91 regarding revisions to Mitigation Measure GEO-MM-1. As discussed therein, Mitigation Measure GEO-MM-1 has been clarified to explicitly state the definition of a Qualified Paleontological Resources Monitor under the 2010 SVP Guidelines.

Comment No. 26-E.2-143

27. 3	DEIR Section IV.D. Geology and Soils	Page 27	The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.	4. The minimum information provided by the Paleontological Resource Mitigation and Treatment Plan need to include stipulations for fossil preparation, assignment of an approved repository, and donation of significant paleontological resources to the approved repository.
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Response to Comment No. 26-E.2-143

Refer to Response to Comment No. 35-91 regarding revisions to Mitigation Measure GEO-MM-1. As provided on page IV.D-27 of the Draft EIR, the Paleontological Resource Mitigation and Treatment Plan, required as part of Mitigation Measure GEO-MM-1, “shall specify ... laboratory procedures,” which would generally include preparation of paleontological resources to the point of taxonomic identification. It would also include, but not be limited to, “curation provisions” which outline the museum, for instance, that will serve as the accredited repository of the discovered paleontological resources. The clarified version of the mitigation measure presented in Response to Comment No. 35-91 expressly includes (a) a worker environmental awareness program; (b) the authority of the monitor to stop construction work if resources are discovered; and (c) the preparation of a post-monitoring report.

Comment No. 26-E.2-144

28. 3	DEIR Section IV.D. Geology and Soils	Page 27	Mitigation Measure GEO-MM-1: The services of a... and the Los Angeles Department of City Office of Historic Resources.	The provided mitigation measure misses many portions of mitigation measures appropriate for the project area and geologic unit. This includes review of the Mitigation and Treatment Plan by curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and at the Natural History Museum La Brea Tar Pits and Museum, mandate of a Worker Environmental Awareness Program (WEAP), authority of the paleontological monitor to divert/direct ground-disturbing activities in the event of discovery, and preparation of a final report at the conclusion of monitoring, among others. For examples, see the paleontological mitigation measures in the EIRs for the Metrorail Purple Line (westside subway extension), Academy Museum of Motion Pictures and the Los Angeles County Museum of Art.
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Response to Comment No. 26-E.2-144

Refer to Response to Comment Nos. 35-91 and 26-E.2-20, which discuss the clarified version of Mitigation Measure GEO-MM-1 and consistency with other mitigation measures for projects in the area. The clarified version of Mitigation Measure GEO-MM-1 expressly includes (a) a WEAP; (b) the authority of the monitor to stop construction work if resources are discovered; and (c) the preparation of a post-monitoring report. Refer to Response to Comment No. 35-91 in particular for the text of the clarified mitigation measure.

Comment No. 26-E.2-145

29. 9	Appendix F Paleontological Resources Review Memorandum	General	N/A	The paleontological assessment report lacks description of many of the laws and regulations governing the protection of paleontological resources for the project area. This information should be added.
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Response to Comment No. 26-E.2-145

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Refer also to Response to Comment No. 35-90 for additional discussion regarding the SVP Guidelines. Additionally, Section IV.D, Geology and Soils, of the Draft EIR contains a regulatory framework subsection on pages IV.D-2 through IV.D-8, which includes a discussion of laws and regulations related to paleontological resources, including the SVP Guidelines, California Penal Code Section 622.5, California Public Resources Code Section 5097.5, and the City of Los Angeles Conservation Element.

Comment No. 26-E.2-146

30. 9	Appendix F Paleontol- ogical Resources Review Memorandum	General	N/A	The paleontological assessment report lacks definition of what are paleontological resources and paleontological significance. This information should be added.
31. 9	Appendix F Paleontol- ogical Resources Review Memorandum	General	N/A	The paleontological assessment report lacks discussion of how paleontological significance is assigned and what significance is assigned to (and for what reasons). This information should be added.

Response to Comment No. 26-E.2-146

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with the CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Definitions of paleontological resources and the basis for assigning paleontological significance are both discussed on pages IV.D-3 and IV.D-4 of the Draft EIR, and are based on the SVP Guidelines. The Appendix G significance threshold for impacts to paleontological resources and the L.A. CEQA Thresholds Guide criteria for evaluating impacts to paleontological resources are included on pages IV.D-17 to IV.D-18 of the Draft EIR.

Comment No. 26-E.2-147

32. 9	Appendix F Paleontol- ogical Resources Review Memorandum	General	N/A	The paleontological assessment report lacks definition of the SVP standards for paleontological sensitivity. This information should be added.
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Response to Comment No. 26-E.2-147

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with the CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Refer to Response to Comment No. 35-90 regarding the SVP Guidelines, definitions, and the analysis of paleontological sensitivity in the Draft EIR.

Comment No. 26-E.2-148

33. 9	Appendix F Paleontol- ogical Resources Review Memorandum	General	N/A	The paleontological assessment report lacks description of the mapped geology within the project area or the geology reported in the geotechnical report (Appendix E). This information should be added.
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Response to Comment No. 26-E.2-148

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with the CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. The Preliminary Geotechnical Engineering Investigation (included in Appendix E.1 of the Draft EIR) as well as Draft EIR Section IV.D, Geology and Soils, pages IV.D-11 through IV.D-15, both contain discussions of the mapped geology within the Project Site. Additional information, including the Dibblee map, is included in the Phase I and Phase II investigations included in Appendix G of the Draft EIR. Refer to Response to Comment Nos. 35-90 and 26-E.2-19, which address the underlying geology of the Project Site as it relates to paleontological resources.

Comment No. 26-E.2-149

34. 9	Appendix F Paleontol- ogical Resources Review Memorandum	General	N/A	The paleontological assessment report lacks any description of the depths and locations within the project area at which the artificial fill, quaternary alluvium, and (alleged) Palos Verdes Sands are exposed or are expected to be encountered. This information should be added.
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Response to Comment No. 26-E.2-149

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Refer to Response to Comment Nos. 13-7, 35-90, and 26-E.2-19 regarding the nature, depth and location of the underlying geology of the Project Site.

Comment No. 26-E.2-150

35. 9	Appendix F Paleontol- ogical Resources Review Memorandum	Page 1	These Pleistocene age alluvial deposits have moderate to high potential to yield paleontological resources.	It is not clear what paradigm for paleontological sensitivity is being used here, but it is assumed that the SVP sensitivity scale is being used, as it is the only one discussed within the assessment. However, there is no "moderate" level for paleontological sensitivity within the SVP sensitivity scale. Under SVP, the Quaternary alluvial deposits have a "high potential" for paleontological resources. The statement should be clarified and supported.
36. 9	Appendix F Paleontol- ogical Resources Review Memorandum	Page 2	A paleontological resources program is recommended for excavation within moderate to high sensitivity geological units	See above comment.

Response to Comment No. 26-E.2-150

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Refer to Response to Comment No. 35-90, which addresses the Project Site's paleontological sensitivity and the terminology used when discussing the type of deposits that have a higher potential to contain paleontological resources.

Comment No. 26-E.2-151

37. 9	Appendix F Paleontol- ogical Resources Review Memorandum	Page 2	Previously discovered fossils in the area have been in older Quaternary age sedimentary deposits known as Pleistocene alluvium and the Palos Verdes Sand.... rodent,	Within this paragraph, it is not clear which localities were recovered from the Quaternary alluvial deposits vs. the Palos Verdes Sands. This is important because the Palos Verdes Sands are a marine terrace deposit
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			skunk, horse, and camel at an unstated depth.	and almost certainly do not underlie the project area at construction depths, based on the data from the geotechnical report.
38. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	“Pleistocene alluvium” and the “Palos Verdes Sand”	The Palos Verdes Sands are mentioned multiple times throughout the report, but it is not clear what the authors mean when reporting on this unit. The Palos Verdes Sands have a complicated and contentious definition and nomenclatural history. The lack of discussion of the geology underlying the project area and current understanding of these deposits only serves to muddy the waters here. It is also not clear what the relevance of the Palos Verdes Sands are for the project area, as there appears to be no evidence that they underlie the project area at construction depths (and shouldn't really be expected to, given the modern understanding of this unit). This information should be clarified.

Response to Comment No. 26-E.2-151

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Refer to Response to Comment Nos. 13-7, 35-90, and 26-E.2-19, which address the nature of the underlying geology and sedimentary deposits at the Project Site and the Palos Verdes Sands. Refer to Response to Comment No. 26-E.2-136 regarding the potential for Palos Verdes Sands to occur in the Project area.

Comment No. 26-E.2-152

39. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded	Due to (1) the proximity of the project area to the La Brea asphalt deposits, (2) the fact that Dibblee maps the project area within the same geologic unit as those underlying the Hancock Park, and (3) Dibblee maps the project area within the influence of the Salt Lake Oilfield, it is important to more adequately describe the scientific importance of these asphalt deposits, where they are present, and any geological association.
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			millions of Pleistocene fossil plant, insect, and animal specimens.	
40. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded millions of Pleistocene fossil plant, insect, and animal specimens.	It would be prudent to discuss the possibility of localized asphalt-impregnated deposits within the project area. The possibility of pockets of such deposits within the project area should be discussed and evaluated in the paleontological assessment report.
41. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded millions of Pleistocene fossil plant, insect, and animal specimens.	Although the Page Museum is approximately 4,000 feet from the project area, there are multiple La Brea-type known localities that are significantly (>25%) closer to the project area. This includes, at a minimum, localities north of 6th Street (approximately 3,000 feet south of the project area). Additional information should be included.

Response to Comment No. 26-E.2-152

The Paleontological Resources Review Memorandum was prepared in support of the Draft EIR and was written in accordance with CEQA Guidelines and 2010 SVP Guidelines, as stated in the memorandum. Section IV.D, Geology and Soils, of the Draft EIR outlines the existing soil conditions under Subsection 3, Local Geology (in the first and second paragraphs on page IV.D-11). This discussion details fill deposit thickness, depth, and native deposits that lie underneath. Additionally, refer to Response to Comment Nos. 35-90 and 26-E.2-19 for a discussion of the geology underlying the Project Site. Boring logs are provided as part of the Preliminary Geotechnical Engineering Investigation in Appendix E.1 of the Draft EIR. As stated in Response to Comment No. 26-103, “[f]ollowing

extensive subsurface investigations and sampling, tar was noted only in an isolated area near the southwest boundary of the Project Site where a tar collection pit is located and currently collected and disposed of according to applicable regulations on a regular basis when passively filled. It is not expected that any tar will be encountered during construction nor is construction expected to encounter tar seeps or increase tar removal rates.” In addition, revised Mitigation Measure GEO-MM-1 (refer to Response to Comment No. 35-91) calls for a Paleontological Resource Mitigation and Treatment Plan that will provide protocols for high sensitivity deposits, including asphaltic deposits.

The Dibblee maps referred to in this comment were reviewed and discussed in the Paleontological Resources Review Memorandum. As noted in the comment, both the Draft EIR (page IV.D-15) and the Paleontological Resources Review Memorandum (page 2) acknowledge the presence of fossil localities from Park La Brea approximately 4,000 feet south of the Project Site. The analysis contained in both the Paleontological Resources Review Memorandum (refer to pages 1 and 2 of Appendix F) and Section IV.D, Geology and Soils, of the Draft EIR also addresses the presence of fossil localities closer to the Project Site, including those at distances that are less than 4,000 feet away.

Comment No. 26-E.2-153

39. 9	Appendix F Paleontol- ogical Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded millions of Pleistocene fossil plant, insect, and animal specimens.	Due to (1) the proximity of the project area to the La Brea asphalt deposits, (2) the fact that Dibblee maps the project area within the same geologic unit as those underlying the Hancock Park, and (3) Dibblee maps the project area within the influence of the Salt Lake Oilfield, it is important to more adequately describe the scientific importance of these asphalt deposits, where they are present, and any geological association.
40. 9	Appendix F Paleontol- ogical Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in	It would be prudent to discuss the possibility of localized asphalt-impregnated deposits within the project area. The possibility of pockets of such deposits within the project area should be discussed and evaluated in the paleontological assessment report.

			Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded millions of Pleistocene fossil plant, insect, and animal specimens.	
41. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	Approximately 4,000 feet south of the Project Site, localities LACM 7513-7516 from Park La Brea included fossil specimens of snake, sloth, rabbit, rodent, skunk, horse, and camel at an unstated depth. Numerous additional localities are known from the Rancho La Brea asphalt deposits located in Hancock Park approximately 4,000 feet south of the Project Site, a National Natural Landmark that has yielded millions of Pleistocene fossil plant, insect, and animal specimens.	Although the Page Museum is approximately 4,000 feet from the project area, there are multiple La Brea-type known localities that are significantly (>25%) closer to the project area. This includes, at a minimum, localities north of 6th Street (approximately 3,000 feet south of the project area). Additional information should be included.
42. 9	Appendix F Paleontological Resources Review Memorandum	N/A	N/A	The paleontological assessment report does not appear to connect the “older, elevated Quaternary alluvial deposits” with the “older Quaternary age sedimentary deposits,” “Pleistocene alluvium,” and “Palos Verdes Sands.” It should be stated what is meant by each of these terms, their relevance, and how they interrelate. Some of these units are functionally (and practically) equivalent, but this is not stated in the report. As of now, it is not made clear in the report if <i>any</i> of the localities reported by the records search are from the same geologic unit mapped by Dibblee as underlying the project area.
43. 9	Appendix F Paleontological Resources Review Memorandum	Page 2	have been in older Quaternary age sedimentary deposits	As written, it is not clear whether this is saying that the deposits are older than the ones mapped under the project area or if this is referring to a geologic unit termed the “older Quaternary age sedimentary deposits.” This issue (as well as the one described above) stems from the lack of discussion of the geology within and around the project area.

Response to Comment No. 26-E.2-153

Refer to Response to Comment Nos. 35-90 and 26-E.2-19 for a discussion of the underlying geology at the Project Site, as well as a discussion of the geologic terminology used to describe the sediments underlying the Project Site.

Comment No. 26-E.3-1**Exhibit 3—Shannon & Wilson letter**

This letter presents our geotechnical review and hydrological review of a portion of the Draft Environmental Impact Report (DEIR) for the Television City 2050 Specific Plan (Project). Our understanding of the Project is based on our review of the DEIR and our respective expertise in geology and soils discipline and hydrology and stormwater systems.

Our detailed comments with direct references to the DEIR Sections are also provided in the attached Exhibits 1a and 1b. We have summarized our review comments of the DEIR Sections below in italics.

Response to Comment No. 26-E.3-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.3-2

- **Excavation Support**—The DEIR states that Project excavations may extend to 45 feet below surface. The specific areas of excavation and depths for the Project are not described in the DEIR. Temporary shoring to support proposed excavations is described in the DEIR Sections, consisting of soldier piles with the potential for tieback anchors.

Excavations could impact the properties adjacent to the property line. Temporary shoring should be monitored during excavation along the property line with mitigation plans prepared should ground movement at these locations exceed established thresholds. Tieback anchors, if installed to support the temporary shoring, and could extend into the adjacent properties and should be reviewed and approved by the adjacent property owners prior to their installation. Excavation proposed for the “Project” should be included in revisions to the DEIR. Absent such information, the potential impacts of excavations cannot be adequately assessed.

Response to Comment No. 26-E.3-2

Contrary to the commenter's assertion, the specific areas of excavation and depths are included in the Draft EIR; refer to Figure 3 of the Soil Management Plan, which is included in Appendix G.1 of the Draft EIR.

As discussed in Addendum I, Response to Soils Report Review Letter, prepared by Geotechnologies dated June 3, 2021 (included in Appendix E.3 of the Draft EIR), the Project is currently in the pre-approval process. Preliminarily, a temporary cut-off wall system may be installed for shoring and excavation of the proposed below-grade levels.. Refer to Response to Comment No. 26-71 regarding tiebacks.

The Project's potential impacts associated with excavation were addressed in accordance with CEQA and City policy in Sections IV.A, Air Quality, IV.B, Cultural Resources, IV.C, Energy, IV.D, Geology and Soils, IV.E, Greenhouse Gas Emissions, IV.F, Hazards and Hazardous Materials, IV.G, Hydrology and Water Quality, IV.I, Noise, IV.L, Tribal Cultural Resources, and IV.M, Utilities and Service Systems, of the Draft EIR.

Weekly surveying of the shoring system and the immediate surrounding properties during shoring installation and excavation are required as part of LADBS permit approval process. If ground movement exceeds the regulatory established threshold, the shoring and dewatering design will be re-evaluated and corrective measures will be taken to ensure safety to the Project and to the surrounding properties. As described in the Dewatering Report (Appendix FEIR-13 of this Final EIR), as part of the regulatory requirements for temporary shoring and excavation, construction surveying and monitoring of the surrounding properties immediately surrounding the Project are required for compliance with the Los Angeles Building Code.

Comment No. 26-E.3-3

- **Excavation Dewatering**—Dewatering of groundwater from the excavations is proposed for the Project during construction. Information regarding post-construction dewatering is absent from the DEIR. Our review of the construction dewatering indicates that the drawdown created by unrestrained (i.e., no cut off walls) dewatering could create a cone of depression that would extend hundreds of feet beyond the excavation(s).

Response to Comment No. 26-E.3-3

As discussed in Response to Comment No. 3-7, per Project Design Feature GEO-PDF-1, which is included on pages IV.D-18 to IV.D-19 in Section IV.D, Geology and Soils, of the Draft EIR, the below-grade parking structures will be designed to withstand hydrostatic pressure so that post-construction dewatering will not be necessary.

As described in the Draft EIR and the Dewatering Report in Appendix FEIR-13 of this Final EIR, the temporary dewatering system would include regulatory infiltration control measures, as necessary. Refer to Response to Comment No. 26-69 regarding the incorrect assumptions and methodologies used in the dewatering analysis included in this comment letter, and how the analysis overestimates the nature and extent of the estimated groundwater drawdown.

Comment No. 26-E.3-4

As an example, Figures 1A&B show the estimated drawdown limits based on a preliminary review of the geologic conditions below the Project site and anticipated excavation depths for construction of a parking garage with 3-levels below grade in the southeast portion of the Project site. The distance-drawdown relationships are an approximation of the Theis equation and are considered reasonable for unconfined aquifers when an appropriately large storage coefficient is used.

Response to Comment No. 26-E.3-4

As described in the Dewatering Report (Appendix FEIR-13 of this Final EIR), the Project includes a 21-month temporary dewatering period. The equation referenced in the comment describes a theoretical, ultimate distance drawdown and does not consider infiltration control measures or a time-dependent transient period, which would apply to the temporary dewatering program. While the “appropriately large storage coefficient” value is not reported by the commenter in its analysis, it does not appear to reflect the actual geology of the Project Site, which consists of predominantly fine-grained clays, silts, sandy silts, clayey sands, silty sands with limited sands without fine-grained matrix mixtures. As such, and as described in Appendix FEIR-13 of this Final EIR, the storage coefficient in an unconfined aquifer corresponds to the specific yield (Sy).¹¹⁵ The specific yield (or ratio of pore water to soil volume that can be drained by gravity in an unconfined aquifer) for the predominantly clay- and silt-bearing soils can be low (the Dewatering Report estimates an overall Sy of 10 percent for the bulk water bearing materials). See Section 3.3 of the Dewatering Report for a discussion of the specific yield analysis and rationale. Thus, the inappropriate assumptions and methodology used in the commenters’ analysis combine to overestimate the nature and extent of the estimated temporary groundwater drawdown conditions. Refer to Response to Comment No. 26-69 with regard to this topic.

¹¹⁵ Todd, D. and Mays, L., Groundwater Hydrology, 2005.

Comment No. 26-E.3-5

For the analysis, we have assumed an aquifer thickness of 70 feet, which corresponds to the deepest borings reported to have been completed for the DEIR. Larger than predicted drawdowns can be expected if the saturated thickness is appreciably smaller than has been assumed, or if dewatering were to occur at multiple sites at the same time. The assumed hydraulic conductivity (K) range of 1 foot/day to 10 feet/day generally encompasses the expected values for silty-sand underlying the Project site.

Response to Comment No. 26-E.3-5

As described in the Dewatering Report included in Appendix FEIR-13 of this Final EIR, cone penetrometer (CPT) and hydraulic profiling tool (HPT) results found approximately 85 percent of Project Site soils tested showed hydraulic conductivity (K) values of 0.1 feet/day or less. The data demonstrates that the bulk K values for the Project Site are much less than the K values of 1 and 10 feet/day used in the commenter's analysis. The K value of 10 feet/day used in the commenter's analysis is more representative of a sand, and their assumption of 1 to 10 feet/day is 10 to 100 times greater than the results of the Project Site-specific analysis in the Dewatering Report. Accordingly, the distance-drawdown estimates in Figures 1A and 1B of this comment letter overstate the nature and extent of the estimated drawdown.

Comment No. 26-E.3-6

The distances are representative of isolated construction. The drawdown depressions and limits would be greater for additional excavations proceeding concurrently, which may be necessary to develop the Project per the conceptual site plan.

Response to Comment No. 26-E.3-6

Concurrent excavation dewatering of the excavation areas shown in Figure 3 of the Soil Management Plan (included in Appendix G.1 of the Draft EIR) is anticipated to occur. As described in Appendix FEIR-13 of this Final EIR, the Dewatering Report provides a conservative distance-drawdown analysis for the largest of the deep excavations on the north property boundary (Area 2). Given the variable depth and location of the excavations, drawdown limits would not be greater than that stated in the Dewatering Report. For example, because of the shallow depths (7.5 to 11 feet bgs), excavation Areas 4A, 4B, and 5 are expected to require limited dewatering and create limited groundwater drawdown. Also, excavation Area 6, which is located in the southeast portion of the Project Site, is expected to have limited hydraulic influence (i.e., overlapping drawdown) with the other excavations. Table 1 in the Dewatering Report lists the estimated groundwater dewatering volumes for each proposed excavation area, based on the conservative

assumption that each excavation area would be dewatered on its own. If excavation areas are dewatered simultaneously, the estimated dewatering quantities in Table 1 of the Dewatering Report would likely be reduced due to the merging and overlap of excavation cones of depression. Further, as stated in Appendix D of the Dewatering Report, since the Area 2 excavation represents the largest by volume of the deeper excavations of the Project, approximately the same groundwater cone of depression could be anticipated to extend radially from the edges of the overall excavation if all excavation areas are dewatered simultaneously.

Comment No. 26-E.3-7

Lowering of the groundwater table could result in ground settlement. Dewatering of the excavations could have a significant impact on adjacent properties, which could include building distress on unreinforced structures with shallow foundations. Drawdown of the groundwater table proposed for the excavations could induce settlement at the adjacent properties.

Response to Comment No. 26-E.3-7

The Dewatering Report included in Appendix FEIR-13 of this Final EIR uses a numerical groundwater model to evaluate the depth and extent of groundwater drawdown during temporary construction dewatering. The estimated temporary cone of depression for 8 months and 21 months is provided in Figures 8A and 8B of the Dewatering Report. The temporary cone of depression estimates in the Dewatering Report were compared to historical groundwater level fluctuations recorded at the Project Site. Based on a comparison of these data and analyses, the report confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction, including settlement and subsidence effects, would be less than significant. Refer to the Subsidence Technical Memorandum prepared by Geotechnologies included as Appendix D of the Dewatering Report.

Comment No. 26-E.3-8

The DEIR should include a comprehensive discussion of ground settlement potential due to dewatering and evaluation of proposed cut-off wall design. In the absence of such information, it is impossible to accurately gauge the risk of construction dewatering. We recommend development of mitigation measures to address the potential for offsite lowering of the groundwater table, and monitoring and reporting of groundwater levels during construction.

Response to Comment No. 26-E.3-8

Refer to Response to Comment Nos. 3-7, 11-5, and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts, and Response to Comment Nos.

11-25, 16-74, and 16-85 for further discussion of settlement and subsidence. Also refer to Response to Comment No. 26-E.3-7. As discussed therein, the Dewatering Report confirms the Draft EIR's conclusions that impacts related to dewatering and settlement would be less than significant. Thus, no mitigation or other measures is required.

Comment No. 26-E.3-9

Mitigation plans should be developed if ground movement at the perimeter of the Project exceed established thresholds.

Response to Comment No. 26-E.3-9

Refer to Response to Comment No. 26-E.3-2 with regard to surveying and monitoring of the shoring system and ground movement.

Comment No. 26-E.3-10

- **Mobilization of Contaminant Plumes**—Dewatering is likely to induce offsite expansion of potential contaminant plumes nearby or adjacent to the site.

Groundwater contamination has been reported at the Project site and vicinity (GeoTracker, 2022). Dewatering at the Project site has the potential for existing contaminant plumes to be enlarged and possibly brought under adjacent properties, which could include the Broadcast Center Apartments, Farmers Market and The Grove. Existing plumes would extend towards the areas of pumping for dewatering of excavations. Discussion of existing groundwater contamination and plume migration due to dewatering is not addressed in the DEIR. The DEIR should analyze the potential impacts of dewatering on plume migration.

Response to Comment No. 26-E.3-10

In response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant. Refer to Response to Comment Nos. 26-88 through 26-93 and 26-113 regarding groundwater contaminant movement. While there have been a number of groundwater cleanup projects in the area, at this time the appropriate regulatory agencies have reviewed and approved either no-further-action or completion of remediation activities

for these sites.¹¹⁶ No Further Action indicates the appropriate regulatory agency has deemed the cleanup to be acceptable within regulatory standards. Thus, while there can be low-level concentrations of residual chemicals dissolved and detected in groundwater, there are no known off-site contaminant plumes near or upgradient of the Project Site (within approximately 1,300 feet of the Project Site) as incorrectly asserted in the comment, and therefore no such plume would be mobilized by temporary dewatering during construction.

Comment No. 26-E.3-11

- **Oil Production**—From our experience in the Project vicinity, there is potential for past oil production to impact the Project site. There is no mention of the previous oil production activity adjacent to, and potentially on site in the geotechnical report (Geotechnologies, 2022). There is no discussion of tar in the geotechnical report text, but tar is noted in at least one boring, and dark gray to black soil descriptions in the boring logs suggest naturally occurring petroleum is present at other borings.

There is the potential to encounter buried and unplugged or poorly abandoned wells or petroleum saturated soils during Project construction. The potential for damage from petroleum saturated soils on the Project site, including obnoxious odors, dust, and staining transported by wind or water to adjacent properties during construction, should be evaluated in the DEIR.

Response to Comment No. 26-E.3-11

Refer to Response to Comment No. 13-4 regarding oil and testing and disposal requirements for any contamination encountered.

Refer to Response to Comment No. 26-38 regarding odor monitoring. As discussed therein, any residual concentrations would be appropriately managed during all soil disturbance activities through implementation of the protocols described in the Soil Management Plan (included in Appendix G.1 of the Draft EIR) set forth in Mitigation Measure HAZ-MM-1. Required protocols would address soil sampling and analysis, stockpiling of affected soils, soil re-use, decontamination, and dust control.

Comment No. 26-E.3-12

- **Liquefaction Potential**—We noted discrepancies in the data analyzed for the liquefaction potential, including field and laboratory data not matching the

¹¹⁶ California State Water Quality Control Board, GeoTracker, <https://geotracker.waterboards.ca.gov>, accessed February 2023.

information included in the analyses tables provided in the DEIR Sections. Therefore, there is a potential for liquefaction and related distress at the Project site.

The potential for liquefaction at the Project site could impact the Project site and adjacent properties. If liquefaction does exist and is not mitigated during Project design and construction, resulting distress to the Project from liquefaction-induced ground movement could include, for example, damage to underground utilities. Our review of the data indicates up to four inches of potential ground settlement. The Project geotechnical engineer should review their data to confirm the potential for liquefaction. The DEIR should be revised to correct the discrepancies noted and recirculated.

Response to Comment No. 26-E.3-12

Minor typographic errors and discrepancies in some of the data presented in the boring logs and the liquefaction analyses were discovered by the commenter as discussed in Comment No. 26-E.3-15. Since the borings for the Draft EIR were performed in 2019, the soil samples have already been disposed of, which is standard practice, and are therefore no longer available for additional laboratory testing.

In response to this comment, two additional borings were drilled at the Project Site to confirm the geotechnical analysis and conclusions in the Draft EIR. Refer to Appendix FEIR-19. The additional borings were excavated on November 3, 2022, and November 4, 2022. The two additional geotechnical borings, identified as B20 and B21, were drilled adjacent to B12 and B14, respectively.

The boring locations are shown in the boring location graphic included as Appendix FEIR-19. Consistent with the Draft EIR liquefaction analysis, which is discussed on pages 9 to 11 of the Preliminary Geotechnical Engineering Investigation, included as Appendix E.1 of the Draft EIR, the supplemental and confirmatory liquefaction analyses were performed for the two additional borings following the California Geologic Survey Special Publication 117A.¹¹⁷ Based on the additional explorations and analyses, the potential for liquefaction at the Project Site remains low, and the geotechnical recommendations and conclusions provided in Appendix E.1 of the Draft EIR remain applicable for the Project. Thus, the Draft EIR correctly concluded that impacts associated with liquefaction would be less than significant.

¹¹⁷ California Geological Survey (CGS), 2008, Special Publication 117A Guidelines for Evaluating and Mitigating Seismic Hazards in California.

Comment No. 26-E.3-13

- **Expansive Soil Potential**—Mitigation of the expansive soil potential is poorly explained.

The potential for damage from expansive soils at the Project site should be better defined so that any mitigation measures do not affect the adjacent properties.

Response to Comment No. 26-E.3-13

The Draft EIR comprehensively analyzed potential geologic and soils hazards in Section IV.D, Geology and Soils, of the Draft EIR, including the potential for the Project to cause or exacerbate direct or indirect impacts associated with existing environmental conditions, including fault rupture, ground shaking, soil liquefaction, soil expansion, and/or landslide. Impacts regarding these topics are based on the Preliminary Geotechnical Engineering Investigation, Addendum I—Response to Soils Report Review Letter (Geotechnical Addendum I), and Addendum II—Additional Geotechnical Comments (Geotechnical Addendum II), all prepared by Geotechnologies, Inc. and provided in Appendix E of the Draft EIR. The Preliminary Geotechnical Engineering Investigation and Geotechnical Addendum I were reviewed and approved by LADBS in May and August 2021.

As analyzed on pages IV.D-19 to IV.D-28 in Section IV.D, Geology and Soils, of the Draft EIR, in accordance with CEQA Guidelines Appendix G, the Project would not directly or indirectly cause potential substantial adverse effects including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides; result in substantial soil erosion or the loss of topsoil; be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater; or directly or indirectly destroy a unique geologic feature. Therefore, impacts related to geology and soils would be less than significant, and no mitigation is required.

See page 17 of the Preliminary Geotechnical Engineering Investigation (Appendix E.1 of the Draft EIR), which describes the approach for addressing expansive soils. The soils underlying the Project Site consists of stratified layers of silty and clayey sands, sands, sandy silts, sandy clays and silty clays. The Expansion Index for the surficial soils in the upper 5 feet are in the range of 35 to 130, corresponding to low to very high expansion range. The recommended grading for the proposed at-grade building pads will blend the onsite fill soils. Additional testing will be performed during the grading process to

determine the expansion potential of the fill pad below the at-grade structures. At a minimum, LADBS Information Bulletin P/BC 2017-116 (Foundation Design for Expansive Soils) will be implemented into the final building design to address potential expansive soils, as necessary. The proposed subterranean structures will be designed to address the effects of expansive soils and hydrostatic pressure. All structural plans will be submitted for review and approval by the local jurisdiction prior to construction. Expansive soil conditions will be considered and evaluated when determining the appropriate shoring and dewatering methods. Preservation of the neighboring properties, in addition to other design factors, will be considered in the decision and design process. Final shoring plans for individual buildings will be submitted to the City for review and approval prior to construction. Compliance with applicable regulatory requirements will be ensured by the plan check review process.

Comment No. 26-E.3-14

- **Groundwater Characteristics**—There is insufficient information to support the hydrology and groundwater quality determinations of non-significant impact. For example, information on direction and rate of groundwater movement is lacking.

As noted above, there could be significant groundwater-related impacts to surrounding properties during construction of the Project. In addition, if post-construction dewatering is required, there could be significant impacts during Project operation.

Response to Comment No. 26-E.3-14

Refer to Response to Comment No. 11-5 regarding groundwater quality. Refer to the Hydrology and Water Quality Report included as Appendix H of the Draft EIR for a detailed discussion of the hydrology of the Project Site. As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment No. 11-25 regarding the Draft EIR's analysis of impacts related to dewatering.

Comment No. 26-E.3-15

- **Stormwater Detention**—Our review indicates that implementation of Low Impact Development (LID) stormwater standards may require the detention of up to 636,000 gallons on Project site, which could require additional excavation or above ground water storage structures (e.g. tanks) beyond that required for Project buildings.

Stormwater detention could require additional excavation that would likely require dewatering and associated impacts with groundwater drawdown. Evaluation of

this potential impact should consider all planned subsurface structures, including those needed for stormwater detention.

Response to Comment No. 26-E.3-15

As discussed in Response to Comment Nos. 3-4, 3-7, and 11-5, the Project would include the installation of a capture and reuse system to be used for irrigation purposes, consistent with the LID Ordinance. As stated in Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project will capture and reuse up to approximately 625,000 gallons of water; refer to Response to Comment No. 26-E.1-6.

Furthermore, excavation for the capture and reuse retention tanks is accounted for in the overall excavation volumes. Excavation means and methods for Project Site stormwater retention will be similar to those used in other parts of the Project consisting of either laid back earth berms, located within the cut-off wall system, or soldier piles with lagging. Similarly, dewatering needs during the excavation for storage tanks will be included in the dewatering plan for individual buildings. The development of these systems will take into account the precise geology of the specific locations. Therefore, construction methods for subsurface elements have been addressed.

Comment No. 26-E.3-16

- **Cumulative Impacts**—To determine potential significance of Cumulative Impacts, the L.A. CEQA Thresholds Guide calls for identification of “the related projects that could affect the same surface water body or flood plain as the proposed project” and “those located over the same groundwater basin” and analysis of the combined effect of the Project and the others so identified. Although there is a list and map of related projects on pages III-9 to III-15 of DEIR section III (Environmental Setting), there are no descriptions in DEIR section IV.G (Hydrology and Water Quality) of the subset of those projects that might affect the same surface water bodies or groundwater basins and how they might do so, nor of the potential cumulative impact of the Project with those other specific projects. Further it is unclear if the list of related projects includes all projects that could impact the same groundwater basin and the DEIR does not consider other related projects through 2043 buildout that could impact the same basin.

Cumulative impacts to hydrology and water quality are not fully analyzed.

Response to Comment No. 26-E.3-16

As discussed in Sections 6.2.1 and 5.2.2 of the Hydrology and Water Quality Report, included as Appendix H of the Draft EIR, the Project, as well as related projects, will be required to comply with both the City of Los Angeles LID Ordinance for stormwater quality

and the Los Angeles County Hydrology Manual for management of stormwater volume/discharge. All projects required to comply with the City of Los Angeles LID Ordinance are required to implement post construction BMPs that will reduce total suspended solids and pollutants leaving the Project Site. Collectively, these BMPs would improve water quality when compared with existing conditions. As discussed in Section 6.2.1 of the Hydrology and Water Quality Report, the Project Site is currently approximately 90 percent impervious, and is expected to remain approximately 90 percent impervious post-construction. Therefore, the Project will not increase the peak flow rate discharge from the Project Site, and cumulative impacts associated with the Project and related projects will be less than significant.

Refer to Response to Comment No. 26-112 for a discussion of the potential impacts to groundwater and the LA CEQA Threshold Guide.

Refer to Response to Comment No. 26-159 regarding the related projects that were analyzed in the Draft EIR.

Comment No. 26-E.3-17

- **Surface Water**—Additional information is needed to support the hydrology and quality determination of non-significant impact.

Response to Comment No. 26-E.3-17

Refer to Response to Comment Nos. 11-5, 13-8, and 26-111.

Comment No. 26-E.3-18

The above comments should be used as general guidance with respect to conflicts relative to the potential impacts of the proposed construction and development of the Project. Based on the lack of specific design specifications in the DEIR Sections, additional concerns could be raised as the Project design advances.

We appreciate the opportunity to be of continued service to you on this project. Please call if you should have any questions or if we can be of further assistance.

Response to Comment No. 26-E.3-18

The issues raised by the commenter are addressed in Response to Comment Nos. 26-E.3-2 through 26-E.3-17. As demonstrated therein, the analysis in the Draft EIR meets the requirements of CEQA.

Comment No. 26-E.3-19**REFERENCES**

Geotracker, 2022, [GeoTracker \(ca.gov\)](https://www.ca.gov)

Eyestone Environmental, LLC, 2021, Initial Study TVC 2050 Project, Case Number: ENV-2021-4091-EIR, prepared for the City of Los Angeles Department of City Planning, Applicant: Television City Studios, LLC, report dated July 2021.

Geotechnologies, Inc. 2021, Preliminary Geotechnical Engineering Investigation, Television City 2050 Specific Plan, 7800 West Beverly Boulevard, Los Angeles, California (Including 7716–7860 West Beverly Boulevard, Los Angeles, California); File Number 21699, dated March 29, 2021, revised April 22, 2021.

KPFF Consulting Engineers, 2021 TVC 2050 Project (7800 Beverly Boulevard, Los Angeles, CA 90035) Hydrology and Water Quality Report, dated October 2021.

Figure 1A—Predicted Dewatering Drawdown 36 Ft Excavation Southeast Building Site— $K=1$ ft/day

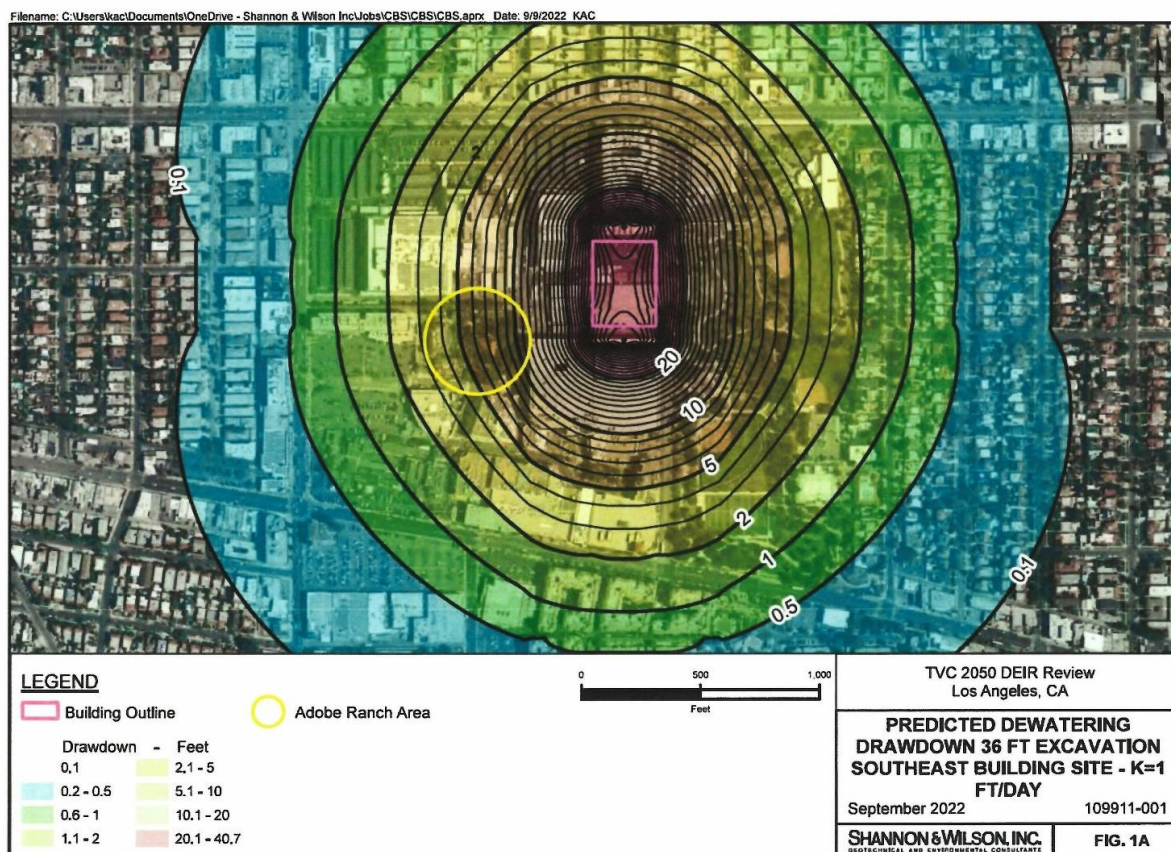
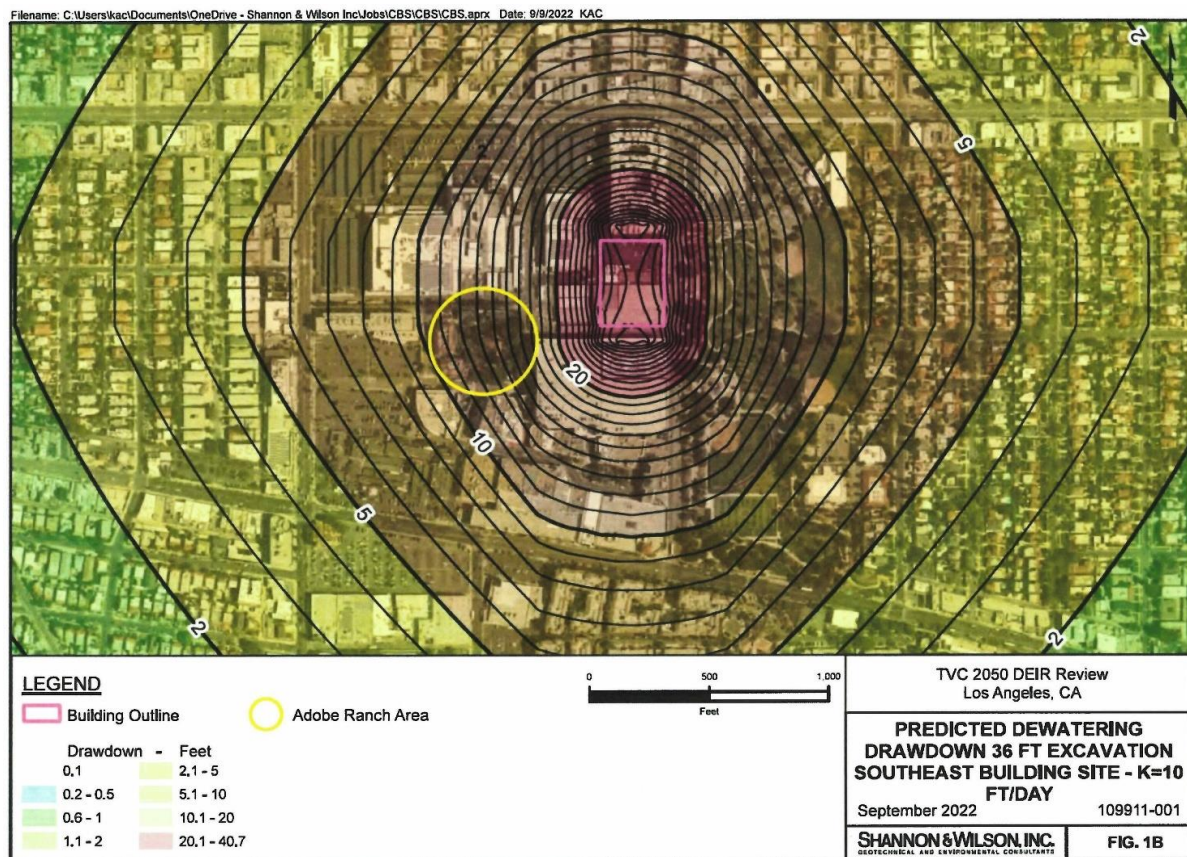


Figure 1B—Predicted Dewatering Drawdown 36 Ft Excavation Southeast Building Site— $K=10$ ft/day



Response to Comment No. 26-E.3-19

This comment consisting of a list of references and figures is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-E.3-20

Exhibit 1a—CBS Television City DEIR Review of Geology and Soils Discipline Report

Section IV.D—Geology and Soils			
Page #	Section	Text	Comment
IV.D-11	2.b (3) b	“...groundwater level in all of the boreholes rose to depths between eight and 15.5 feet bgs, indicating an artesian groundwater condition...”	How was groundwater measured? How long were the boreholes left open between drilling and backfill? At what depth is the “relatively impermeable clay layers”? Were wells and/or vibrating wire piezometers installed in any of the

			borings? Given the proposed dewatering for the excavations, additional data should be collected to better define the groundwater pressures in the different aquifers and the depth/continuity of the aquitards.
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Response to Comment No. 26-E.3-20

Refer to pages 3 to 12 of Draft EIR Appendix E.1, Preliminary Geotechnical Engineering Investigation and the site plan and boring logs attached thereto, beginning on PDF page 71, for details on the geotechnical investigation. Refer also to page 8 of the Site Summary Report, included in Appendix G.1 of the Draft EIR, for a discussion of the historical investigations of the Project Site, including an evaluation of depth to groundwater. The desktop study referenced therein was based on historical groundwater potentiometric maps from groundwater monitoring reports for the former Texaco station that was located within the Project Site boundary, which are available in the State of California Geotracker database. Additional information on the Project Site subsurface hydrogeology and groundwater conditions is provided in the Dewatering Report (Appendix FEIR-13 of this Final EIR). Also refer to Response to Comment No. 26-69 with regard to this topic. Additional groundwater studies are expected to be performed during the City's regulatory permitting process (see LABC Sections 1803.5.4 and 1805.1.3).

Comment No. 26-E.3-21

IV.D-12	2.b (3)c	Liquefaction analyses were performed at five-foot intervals within 12 of the 19 exploratory borings conducted on-site.	In our review of the liquefaction analyses provided in Appendix E, we noted discrepancies in the data analyzed for the liquefaction hazard. Specifically, laboratory data did not match what was inputted on the spreadsheet table. Based on review of the data provided in the logs and laboratory testing of Borings 12 and 14, our analyses indicate liquefaction occurring in both borings, resulting in up to four inches of potential ground settlement.
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Response to Comment No. 26-E.3-21

Refer to Response to Comment No. 26-E.3-12.

Comment No. 26-E.3-22

IV.D-14	2.b(3)d	Subsidence and ground failure, “No large-scale extraction of groundwater, gas, oil, or geothermal energy currently occurs or is planned at the project site.” “Based on the age of the older surficial sediments that underlie the Project site, subsidence is not anticipated on-site.	The site is at the western boundary of a previously active oil field. Is there evidence of continued subsidence from past extraction? Dewatering is proposed for the project during construction. Drawdown of the groundwater table proposed for the excavation could induce settlement on adjacent properties
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Response to Comment No. 26-E.3-22

As stated in the Geotechnical Addendum II, included in Appendix E.5 of the Draft EIR, the Project Site is not located within an area of known subsidence due to withdrawal of oil or any other fluid. According to the Geologic Map of the Hollywood and Burbank (South ½) Quadrangles, Los Angeles, California (Dibblee, Map DF-30), the Project Site is underlain by Older Surficial Sediments. Due to the age of the sediments, subsidence is not anticipated for the Project Site soils. Refer to Response to Comment Nos. 3-7, 11-5, 11-25, 16-74, and 16-85 with regard to the temporary construction dewatering and potential for subsidence. The Dewatering Report, included as Appendix FEIR-13 of this Final EIR, confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction, including settlement and subsidence effects, would be less than significant.

Comment No. 26-E.3-23

IV.D-14	2.b(3)d	Expansive soils	
IV.D-24	3.d. Threshold (c).(1)	“Although dewatering operations are expected during construction, such activities would be limited and temporary and would not involve large-scale water extraction”	What is considered large-scale? Will dewatering reduce groundwater table on adjacent properties?

Response to Comment No. 26-E.3-23

Refer to Response to Comment Nos. 11-5, 11-25, and 26-61 for a summary of the drawdown and radius of influence estimates resulting from temporary dewatering during construction of the Project. The Dewatering Report included in Appendix FEIR-13 of this Final EIR provides estimates of pumping rates, water-level drawdown, and cone of depression radius of influence for the estimated 21-month temporary dewatering period. See Figures 8A and 8B of the Dewatering Report for the estimated temporary cones of depression and Table 1 of the Dewatering Report for estimated groundwater dewatering

quantities. As discussed in the Dewatering Report, approximately 40,600 gpd would be dewatered during the 21-month dewatering period. In comparison, the maximum projected operational water demand for the Project is approximately 269,123 gpd (see Table IV.M.1-6 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR).

Comment No. 26-E.3-24

IV.D-24	3.d. Threshold (c).(1)	"...localized fill was encountered at a depth of 20 feet...[with] highly saturated and soft soils"	Clarify if the soils will remain in place or excavated. If the latter, will unacceptable soil be exported offsite?
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Response to Comment No. 26-E.3-24

Soil or fill excavated as a result of the construction will be exported. Refer to Response to Comment No. 13-4 in regard to off-site disposal of potentially impacted soils.

Comment No. 26-E.3-25

General	Oil Wells and Natural Gas	The City of LA CEQA Threshold Guidelines requires review of active or planned oil or natural gas extraction.	The project site is located at the boundary of a previously active oil field Proximity to oil wells (active or abandoned) and other potential impacts to the site and surrounding properties are not addressed in the geologic section of the DEIR.
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Response to Comment No. 26-E.3-25

Refer to Response to Comment Nos. 13-4 and 13-6 for a discussion of the investigation of and potential impacts from naturally occurring oil, petroleum or tar at the Project Site.

Comment No. 26-E.3-26

Page 9 of 4/22/2021 Report	Liquefaction Analyses	"...groundwater level for the Project site is approximately 8 feet below the ground surface..."	Artesian groundwater conditions are indicated in the reports, suggesting a higher groundwater table (at or near the ground surface). However the artesian aquifer depth is not identified.
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Response to Comment No. 26-E.3-26

Refer to Response to Comment No. 26-E.3-20 regarding groundwater levels. Artesian groundwater conditions or aquifers (also known as confined or pressure aquifers)

refers to when groundwater is confined under pressure greater than atmospheric by overlying relatively impermeable strata. In a well penetrating such an aquifer, the water level will rise above the level of the confining bed (from Groundwater Hydrology, Todd and Mays, 2005). Overall, the shallow aquifers in the Hollywood Subbasin, including the semi-perched zone found at the Project Site, are reported to exhibit unconfined conditions (not confined or artesian conditions) with an average depth to groundwater ranging from approximately 8 to 10 feet bgs.¹¹⁸ During borehole drilling, some borings may have encountered limited, temporary semi-confined conditions or very slow groundwater recharge, that appeared to suggest limited artesian rising water levels. Based on the extensive groundwater monitoring and subsurface investigations performed to date to approximately 80 feet bgs, overall unconfined conditions are not expected to cause a higher water table than is currently projected.

Comment No. 26-E.3-27

Page 18 of 4/22/2021 Report	Methane Zones	The project is located in a methane zone.	The project is located in the Salt Lake oil field, and will likely encounter methane and hydrogen sulfide gas. Mitigation measures in accordance with the City of LA should be implemented to protect the project and surrounding properties as discussed in the report.
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Response to Comment No. 26-E.3-27

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Project's location within a methane zone and methane mitigation.

Comment No. 26-E.3-28

Page 37 of 4/22/2021 Report	Temporary Dewatering	"it is recommended that a qualified dewatering consultant should be retained during the design phase of the project."	Preliminary calculations indicate that the cone of depression created by dewatering the proposed excavations could create a large cone of depression that would extend hundreds of feet beyond the excavation(s) and onto adjacent properties.
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¹¹⁸ DWR, California's Groundwater Bulletin 118, Coast Plain of Los Angeles Groundwater Basin, Hollywood Subbasin, 4-11.02, 2004

Response to Comment No. 26-E.3-28

Refer to Response to Comments Nos. 11-25, 26-64, and 26-69 regarding the dewatering system and the cone of depression estimates.

Following completion of construction, dewatering will cease, and groundwater conditions are expected to recover to general pre-construction conditions, although seasonal groundwater fluctuations will continue to occur.

Comment No. 26-E.3-29

Boring Log Number 7—Plate A-7c of 4/22/2021 Report	Tar is in the Description	Tar is encountered below 60 feet.	There is no discussion of tar in the report text, but tar is noted in at least one boring. The reports should address risks of tar being encountered to the project.
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Response to Comment No. 26-E.3-29

Refer to Response to Comment Nos. 13-4, 16-64, and 26-80 regarding the limited extent of tar being detected in subsurface soils to date and the management of any tar discovered during construction.

Comment No. 26-E.3-30

Exhibit 1b—CBS Television City DEIR Review of Hydrology & Water Quality Discipline Report

Section IV.G—Hydrology & Water Quality			
Page #	Section	Text	Comment
IV.G-1–IV.G-18	2.a	Regulatory framework	Regulations are well-described, but lack clear explicit statement of applicability to Project, or lack thereof. This could be remedied in most instances by a simple statement of the way that the regulation constrains the project or the DEIR

Response to Comment No. 26-E.3-30

All of the regulations described in Subsection 2.a of Section IV.G, Hydrology and Water Quality, of the Draft EIR are applicable to the Project, and the descriptions are consistent with City policy and CEQA.

Comment No. 26-E.3-31

IV.G-20	2.b.2.a	The average wet weather flow is at least 10 times higher during large storms	“average” wet weather flow and flow “during high storms are not likely to be the same thing, unless average wet weather is constant large storms. Delete word “average”. [sic]
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Response to Comment No. 26-E.3-31

The language on page IV.G-20 of the Draft EIR is from page 21 of the Hydrology and Water Quality Report, included as Appendix H of the Draft EIR. Appendix H includes Footnote No. 13 citing the source of the information as the City of Los Angeles Stormwater Program’s website on the Ballona Creek Watershed.

Comment No. 26-E.3-32

IV.G-21	Figure IV.G-1		<p>Potential runoff locations are all at south edge of property, which makes sense. But it means that any excavation that might be required to accommodate, for instance, the Oldcastle STORMCAPTURE or cistern (see Hydrology Report section 522 comments), will be right at the south boundary, with corresponding potential to affect off-site groundwater levels, at least during construction.</p> <p>Also, given lack of catch-basin and conveyance from southwest corner of Drainage Area A-2. where will captured water go from there?</p>
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Response to Comment No. 26-E.3-32

Refer to Response to Comment Nos. 3-4, 3-7, and 26-111 regarding hydrology and water quality.

It is expected that the depth to groundwater ranges from approximately 8 and 10 feet bgs, and the depth of the cistern will range between approximately 8 and 12 feet bgs. It is estimated that the potential feature will have limited intrusion into groundwater, if any. Overall, it is estimated that the potential feature will have minimal effect on groundwater flow if it intercepts groundwater because it is not expected to extend more than 2 feet. Proper drainage infrastructure, including but not limited to catch basins, pipes, etc., will be used to capture and convey the storm water from the drainage areas to the LID treatment system with an ultimate discharge to the City of Los Angeles storm drain system.

Comment No. 26-E.3-33

IV.G-24	2.b.4.c	There are no groundwater production wells or public water supply wells within the Project Site or in the surrounding vicinity.	Define “vicinity”
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Response to Comment No. 26-E.3-33

As stated on page IV.G-32 in Section IV.G, Hydrology and Water Quality, of the Draft EIR, “there are no existing groundwater production wells or public water supply wells within one mile of the Project Site.”

Comment No. 26-E.3-34

IV.G-28	3.c	No specific Project design features are proposed...	<p>Lack of specific design features makes it intrinsically difficult to assess significance of potential impacts.</p> <p>DEIR Section V. Alternatives has some differentiation with respect to Hydrology & Water Quality impacts; how were these determined if not by comparison of specific design features, and where is the rationale for the differences presented if not in this section?</p> <p>Also, DEIS [sic] Section II. Project Description describes some specific design features; do none of these have any possibility of affecting Hydrology & Water Quality, and are there no anticipated design features that might (such as location/depth of underground parking or cisterns)?</p>
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Response to Comment No. 26-E.3-34

All of the relevant information, including physical parameters and design of the Project, needed to evaluate potential impacts associated with hydrology and water quality is included in Section II, Project Description, Section IV.G, Hydrology and Water Quality, and Appendix H, Hydrology and Water Quality Report, of the Draft EIR. Refer to page IV.G-30 of the Draft EIR for an overview of the system that would be used on-site to manage drainage and runoff. The Draft EIR concluded that potential impacts related to hydrology and water quality would be less than significant without PDFs or mitigation measures. As described in detail in Section V, Alternatives, of the Draft EIR, the differing impacts associated with hydrology and water quality between the Project and the alternatives are based on the differing physical elements, including but not limited to the

amount of impervious surfaces, depth of grading, overall amount of development, and amount of grading and overall construction activities. As stated on page V-14 of the Draft EIR, the alternatives analysis assumed that the alternatives would implement the same PDFs and mitigation measures as the Project.

Comment No. 26-E.3-35

4	2	"plans, policies, and programs... include"	Is this an exhaustive list? If it is, say so. As written, it leaves reader unclear if there may be any other relevant plans, programs, or policies.
5–20	2.1–202	Description of plans/policies/programs	All subsections lack clear explicit statement of applicability to Project, or lack thereof.

Response to Comment No. 26-E.3-35

The pages of the Hydrology and Water Quality Report (Appendix H of the Draft EIR) referenced in this comment include the applicable regulatory plans, policies, and programs related to the CEQA analysis of hydrology and water quality impacts. This description is consistent with City policy and CEQA.

Comment No. 26-E.3-36

20	3.1.1	Watershed description	Should include a map showing Project site watershed and sub-watershed w/landcover, precipitation, streams, and drains. (Figure 1 is inadequate to orient reader)
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Response to Comment No. 26-E.3-36

Section 3.1.1 of the Hydrology and Water Quality Report describes the regional surface water hydrology, and Figure 1 therein shows the Project location in the designated, regional (Los Angeles County) Ballona Creek watershed map.

Comment No. 26-E.3-37

20–21	3.1.1	Average dry weather flow is 25 cfs Average wet weather flow is 10x, (-250 cfs), even more during large storms Ballona Ck 50-yr design discharge 71,400 cfs	Is 250 cfs a winter base flow? How big are typical large storms? What is the frequency/duration of wet weather? Are peak flows flashy or sustained?
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			It is difficult to get a sense of the surface water regime from this section.
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Response to Comment No. 26-E.3-37

Section 3.1.1 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR) describes in detail the existing Ballona Creek watershed flow conditions, as published by the City of Los Angeles Storm Water Program. See footnotes 13 and 14 in Appendix H, Hydrology and Water Quality Report, of the Draft EIR for publicly available information on the Ballona watershed and stormwater. This information pertains to the Ballona Creek watershed, not the Project.

Comment No. 26-E.3-38

21	3.1.2	Project Site slope, aspect, and drainage system description	This is project site description, which would fit better in section 3.1.3; what is local hydrology like? Anything drain into the site?
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Response to Comment No. 26-E.3-38

Section 3.1.2 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR) describes the conditions local to the Project Site and the surrounding streets. Section 3.1.3 therein describes the tributary areas on the Project Site.

Comment No. 26-E.3-39

22	3.1.3 Table 1	Existing drainage runoff calculations	How were these numbers generated? Assuming it is explained elsewhere. provide section reference. What total volumes are generated during this storm?
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Response to Comment No. 26-E.3-39

The calculations were completed using the Los Angeles County Department of Public Works Hydrology manual. Calculations are included in Figure 4 of the Hydrology and Water Quality Report, Appendix H, of the Draft EIR. Refer to Response to Comment No. 16-74 regarding drainage and stormwater runoff.

Comment No. 26-E.3-40

22	3.2.2	In general urban stormwater runoff occurs following precipitation events, with volume... depending on the intensity and duration...	The section statement shows why some information on storm timing and intensity would be appropriate in section 3 1
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Response to Comment No. 26-E.3-40

Refer to pages IV.G-34 through IV.G-37 of Section IV.G, Hydrology and Water Quality, of the Draft EIR for the evaluation of the change in surface water runoff patterns and quantity of the Project Site due to the construction and operation of the Project, and the impact of these changes on the existing downstream stormwater system. As part of the surface water hydrologic analysis, stormwater runoff generated from the Project Site was quantified using the Modified Rational Method, which accounts for storm timing and intensity.

Comment No. 26-E.3-41

23	3.3	Groundwater Hydrology	Section 12 states this is about GWL; use same term(level or hydrology) in both locations; this section has more than just GW "level", [sic] but less than is needed for GW "hydrology". [sic]
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Response to Comment No. 26-E.3-41

Refer to Response to Comment Nos. 3-4, 3-7, and 16-85 for a detailed discussion of groundwater hydrology and groundwater resources.

Comment No. 26-E.3-42

23	3.3.2	Local	What direction(s) does GW flow locally? LA CEQA Thresholds Guide calls for identification of "direction of flow" along with other groundwater characteristics.
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Response to Comment No. 26-E.3-42

Refer to Response to Comment No. 26-E.1-65 regarding the information about groundwater flow and other characteristics that was included in the Draft EIR.

Comment No. 26-E.3-43

24	3.3.3	Project Site	Describes GW levels, but not (inferred) direction of flow. The latter could be important. We can assume that groundwater water is flowing from north to south, but there may be some gradient direction changes on site, which should be discussed if dewatering is going to occur.
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Response to Comment No. 26-E.3-43

Refer to Response to Comment No. 26-E.1-65 regarding the information about groundwater flow and other characteristics that was included in the Draft EIR.

Comment No. 26-E.3-44

24	3.4.1, 3.4.2	Regional and Local constituents of concern	What is the current state of groundwater quality? There is no data or discussion either on site quality or adjacent off-site quality in this section of the DEIR. Does a constituent of concern imply widespread presence, or just potential for contamination?
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Response to Comment No. 26-E.3-44

Refer to Response to Comment Nos. 13-4, 26-79, and 26-87 with regard to the investigation of the Project, including off-site groundwater quality. Refer to Response to Comment Nos. 16-28, 26-111, and 26-113 regarding the Draft EIR's analysis of impacts related to groundwater quality. A constituent of concern is generally defined as follows: constituent of concern means any substance defined as a hazardous substance, hazardous waste, hazardous material, pollutant or contaminant by any environmental law or regulation. It does not imply widespread presence. Also see pages IV.F-1 to IV.F-20, Regulatory Framework, of the Draft EIR regarding definitions of hazardous wastes (i.e., Safe Drinking Water and Toxic Enforcement Act (HSC Section 25249.5 et seq.)).

Comment No. 26-E.3-45

24	3.4.3	Pervious parking 10% of site	Minimal contribution to groundwater recharge (due to small area) does not necessarily mean minimal contribution to groundwater pollution. That would depend on concentration of pollutants and their ability to get through
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			permeable pavement and down 10 or so feet to groundwater. Insubstantial contribution argument needs more support.
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Response to Comment No. 26-E.3-45

The pavement at the Project would not be permeable as the underlying soils are not suitable for infiltration per the Preliminary Geotechnical Engineering Investigation (Appendix E.1 of the Draft EIR). Refer to Response to Comment Nos. 3-4, 3-7, and 11-5 for a discussion of the installation of a capture and reuse system to be used for irrigation purposes, consistent with the LID Ordinance. As discussed in Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the stormwater management system will be designed in accordance with the LID Ordinance. Since the Preliminary Geotechnical Engineering Investigation has ruled infiltration infeasible to comply with the LID Ordinance, stormwater percolation will be limited to incidental rain falling directly on landscaped areas. Therefore, potential impacts to groundwater quality would be minimal and less than significant as stated in the Draft EIR.

Refer also to Response to Comment No. 26-E.3-44.

Comment No. 26-E.3-46

26	4.3	Adversely change the rate or direction of flow of groundwater	To evaluate this we need to know what the rate and direction of groundwater flow are under existing and proposed conditions.
27	4.3	Affect the rate or contaminants & following text	These duplicate bullet points from 4.4, where they belong.
27	4.4	Affect the rate or change the direction of movement of existing contaminants	Again, to evaluate this we need to know direction and rate of groundwater movement under existing and proposed conditions.

Response to Comment No. 26-E.3-46

Refer to Response to Comment No. 26-E.3-42. The Project's impact on groundwater flows is discussed on pages IV.G-33 to IV.G-34 in Section IV.G, Hydrology and Water Quality, of the Draft EIR.

Comment No. 26-E.3-47

27-28	5.1	LACDPW Hydrology Manual requires facilities to handle 25-yr storm.	HydroCalc output in Figure 4 is for 50-yr pre- and post- (no difference), and 85th
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		LA CEQA Thresholds Guide establishes 50-yr design storm for development impact analysis	<p>%-ile storm post—(with LID)</p> <p>Need to list and justify (source reference) input parameters here, not just show values in output table.</p> <p>Based on statement that post-Project conditions will be 90% impervious or greater, we re-ran HydroCalc for 100% impervious and got minimal difference (~0.1 cfs) from pre-Project 50-year peak flow rates, but more substantial changes to 85th %-ile flow rates and 24-hr runoff volume (+0.3 - 0.4 cfs, + 56,000 gallons 24-hr runoff volume respectively).</p>
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Response to Comment No. 26-E.3-47

The Draft EIR included a typographical error regarding the impermeability of the Project Site. The first sentence in Section 6.2.1 on page 33 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR has been revised to change increase to decrease as follows: “The Project is expected to decrease or maintain the overall percentage of impervious area from the current condition of the Project Site.” The Project Site is approximately 90 percent impervious under existing conditions and is expected to remain approximately 90 percent impervious post-construction. This correction is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Thus, the calculations in this comment are incorrect.

The Project Site area, slope, percentage impervious, and other factors required to evaluate the existing Project Site and proposed Project have been analyzed. The calculations have taken into consideration these known factors. These input parameters are found in Figure 4 of the Hydrology and Water Resources Report included as Appendix H of the Draft EIR.

Comment No. 26-E.3-48

28	5.2.1	Construction BMPs...	Implicit argument that SWPPP will result in no significant impact should be made explicit, perhaps by reference to SWPPP standards relating to surface water discharge/ contamination.
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Response to Comment No. 26-E.3-48

Refer to Sections 5 and 6 of the Hydrology and Water Quality Report (Appendix H of the Draft EIR) regarding methodology and the impact analysis, respectively. The Project will comply with the State of California Water Resources Control Board Construction

General Permit (Adopted Order 2009-0009-DWQ and amendments 2010-0014-DWQ and 2012-0006-DWQ) for stormwater discharge from construction sites. A SWPPP will be developed as the method for compliance and will result in a less-than-significant impact.

Comment No. 26-E.3-49

29	5.2.2	Project will need to capture an2d use up to 625,000 gallons	<p>How was the 625k figure calculated? From Figure 4 LID output we calc ~580k gallons, or 636k gallons if site goes to 100% impervious.</p> <p>How large of a storage facility would this require, and is that feasible? A 600,000 gallon tank is 61 ft in diameter and 28 feet tall; will that be excavated or above ground, where on the site would it be placed, or would multiple smaller storage structures be dispersed across the site, above or below ground?</p>
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Response to Comment No. 26-E.3-49

As stated in Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR, the Project will capture and reuse up to approximately 625,000 gallons of water. Figure IV.G-1 of the Draft EIR and Figure 3 of the Hydrology and Water Quality Report demonstrate the proposed capture and reuse system for the capture volume to meet the LID 85th percentile design storm event. The Project is proposing a storage capacity of up to approximately 625,000 gallons to provide ample capacity to capture the volume from the 85th percentile storm event in compliance with the LID Ordinance. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The calculation yielding 636,000 gallons of stormwater storage is incorrect as the Project will not be 100 percent impervious, as stated in the Draft EIR and previous responses to comments. Stormwater detention structures will be designed to fit within the Project Site footprint.

Comment No. 26-E.3-50

29	5.2.2	If capture and use is later determined not to be feasible...	<p>How will feasibility be determined? Can it not now be determined? If capture and re-use is not feasible, how could bio-filtration/bio-retention be feasible? Would it require less volume, have a smaller footprint?</p>
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Response to Comment No. 26-E.3-50

Refer to Response to Comment Nos. 3-4, 13-8, 26-111, 26-E.1-6, 26-E.1-63, 26-E.3-15, 26-E.3-45, and 26-E.3-49. As discussed therein, the Project will comply with the City of Los Angeles' LID Ordinance, which describes infeasibility criteria. Feasibility of treatment is confirmed by the City of Los Angeles during the regulatory plan check process. If biofiltration/bioretenion is used for LID treatment, volume and footprint requirements will be finalized subject to the approval of the City of Los Angeles during the plan check process. See Section 5.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR.

Comment No. 26-E.3-51

30	5.3	Existing condition and proposed impact analysis, second bullet points	Reads like "boilerplate" where it should be actual methodology. State actual vicinity used for this assessment, not what is "usually" done
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Response to Comment No. 26-E.3-51

As stated on page 30 of Appendix H, Hydrology and Water Quality Report, of the Draft EIR, the Project's underlying groundwater basin is the Coastal Plain of Los Angeles–Hollywood Groundwater Basin, as discussed in Response to Comment No. 26-112. Section 5.3 of the Hydrology and Water Quality Report lists the considerations that were reviewed and analyzed to determine the significance of the Project as it relates to the level of the underlying groundwater table of the Coastal Plain of Los Angeles–Hollywood Groundwater Basin. These considerations are discussed throughout the impact analysis in Section 6 of the Hydrology and Water Quality Report.

Comment No. 26-E.3-52

30	5.4	In addition to... discusses the impact... on groundwater quality...	No methodology described. What methods were used to assess possible groundwater quality impacts?
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Response to Comment No. 26-E.3-52

The methodology used to assess groundwater quality and hydrology is discussed on page IV.G-28 of the Draft EIR and in Section 6.1.4 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR.

Comment No. 26-E.3-53

32-33	6.1.3	...It is anticipated that... impacts... would be less than significant	Section discusses treatment and conveyance of dewatering discharge, but not at all the potential impact of that dewatering on groundwater hydrology. Does not support anticipation that impacts on groundwater hydrology during construction would be less than significant.
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Response to Comment No. 26-E.3-53

Refer to Response to Comment Nos. 11-25 and 16-68 regarding groundwater quality. As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment No. 11-5 regarding the Draft EIR's analysis of impacts related to dewatering. Also refer to the Dewatering Report (Appendix FEIR-13 of this Final EIR) that was prepared in response to comments on the Draft EIR, which confirms the conclusion in the Draft EIR that impacts associated with temporary dewatering during construction would be less than significant.

Comment No. 26-E.3-54

33	6.1.4	...Project would not result in any substantial increase in groundwater contamination through the release of hazardous materials...	Could the project result in increase in groundwater contamination by attracting nearby contaminant plumes (if any) during dewatering operations? This is not addressed.
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Response to Comment No. 26-E.3-54

Refer to Response to Comment No. 26-E.3-10 regarding groundwater contamination and plumes.

Comment No. 26-E.3-55

33	6.2.1	The Project is expected to increase or maintain from 90% impervious. At full project buildout... the Project Site will be 90% impervious or less.	Inconsistent. Which is it: increase or maintain impervious %, or maintain Or [sic] decrease? If possibly increase, then proposed Hydro-Calc output needs to be reported for impervious > 90%. See comment under 5.1 above.
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Response to Comment No. 26-E.3-55

Refer to Response to Comment No. 26-E.3-47 regarding the amount of impervious area.

Comment No. 26-E.3-56

34	6.2.1	With Project BMPs in place... not cause flooding during 50-yr storm event...	HydroCalc assumes no impervious % increase, but text states there may be increase. Is there flooding under existing conditions? Does that matter? Is significant impact only if there is additional flooding, or if there is any flooding?
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Response to Comment No. 26-E.3-56

Refer to Response to Comment No. 26-E.3-47 regarding the amount of impervious area. There is no flooding under existing conditions.

Comment No. 26-E.3-57

35-36	6.2.3	Groundwater Hydrology	Argument for less-than-significant impact on groundwater recharge may be credible. Groundwater hydrology needs development. Will there be no operational groundwater pumping to keep the below-ground structures dry, or will it be so minimal as to not matter much? Could the below ground structures change GW flow rate or direction in any significant way?
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Response to Comment No. 26-E.3-57

The Project will require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment Nos. 16-85 and 26-E.1-65 regarding groundwater recharge and groundwater flow, respectively.

Comment No. 26-E.3-58

36	6.2.4	The Project does not... an area of known GW contamination...	This would be easier to evaluate/accept if there [sic] a groundwater contamination map was presented that showed its lack in the vicinity, either here or in section 3.4.
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Response to Comment No. 26-E.3-58

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Draft EIR's analysis of groundwater contamination. The commenter has provided no evidence to support their claim that the information presented in the Draft EIR is inaccurate.

Comment No. 26-E.3-59

37	6.3.1	...the Project could cumulatively increase stormwater runoff flows...	Statements are inconsistent. If the project won't have a net impact on stormwater flow volumes or drainage patterns, then it won't contribute to any cumulative impacts.
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Response to Comment No. 26-E.3-59

Appendix H, Hydrology and Water Quality Report, of the Draft EIR has been updated to state that cumulative impacts associated with the Project would be less than significant and would not cumulatively increase stormwater runoff flows. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-E.3-60

37	6.3.3	The Project... could cumulatively increase groundwater demand.	How could it increase demand? This is the first place there is the implication that the project might affect groundwater hydrology at all after construction drawdowns.
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Response to Comment No. 26-E.3-60

Appendix H, Hydrology and Water Quality Report, of the Draft EIR has been updated to restate that cumulative impacts associated with the Project will be less than significant and would not cumulatively increase groundwater demand. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 26-E.3-61

37	6.3.3	Project would maintain or increase amount of impervious surface... have a less than significant impact on GW recharge... highly urbanized area... minimal in context of regional GW basin	This requires further explanation.
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Response to Comment No. 26-E.3-61

The Project would not increase the amount of impervious area, and the text referenced in this comment has been revised; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The regional groundwater basin is much larger than the Project, and since the Project is not proposing an increase in the amount of impervious surface and is small in scale when compared to the much larger regional groundwater basin, the Project would have a less-than-significant impact on groundwater recharge.

Comment No. 26-E.3-62

38	6.3.4	The Project would comply... therefore would be less than significant	Assumption that compliance with laws, rules, and regulations assures lack of significant impact should be supported, rather than assumed.
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Response to Comment No. 26-E.3-62

The language referenced by the commenter in Section 6.3.4 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR is preceded by a discussion of applicable regulations that the Project would be required to comply with. The groundwater quality impact analysis on pages IV.G-30 to IV.G-33 of the Draft EIR discusses how compliance with applicable regulations would result in a less-than-significant impact. Typically, laws, rules, and regulations for hydrology and water quality have been shown to empirically improve upon the desired outcomes so compliance with the laws, rules, and regulations does lead to a less-than-significant impact.

For example, according to the Bureau of Sanitation website, in November 2011, the City of Los Angeles adopted the Stormwater LID Ordinance (Ordinance No. 181,899, updated September 2015 by Ordinance No. 183,833) with the stated purpose of:

- Requiring the use of LID standards and practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;

- Reducing stormwater/urban runoff while improving water quality;
- Promoting rainwater harvesting;
- Reducing offsite runoff and providing increased groundwater recharge;
- Reducing erosion and hydrologic impacts downstream; and
- Enhancing the recreational and aesthetic values in our communities.

Comment No. 26-E.4-1**Exhibit 4—Linscott, Law & Greenspan letter**

Linscott, Law & Greenspan, Engineers (LLG) is submitting these comments on the Transportation section study and underlying Transportation Assessment in the Draft Environmental Impact Report¹ (the “Draft EIR”) prepared for the TVC 2050 Project (the “TVC Project”) located at 7716–7860 West Beverly Boulevard (the “Project Site”) in the City of Los Angeles. The Transportation section is provided within Section K of the Draft EIR and is based in part on the Transportation Assessment² prepared for the TVC Project. The Transportation Assessment is included in Appendix M-1 of the Draft EIR.

Pages IV.K-28 and IV.K-29 of the Draft EIR provide four Thresholds³ for assessing whether the TVC Project would result in a significant impact related to transportation/traffic:

“Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

“Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) [i.e., Vehicle Miles Traveled or VMT];

“Threshold (c): Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. [sic] farm equipment); or

“Threshold (d): Result in inadequate emergency access.”

As discussed herein, the Transportation section in the Draft EIR erroneously, inaccurately, and/or without substantiation concludes that the TVC Project would have less than significant impacts related to each of the four thresholds. These analytical errors are not minor differences in assumptions or modeling choices but are fundamental flaws that go to the core of the traffic analysis.

- ¹ *Draft Environmental Impact Report—TVC 2050 Project*, Environmental Case: ENV-2021-4094-EIR and State Clearinghouse No. 2021070014, City of Los Angeles, July 2022.
- ² *Transportation Assessment for the Television City 2050 Specific Plan Project*, Gibson Transportation Consulting, Inc., October 2021, Appendix M to the Draft EIR.
- ³ Other Thresholds may be applicable to the Project that were not assessed in the Draft EIR.

Response to Comment No. 26-E.4-1

The comment represents an introductory statement, which repeats the thresholds of significance used in the transportation analysis (refer to page IV.K-29 of Section IV.K, Transportation, of the Draft EIR). This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As discussed in Response to Comment Nos. 26-E.4-2 through 26-E.4-19, the transportation analysis is not fundamentally flawed and properly addresses all relevant CEQA thresholds of significance. The four thresholds identified in the comment, from the State's CEQA Appendix G Environmental Checklist Form, are the only four transportation thresholds of significance recognized by the City. The transportation analysis has been completed under the direction of LADOT and in accordance with CEQA and guidance from OPR.

Comment No. 26-E.4-2

The Project Site is located in a highly congested area. It is bounded by Fairfax Avenue to the west, Beverly Boulevard to the north, private property and The Grove Drive to the east and private property and a private alleyway to the south (referred to in the Draft EIR as the "shared access drive"). Fairfax Avenue is a designated Avenue II, Beverly Boulevard is a designated Modified Avenue I, and the Grove Drive is a designated Collector Street.

Two of the streets adjacent to the Project Site—Beverly Boulevard and Fairfax Avenue—are listed in the City's High Injury Network and are represented on the graphic pasted below. Third Street, located immediately south of the Project Site, is also on the City's High Injury Network. As explained on the Vision Zero page on the website⁴ for the City's Department of Transportation (LADOT) "The High Injury Network represents 6% of city streets that account for 70% of deaths and severe injuries for people walking." Accordingly, per LADOT's own statistics and policies, pedestrians immediately adjacent to the Project Site are already vulnerable and impacted related to safety.

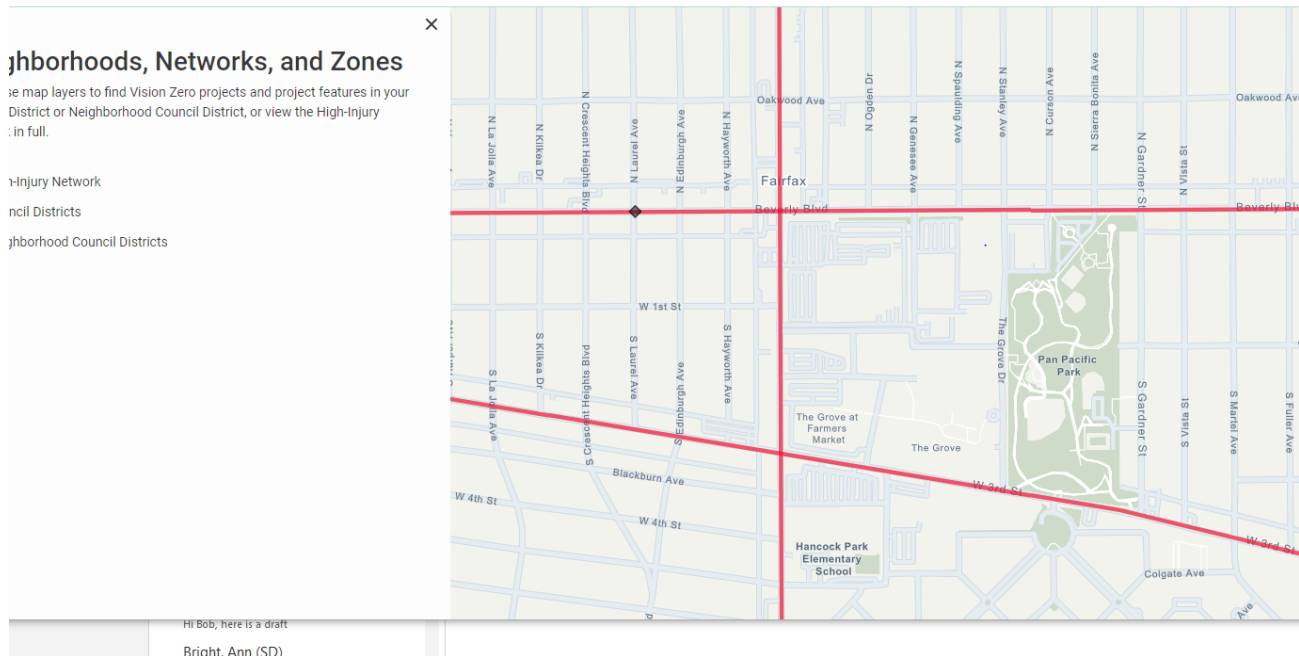
VISION ZERO

Maps

The High-Injury Network (HIN) represents 6% of city streets (over 450 miles) that account for 70% of deaths and severe injuries for people walking. LADOT focuses comprehensive safety improvements on a subset of the HIN where the highest concentrations of traffic deaths and severe injury crashes occur, represented by the Priority Corridors and Intersections.

Use this map to explore safety projects across the city (click **Projects**) and understand the distribution of different safety treatments (click **Project Features**).

Click **Memorial Map** to see traffic deaths in Los Angeles between 2012 and 2018. If you know someone who was the victim of a traffic fatality, please email visionzero@lacity.org to create a digital memorial.



- 4 <https://ladotlivablestreets.org/programs/vision-zero-zero/maps> and <https://ladotlivablestreets.org/programs/vision-zero-zero/maps>

Fairfax Avenue, Beverly Boulevard and The Grove Drive are designated part of the Pedestrian Enhanced Network that aims to promote walking. The northern portion of The Grove Drive is part of the Neighborhood Enhanced Network of the Mobility Plan, which reflects the synthesis of the bicycle and pedestrian networks and serves as a system of local streets that are *slow moving and safe enough* to connect neighborhoods through active transportation. The southern portion of The Grove Drive is part of the Bicycle Enhanced Network that is intended to provide a low-stress network of bicycles paths and lanes.

Existing vehicular access to the Project Site is from two driveways on Fairfax Avenue and the main entrance at the signalized intersection of Beverly Boulevard and Genesee Avenue.

The following comments explain some of the key reasons why the Draft EIR fails to report potentially significant impacts related each threshold.

Response to Comment No. 26-E.4-2

This comment provides a description of the streets surrounding the Project Site and existing Project Site access. Section IV.K, Transportation, of the Draft EIR accurately identifies existing Project Site access, the existing streets in the Project vicinity, their designations as set forth by the Mobility Plan, and the streets that are part of the City's High Injury Network. Note that the Project Site is bounded to the south by the Southern Shared Access Drive. To clarify the commenter's description of "private property and a private alleyway to the south," as discussed on page II-2 of Section II, Project Description, of the Draft EIR, the Southern Shared Access Drive is a privately owned right-of-way that is partially located on the Project Site and partially located off-site on the adjacent properties to the south. While not a component of the Project, the Southern Shared Access Drive provides shared access to the Project Site and the adjacent properties to the south from The Grove Drive. In addition, note that 3rd Street is not located "immediately" to the south of the Project Site as stated by the commenter. Also note that, as discussed on page IV.K-23 of Section IV.K, Transportation, of the Draft EIR, there are two driveways along Beverly Boulevard with existing curb cuts that are not currently used for access. These two driveways were not mentioned by the commenter.

The transportation analysis in the Draft EIR comprehensively evaluates each of the transportation significance thresholds included on page IV.K-28 of Section IV.K, Transportation, of the Draft EIR, as set forth by Appendix G of the CEQA Guidelines. As demonstrated in the following response to comments, the commenter does not provide any substantial evidence to support the claim that the Draft EIR fails to report significant impacts related to these thresholds.

Comment No. 26-E.4-3**Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities**

The assessment of potential conflicts with a transportation program, plan, ordinance or policy begins in the Draft EIR on page IV.K-45, including in Table IV.K-1 (consistency with Mobility Plan 2035) beginning on page IV.K-47, and Table IV.K-2 (consistency with Wilshire Community Plan) beginning on page IV.K-58. The Draft EIR's evaluation of the Project's consistency with Mobility Plan 2035 is vague, conclusory and incorrect in multiple respects.

Mobility Plan 2035 Policy 1.1, Roadway User Vulnerability

In Table IV.K-1, Policy 1.1, Roadway User Vulnerability is stated as follows: "Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user." The first sentence in response to Policy 1.1 states: "No Conflict. The most vulnerable roadway user

is typically a pedestrian, and the Project would include several improvements that prioritize pedestrian safety and the pedestrian experience, including landscaping, sidewalk improvements, and bus stop improvements around the Project Site perimeter.” Further, according to Policy 1.1 in Mobility Plan 2035 (page 62), “Roadways should operate in a manner that considers the presence of **people who walk and bike, children, the elderly, and the mobility-impaired**” [emphasis added]. The Draft EIR ignores the fact that the Project proposes the following which will imperil pedestrians:

- Construct two new driveways along Beverly Boulevard, including a new private street for Project cars and trucks immediately adjacent to the existing Broadcast Center apartments and Erewhon Market, which each currently generate a substantial number of pedestrians along Beverly Boulevard;
- Construct a new fully signalized private street intersection on The Grove Drive at the location of an existing pedestrian-only crossing on The Grove Drive that currently provides access for pedestrians to the existing Pan Pacific Park and Holocaust Museum LA, thereby forcing pedestrians to be in conflict with the forecast 5,600 daily cars and trucks⁵ entering and exiting the Project Site; and
- Construct two new driveways for vehicles and trucks from the southern alleyway, along with introducing passenger loading and pedestrian and bicycle access in this service alleyway that has limited visibility.

The Draft EIR also fails to evaluate potential impact to bicyclists, also a vulnerable roadway user as recognized by Policy 1.1. Beverly Boulevard, as well as Fairfax Avenue are designated for Tier 3 separated bike lanes, and the southerly segment of The Grove Drive connecting to Third Street are Tier 2 separated bike lanes (Map D2 in Mobility Plan 2035). In addition, The Grove Drive is part of the Neighborhood Enhanced Network and Bicycle Enhanced Network. Additional driveways proposed by the Project will create hazards to current and future bicyclists which have not been evaluated in the Draft EIR.

As a starting point, the Project should be required to utilize its existing Beverly Boulevard signalized driveway opposite Genesee Avenue and existing driveways on Fairfax Avenue for vehicular access and not construct new driveways along Beverly Boulevard and/or on The Grove Drive that would otherwise significantly impact pedestrian safety.

The Project also proposes (e.g., on page II-21 in Section II. Project Description of the Draft EIR) to introduce pedestrian circulation and access along the north side of the southerly alleyway drive. The alleyway is an east-west private alley between The Grove Drive and Fairfax Avenue separating the Project Site on the north side and, moving east to west on the south side, a self-storage facility, The Grove, and the Farmer’s Market service area. There are currently no sidewalks or other walking paths along the entire extent of the alleyway. Introducing pedestrian facilities onto the alleyway as proposed by the Project

creates significant hazards to both pedestrians and motorists as it will likely encourage pedestrians to travel on the alleyway drive beyond the future walking paths. This Project-related hazard to future pedestrians on the alleyway is not disclosed in the Draft EIR.

The Project also appears to propose a new pedestrian crossing on The Grove Drive at its intersection with the service alleyway. As described on page 31 of the Transportation Assessment and depicted on Figure 17, page 54 of the Transportation Assessment, this new pedestrian crossing would be uncontrolled (i.e., no traffic signal control or other features to prioritize and promote safe pedestrian crossings). These features currently exist at the existing pedestrian crossing on The Grove Drive at the location of the Project's proposed new private street intersection. As the controlled pedestrian crossing would be removed by the Project, and the proposed new pedestrian crossing would be uncontrolled, the Project would further degrade pedestrian safety. Further, there are no sidewalks on the east side of The Grove Drive for pedestrians to safely utilize if a pedestrian crossing was provided at the service alleyway. Finally, this proposed new pedestrian crossing would further encourage pedestrians at the service alleyway utilized by cars and trucks and therefore create new hazards which have not been evaluated or disclosed in the Draft EIR.

As proposed, the Project is in conflict with the Mobility Plan resulting in a significant impact under Threshold (a).

⁵ Estimate based on 35% of Project Site traffic using the Project's new The Grove Drive private street per Figure 19B of the Transportation Assessment and the forecast of 16,044 daily trips generated by the Project per Table 12 in the Transportation Assessment. This estimate is likely understated for the reasons set forth in these comments.

Response to Comment No. 26-E.4-3

The comment contains several inaccurate and unsupported conclusory statements and assertions. The comment does not provide any evidence supporting its statement that the new driveways along Beverly Boulevard, The Grove Drive, and the Southern Shared Access Drive would conflict with Mobility Plan Policy 1.1. Further, the comment incorrectly states that the Project would construct a new private street adjacent to Broadcast Center Apartments and Erewhon Market; it should be noted that internal circulation paths are not streets. The Project does propose to construct a new signalized driveway along The Grove Drive, but that new signal will not eliminate the protected crosswalk that currently exists near the north end of the Holocaust Museum and Pan Pacific Park. Rather, the new signal will improve the protected crosswalk into a signalized intersection. The unprotected crosswalk at The Grove Drive and the Southern Shared Access Drive was proposed by the Holocaust Museum expansion and is simply repeated in Figure 17 of the Transportation Assessment (included in Appendix M.1 of the Draft EIR) for continuity.

The comment incorrectly calculates the number of vehicles at the signalized entrance on The Grove Drive. Based on the Project trip distribution percentages shown in Figure 19B of the Transportation Assessment and the gross daily trip generation in Table IV.K-5 of the Draft EIR, approximately 2,287 Project vehicles per day would cross the north crosswalk, not 5,600. The pedestrian crosswalk is proposed for the north leg of the signalized intersection, and, therefore, there would be no conflict between pedestrians and any Project vehicles entering/leaving the Project Site to/from the south. In addition, the majority of these vehicles will enter the Project Site during the morning peak hours ahead of the standard operational hours for the Holocaust Museum and The Grove. The crosswalk across the north leg of the intersection would be fully controlled by the intersection traffic signal, and the intersection would be equipped with WALK/DONT WALK indications. Additionally, LADOT would evaluate the need for countdown pedestrian displays and advanced pedestrian indications (API).

Figure 22 on page 80 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the volume of Project vehicles that will use the Southern Shared Access Drive is minimal, even during the peak hours of the day. There are no pedestrian sight distance issues nor are there sight distance restrictions for vehicles entering the Southern Shared Access Drive from either northbound or southbound off The Grove Drive. Eastbound pedestrians and vehicles exiting the Southern Shared Access Drive will have a clear view of southbound traffic on The Grove Drive because the southeast parking structure would be set back from The Grove Drive's westerly curb, and the Project would widen the existing sidewalk, as described on page IV.K-50 of the Draft EIR. The Project driveways from the Project onto the Southern Shared Access Drive would be designed with adequate sight distance to meet City standards in order to be approved by LADOT. Therefore, contrary to the statement in the comment, the Southern Shared Access Drive or its intersection with The Grove Drive does not have limited visibility problems.

As discussed in Section IV.K, Transportation, of the Draft EIR, although the Project would result in more ingress and egress points than existing conditions, the Project driveways would be designed to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists and provide safer pedestrian crossings through pedestrian signal phasing and continental crosswalks. The Project driveways along Fairfax Avenue and Beverly Boulevard would not interfere with the planned bicycle facilities in the Citywide Bicycle Plan and each driveway would be designed with sufficient sight distance to allow exiting traffic to be able to see bicycles in the bike lanes. Additionally, the Project would construct a new signalized access point on The Grove Drive, a Collector Street, thereby distributing vehicular access more evenly along the street frontages and across the Project Site.

The Project supports bicycle facilities in the Study Area and does not conflict with the long-range plans for additional bicycle lanes along Fairfax Avenue and Beverly Boulevard although LADOT indicates that these two improvements are at least 5 to

10 years away. The Draft EIR has considered the bicycle plan, and the Project would not in any way interfere with or discourage the provision of these facilities and leaves the same amount of available roadway space for future bicycle lanes as is available today. Contrary to the implication in the comment, vehicular access points on streets with existing or proposed on-street bicycle lanes do not automatically constitute a conflict or a safety hazard. Driveways and bicycle lanes can be designed to co-exist by following standards and best practices, and plans for all Project access points would be fully reviewed and approved by City staff and LADOT prior to installation.

Refer to Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, for additional discussions of pedestrian safety, access to The Grove Drive and the ramifications of eliminating the proposed driveway on The Grove Drive as suggested in the comment.

The Project has joint access rights to the Southern Shared Access Drive and the two vehicular driveways proposed onto the roadway would have many fewer vehicle trips as compared to the signalized driveways.

In terms of pedestrian access along the southern portion of the Project Site, this pedestrian access has existed for decades to provide a direct connection for the employees of the Project Site with the commercial uses at The Grove and The Original Farmers Market. As discussed on page IV.K-57 of the Draft EIR, along portions of the southern property line, sidewalks, screening, and/or planting areas would be introduced. In particular, along the Southern Shared Access Drive, the Conceptual Site Plan includes a 10-foot-wide frontage area.

If a new pedestrian gate is constructed in the southeast portion of the Project Site, it would be accompanied by a sidewalk along the north side of the Southern Shared Access Drive connecting the pedestrians entering/leaving the Project Site to The Grove Drive. This sidewalk would be constructed north of the current Project Site fence line and, thus, would not affect the existing width of the Southern Shared Access Drive.

Refer to Response to Comment No. 26-165 regarding the Draft EIR's comprehensive analysis of the Project's consistency with the Mobility Plan and conclusion that the Project would not conflict with the Mobility Plan.

Refer to Response to Comment Nos. 9-29 and 26-E.4-12 regarding transportation-related hazards and safety.

Comment No. 26-E.4-4*Mobility Plan 2035 Policy 1.8, Goods Movement Safety*

The Draft EIR does not at all address Mobility Plan 2035 Policy 1.8, Goods Movement Safety. This policy in Mobility Plan 2035 states (page 69) “Truck movement should be limited to the arterial street network as much as possible since these streets have the lanes and wider turning radii to accommodate these large vehicles. Land use along heavily used truck routes should also coincide with goods movement priorities and limit interaction with residential uses.”

The Project is not consistent with Policy 1.8 as it proposes truck movements via a new signalized private street on The Grove Drive (a designated Collector Street, not an arterial), a private alleyway that itself is accessed from Grove Drive, as well as via a new driveway on Beverly Boulevard immediately adjacent to an existing residential building. As discussed in a following section, it is demonstrated that large trucks will not be able to complete turns to and from the proposed driveway on The Grove Drive or the alleyway. The Draft EIR fails to disclose all of these impacts. The Project should be revised to limit truck activity to its existing driveways on Beverly Boulevard and Fairfax Avenue which are better suited to handle truck movements and is consistent with the Mobility Plan 2035 policy.

As proposed, the Project is in conflict with the Mobility Plan resulting in a significant impact under Threshold (a).

Response to Comment No. 26-E.4-4

Refer to Response to Comment No. 26-165 regarding Mobility Plan Policy 1.8, which is not applicable to the Project. The Project’s access and circulation plan allows trucks to enter/leave the Project Site via The Grove Drive, which is designated as a Collector Street. From that driveway, trucks travel directly to the arterial street system—either Beverly Boulevard or 3rd Street. This is consistent with the function of a Collector Street.

Refer to Response to Comment No. 26-170 for a discussion of truck movements in and out of the Project along The Grove Drive. The commenter presents examples of truck turns made by a WB-67 truck, which is the largest truck allowed on California roadways. This vehicle type represents a very infrequent occurrence at the Project Site, as most production vehicles are smaller. The Project is proposing a two-foot roadway widening on The Grove Drive to provide a dedicated northbound left-turn lane into the Project driveway, which will allow trucks to utilize The Grove Drive signalized entrance without any

operational problems. Trucks of any other size can be accommodated at The Grove Drive entrance or along the Southern Shared Access Drive driveways.

Refer to Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, for an additional discussion of the utilization of the various driveways serving the Project Site.

Comment No. 26-E.4-5

Wilshire Community Plan Policy 11-2, Promote Pedestrian Safety

Similar to Mobility Plan 2035 Policy 1.1, Roadway User Vulnerability, Table IV.K-2 in the Draft EIR references Wilshire Community Plan Policy 11-2 which states: “Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers.” As detailed above, the Project would cause significant safety impacts to pedestrians based on the Project’s proposed new driveways for cars and trucks on Beverly Boulevard and The Grove Drive which would adversely affect pedestrian movements to existing residential areas, recreational centers and schools adjacent to the Project Site. The Project, therefore, is in conflict with the Policy 11-2, contrary to the conclusion in Table IV.K-2, resulting in a significant impact under Threshold (a).

Response to Comment No. 26-E.4-5

Refer to Response to Comment No. 16-11 and Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding the number and location of the proposed driveways at the Project Site and pedestrian safety at those driveways. As discussed therein, the number of driveways chosen is appropriate for the amount of development proposed, and all driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety. Refer to pages IV.K-59 and IV.K-60 of the Draft EIR for an analysis of the Project’s consistency with Wilshire Community Plan Objective 11-2 and Policy 11-2.1. The commenter fails to provide any evidence to support its conclusions regarding pedestrian safety and movements or inconsistency with Policy 11-2.

Comment No. 26-E.4-6

Wilshire Community Plan Policy 15-1.1, Minimize the Number of Ingress and Egress Points

In Table IV.K-2, Policy 15-1.1 is stated as follows: “Minimize the number of ingress and egress points to and from all Boulevards II and Avenues in the Wilshire Community Plan Area.” The corresponding response acknowledges the Project Site is adjacent to Avenues as designated by Mobility Plan 2035 (i.e., Beverly Boulevard is an Avenue I and Fairfax

Avenue is an Avenue II), but fails to acknowledge the Project would *add* driveways to the adjacent Avenues: two new driveways on Beverly Boulevard and one new driveway on Fairfax Avenue that apparently would connect to multiple new private streets if developed as shown on the illustrative conceptual plan for the Project. There is no explanation in the Draft EIR regarding the feasibility of developing the Project without adding driveways and internal private streets at those locations. The finding of consistency with this policy is not supported from a traffic or engineering perspective, resulting in a significant impact under Threshold (a).

There appears to be no reason the Project could not have a successful circulation program without adding driveways. A recirculated Draft EIR should specifically analyze whether it is feasible to develop the Project without additional driveways and private streets and, if not, whether there are any policies or City priorities that would justify adding the new driveways and private streets.

Response to Comment No. 26-E.4-6

Refer to Response to Comment No. 16-11 and Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding the number and location of the proposed driveways at the Project Site and pedestrian safety at those driveways. As discussed therein, the number of driveways chosen is appropriate for the amount of development proposed and all driveways would be designed in accordance with LADOT design guidelines to ensure pedestrian safety. The analysis of the Project's consistency with Objective 15-1 and Policy 15-1.1 is included on page IV.K-63 of the Draft EIR, and the Draft EIR correctly concluded that the Project would not conflict with this objective and policy. Contrary to the commenter's statement, the analysis acknowledges the proposed new driveways. Please note that the comment incorrectly refers to internal circulation paths as "private streets."

The largest concentrations of pedestrians along the periphery of the Project Site are by far along the Fairfax Avenue and Beverly Boulevard frontages. Consolidating driveways and eliminating the driveway along The Grove Drive would increase the number of vehicles across the heaviest pedestrian frontages of the Project Site.

The Draft EIR analysis included a non-CEQA LOS evaluation of the operational performance of the four busiest driveways serving the Project Site. Table 18 on pages 162–163 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the signalized Project driveways would all operate at acceptable LOS. Accordingly, CEQA does not require the Draft EIR to analyze the Project without adding driveways. Contrary to the commenter's assertion, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 26-E.4-7*Mobility Plan Policy 2.17, Street Widening*

In Table IV.K-1, Policy 2.17, Street Widening is stated as follows: “Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening... [if] the resulting roadway would be less than the standard dimension.” The corresponding response incorrectly states “No conflict” even though it is acknowledged that the Project’s proposed widening of The Grove Drive (which would result in a 10-foot wide sidewalk, less than the required 13-foot wide sidewalk adjacent to the Project Site based on Mobility Plan 2035) to accommodate the Project’s signalized private street, thereby resulting in a substandard roadway street dimension on The Grove Drive.

As noted above, The Grove Drive is part of the City’s Neighborhood Enhanced Network (Map C4). According to Mobility Plan 2035 (page 81) “The Neighborhood Enhanced Network is a selection of streets that provide comfortable and safe routes for localized travel of slower-moving modes such as walking, bicycling, or other slow speed motorized means of travel.” Improvements to promote movements by pedestrians should be prioritized on the Neighborhood Enhanced Network, and not degraded to facilitate substantial increased travel by cars and trucks on The Grove Drive as proposed by the Project.

It is further noted that The Grove Drive is unique (and not properly evaluated in the Draft EIR) as there is no continuous sidewalk provided on the east side for the entire block between Beverly Boulevard and Third Street. This provides further emphasis on the need to provide standard sidewalks on the west side of The Grove Drive based on the lack of pedestrian facilities on the east side.

The response in the Draft EIR states the Project is seeking a waiver of the required street dedication of The Grove Drive resulting in the substandard sidewalk. There is no justification as to why the Project cannot provide the required sidewalk width per Mobility Plan 2035. Further, LADOT’s July 2020 Transportation Assessment Guidelines (the “TAG”) states in Attachment D: Plan Consistency Worksheet “If the project dedications and improvements asking to be waived are necessary to meet the City’s mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.” It is incorrect for the Draft EIR to claim a “no conflict” conclusion related to Policy 2.17, resulting in a significant impact under Threshold (a).

Response to Comment No. 26-E.4-7

The comment appears to misunderstand Mobility Plan Policy 2.17, the purpose of which is to only widen streets, even substandard streets, after considering the overall implications. The comment suggests that because The Grove Drive is part of the City's Neighborhood Enhanced Network, it should be required to provide 13-foot sidewalks in accordance with Mobility Plan standards. However, as described on page IV.K-56 of the Draft EIR, the Project would widen the sidewalk on The Grove Drive from 9 feet to 10 feet (including a 3-foot private easement), and the Project would also provide a 4-foot landscaped area behind the sidewalk for a total of 14 feet of sidewalk and landscaping. Additionally, it should be noted that the sidewalk in front of the Project Site on The Grove Drive is already the widest portion of the sidewalk along the entire stretch of The Grove Drive between Beverly Boulevard and 3rd Street and would be even wider with the Project. City staff have determined that the City's mobility needs along the Project frontage on The Grove Drive would be met even without further dedication. As stated on page IV.K-50 of the Draft EIR, careful consideration has been given to the implications (including costs, character, safety, travel, infrastructure, and environment) of all proposed street widenings, including when the resulting roadway would be less than the standard dimension. Therefore, as determined by LADOT and Bureau of Engineering, there is no conflict with Policy 2.17 and no significant impact as incorrectly stated by the comment. Based on the absence of any policies in the Mobility Plan that conflict with the Project, the Project is not inconsistent with the Mobility Plan regardless of any future determination (approval or dismissal) of the proposed waiver of dedication.

Comment No. 26-E.4-8

Wilshire Community Plan Policy 16-1.1, Acceptable Levels of Service

In Table IV.K-2, Policy 16-1.1 is stated as follows: "To the extent feasible and consistent with the Mobility Plan's 2035's and the Community Plans' policies promoting multimodal transportation (e.g. [sic] walking bicycling, driving and taking public transit) and safety, maintain a satisfactory Level of Service (LOS) above LOS "D" for Boulevards II, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS "D" for Avenues and Collector Streets." The corresponding response incorrectly states "No conflict" even though the analyses provided in the Draft EIR (for example, Tables 17 and 18 in the Transportation Assessment) shows a significant degradation of Levels of Service on adjacent Avenues and Collector Streets due to the Project. For example, **Figure 1** attached to this memorandum shows three intersections on designated Avenues with current operations at LOS E or F during the weekday AM and/or PM peak hours.

Figure 2 shows that the number of intersections operating at LOS E or F during one or both peak hours is expected in the Transportation Assessment to double in the future

condition with Project traffic. As stated on page 159 of the Transportation Assessment, LOS E operations are reported as “POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.” Similarly, the Transportation Assessment states for LOS F “FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.”

The response in the Draft EIR to Policy 16-1.1 which claims that Project traffic alone would not itself cause an intersection to move to LOS E or F is factually incorrect and inconsistent with the Transportation Assessment. The response in the Draft EIR contradicts the data provided in Table 17, page 160 of the Transportation Assessment. Table 17 shows the Fairfax Avenue/Beverly Boulevard intersection degrading during the AM peak hour from LOS D in Existing Conditions to LOS E for Existing with Project Conditions. Similarly, Table 17 shows the Stanley Avenue–The Grove Drive/Beverly Boulevard intersection degrading during the AM peak hour from LOS D in Existing Conditions to LOS E for Existing with Project conditions.

Under future conditions, Table 18 (pages 162 and 163 in the Transportation Assessment) shows that Project-traffic will significantly degrade already poor operations. For example, at the Stanley Avenue–The Grove Drive/Beverly Boulevard intersection, Table 18 reports that average motorist delay at this location due to Project traffic will increase from 104.9 seconds to 141.3 seconds during the PM peak hour (based on the Project’s trip generation estimates which are understated). Because the City’s Department of Transportation (LADOT) does not acknowledge service levels beyond LOS F (e.g., LOS F+ or LOS G), this magnitude of added delay would have certainly degraded the intersection to a worse service level. Further examination of Table 18 shows that two intersections on Fairfax Avenue—at Beverly Boulevard and at 3rd Street—are borderline crossing into the LOS F service level due to Project traffic based on the increased motorist delay caused by Project traffic. As the Transportation Assessment undercounts Project trips, if properly counted, it is anticipated that the level of service at these intersections would degrade to LOS F.

Accordingly, the “no conflict” response to Policy 16-1.1 provided in the Draft EIR is incorrect as the Project will not maintain existing service levels at nearby Avenues and Collector Streets.

Further, it is noted that while SB 743 does establish VMT as the metric for assessing potential transportation impacts due to development projects under CEQA, SB 743 does not preclude jurisdictions from establishing level of service goals/targets on its transportation network as part of land use policy making.

The Project therefore, is not consistent with the service level policy for Avenues and Collector Streets in the Wilshire Community Plan resulting in a significant impact under Threshold (a).

Response to Comment No. 26-E.4-8

As an initial matter, while SB 743 does not preclude jurisdictions from establishing LOS goals as noted in the comment, it *does* prohibit making those the basis of CEQA transportation impact findings. As discussed in Response to Comment No. 16-18, the intent of the CEQA Threshold T-1 is to ensure that development projects and plans do not preclude the City from implementing adopted programs, plans and policies. As stated in Section 2.1.4 of the TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be considered consistent. Strict conformity with all aspects of a plan is not required. The Project would not preclude the City's implementation of any future improvements to the street system or infrastructure, and the Draft EIR provided substantiating information that adequately addresses the CEQA Threshold T-1 in accordance with the methodology outlined in the TAG.

The Transportation Assessment included in Appendix M.1 of the Draft EIR provided a detailed non-CEQA operational LOS analysis of the surrounding street system in accordance with the methodology and guidelines outlined in the TAG. Specifically, Section 5B of the Transportation Assessment provided a detailed assessment of the operating LOS conditions and vehicular queuing within the Study Area during the commuter peak hours under both the existing and future intersection conditions. The commenter refers to Table 17, which details the LOS operating conditions under Existing with Project Conditions, which is a theoretical scenario in which the entire Project is completed in year 2021. In the Project's anticipated Opening Year of 2026 (even assuming full buildout of the Project by opening day), several intersections on arterial streets would operate at LOS E or F before and after the Project (Table 18 of the Transportation Assessment).

The comment states, without evidence, that the Transportation Assessment undercounts Project trip generation. Refer to Topical Response No. 10, Trip Generation, for a detailed description of the validity of the Project trip generation estimates. As such, the intersection level of service results presented in the Transportation Assessment are also valid.

Policy 16-1.1 states "to the extent feasible" to maintain a satisfactory LOS D operating conditions along Boulevards, Avenues, and Collector Streets. The Project would not cause any location to change from LOS D or better to LOS E or F during either peak hour under 2026 conditions. The Project would also implement a comprehensive TDM Program that would further reduce Project-related trips, which was not accounted for in the operational LOS evaluation. As stated in LADOT's Assessment Letter provided in

Appendix M.2 the Draft EIR, LADOT has reviewed the non-CEQA operational evaluation and determined it adequately discloses operational effects. Thus, the Draft EIR and Transportation Assessment contained in Appendix M.1 of the Draft EIR fully evaluated and disclosed the operating conditions of the street system in accordance with the City's guidelines.

Thus, the Draft EIR correctly concluded that the Project would not conflict with Policy 16-1.1, and impacts related to consistency with applicable plans, policies and goals would be less than significant.

Comment No. 26-E.4-9

Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) [i.e., Vehicle Miles Traveled or VMT]

The analysis of the Project's potential transportation impacts based on VMT is provided in the Draft EIR beginning on page IV.K-72. On page IV.K-73, it states "...LADOT's VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria." This is a critical error within the Draft EIR as LADOT documentation explicitly states that its VMT Calculator is not to be used for evaluating the transportation impacts of this type of Specific Plan entertainment project.

It is noted that the Draft EIR repeatedly describes the Project as adoption of a Specific Plan. In fact, the term "Specific Plan" appears in over 50 places in Section II. Project Description of the Draft EIR. The Project Description also states under its Project Objectives (page II-11) "Promote local and regional economic growth by creating a wide range of entertainment jobs..." In addition, the Project Description states on Page II-15 "The following types of related uses and facilities would also be permitted, as detailed in the Specific Plan: ...special events, audience and entertainment shows, museum exhibits and theaters... recreational facilities... and special event areas including the sale of alcoholic beverages..." And the Project seeks a General Plan Amendment to Regional Center purportedly based on the regional serving nature of the Project.

Within LADOT's VMT Calculator User Guide (Version 1.3, May 2020), it states on pages 2 and 3 "Although the tool [VMT Calculator] may be useful for other purposes, it is not designed to the following... Evaluate VMT impacts of regional-serving retail projects, entertainment projects, or event center... Evaluate VMT impacts of land use plans (e.g., general plans, community plans, and specific plans)."

Further, LADOT's TAG (page 2-1) provides specific instructions for evaluating the VMT impacts of land use plans (which would include specific plans per the definition provided in the User Guide) outside of the VMT Calculator:

To determine whether the land use changes and transportation system measures that are included in a proposed land use plan would have an impact on VMT, run the community plan's sub-area TDF [Travel Demand Forecasting] model for the baseline year 'no project' scenario and the future 'plus project' scenario. The future 'no project' scenario should represent the adopted RTP/SCS cumulative year conditions as incorporated into the City's model (SCAG's horizon year socioeconomic forecast for the plan area and the remainder of the City and base transportation networks not including the Mobility Plan 2035). The future cumulative 'plus project' scenario should represent the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed plan and the transportation system measures included in the proposed plan (including transportation system measures included in the Mobility Plan 2035 within the plan area and incorporated into the plan). Total VMT per service population would be calculated for all scenarios generated by land use within the project area, which is generally the plan area.

In addition, the TAG (page 2-9) states:

Event center and regional-serving entertainment projects should be evaluated to determine whether the project would result in a net increase in total VMT. A project-specific customized approach will be required to estimate VMT for such projects. The methodology should be developed in consultation with and approved by LADOT staff at the outset of the study.

These instructions to evaluate the Project based on a change in total VMT differ from the VMT per Employee metric utilized in the Draft EIR.

In summary, the VMT analysis for the Project, which is a Specific Plan for a self-described regional-serving entertainment project: (1) should not have used the VMT Calculator as explicitly stated in LADOT's VMT Calculator User Guide; and (2) should not have utilized a VMT per Employee metric. The VMT analysis as provided in the Draft EIR is incorrect and instead should follow the procedures prescribed in LADOT's TAG including utilizing LADOT's TDF model and calculating VMT based on VMT per service population and/or total VMT (and not VMT per Employee).

Response to Comment No. 26-E.4-9

Refer to Topical Response No. 8, Vehicle Miles Traveled, for a detailed discussion of the appropriateness of using the City's VMT Calculator for the Project. Topical Response No. 8 includes an explanation of why a development project implemented under a specific plan can and should be analyzed using the VMT Calculator. It also explains why

the City's definition of an "entertainment project" is not applicable to the Project and provides examples of other studio projects in the Los Angeles area that used the VMT Calculator, including Sunset Gower Studios and 8th and Alameda Studios. Contrary to the claims in the comment, and as discussed in Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, the Project would not attract regional visitor-based trips in significant quantities or frequencies. Because the Project's primary function is the production of entertainment media, and the vast majority of its trips are employee trips, it is entirely appropriate to evaluate VMT impacts on the basis of work VMT per employee. Topical Response No. 8 also includes a detailed discussion of the specific assumptions used in the Project's VMT analysis in the Draft EIR and Transportation Assessment (Appendix M.1 of the Draft EIR) that were reviewed and approved by LADOT.

As discussed in Topical Response No. 3, Permitted On-Site Uses, uses allowed within the Project Site must be consistent with the five permitted land uses (sound stage, production support, production office, general office, and retail) and the ancillary sitewide uses that support the studio and the five permitted land uses.

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation.

Comment No. 26-E.4-10

The results presented in the Draft EIR are without substantiation. For example, there is readily available transportation data to the Draft EIR preparers based on the existing 700,000+ square feet of development on the Project Site, consisting of sound stages, production support, production offices, and general office, all uses that are proposed as part of the Project. The Draft EIR preparers should have obtained travel data for existing employees at the Project Site including current trip lengths (e.g., obtained through residential zip code data), number of workdays at the Project Site, relative use of public transit (if any), etc.

The Draft EIR asserts, based on the incorrectly used VMT Calculator, that the VMT per employee is 6.7 miles. Stated otherwise, it means that the average employee on the Project Site is forecast to travel a one-way distance of 3.35 miles each day. When plotted on a map as shown on **Figure 3**, 3.35 miles is generally bounded by Beverly Glen Boulevard to the west, the I-10 Freeway to the south, Normandie Avenue to the east, and the Hollywood Hills/101 Freeway to the north/northeast. It excludes areas of high residential concentration as shown on **Figure 4** such as West LA/Santa Monica to the west, South LA and the South Bay to the south, Downtown LA and the San Gabriel Valley to the east, and the San Fernando Valley to the north.

The average commute length of 3.35 miles produced by the VMT Calculator is not accurate for the Project. As explained above, given the Specific Plan and regional-serving entertainment nature of the development, the VMT Calculator is not applicable to this Project. Project Site data substantiates that the VMT Calculator produces inapplicable results for the Project, supporting the User Guide's direction to not use the VMT Calculator for this type of project.

For example, data obtained from the U.S. Census Bureau OnTheMap feature⁶ shows that more than 50% of persons employed at the Project Site commuted more than 10 miles one-way per day: 24.5% commuted 10–24 one-way miles per day, 13.0% commuted 25–50 one-way miles per day, and 13.3% commuted greater than 50 one-way miles per day.

In addition, LLG used Big Data analytics provided by StreetLightData (SLD) which obtains data from GPS devices, such as cellphones and connected vehicles. SLD also uses other location-based data from cellphone applications actively tracking location, public census, traffic counts, and other third-party suppliers. This is an online software that provides users with powerful information to measure travel patterns and behaviors. In this study LLG used SLD to calculate the average length of vehicle trips to and from the Project Site. It is noted that the SLD represents trips by all vehicles: employees, visitors, live-taping audience members, delivery vehicles, etc. SLD normalizes all of its metrics to provide trip length, trip speed, trip circuitry, trip duration, and average daily trips. The data periods used for this analysis were Tuesdays, Wednesdays, and Thursdays for the month of April 2022, which is the latest available data. The SLD results show that the daily average one-way trip length measured to and from the Project Site is 17.1 miles.

In addition, cell phone tracking data from the traffic analytics company Placer was compiled for calendar years 2018 and 2019 related to persons (assumed to be employees) making 75 visits to the Project Site. As shown in the tables below, more than 65% of the trips to the Project Site were greater than seven (7) miles in length one-way.

CBS Studios TVCity LA Jan 1, 2019 - Dec 31, 2019 Home Location MTWThF Employees		
Distance	Employees Making 75 trips annually	Percentage
0 - 0.3 mi	0	
0.3 - 0.5 mi	0	
0.5 - 0.7 mi	0	
0.7 - 1 mi	0	
1 - 2 mi	0	
2 - 3 mi	49	5.27%
3 - 5 mi	109	11.72%
5 - 7 mi	139	14.95%
7 - 10 mi	168	18.06%
10 - 30 mi	444	47.74%
30 - 50 mi	21	2.26%
50 - 100 mi	0	
100 - 250 mi	0	
250+ mi	0	

TOTAL 930

CBS Studios TVCity LA Jan 1, 2018 - Dec 31, 2018 Home Location MTWThF Employees		
Distance	Employees Making 75 trips annually	Percentage
0 - 0.3 mi	0	
0.3 - 0.5 mi	0	
0.5 - 0.7 mi	0	
0.7 - 1 mi	0	
1 - 2 mi	0	
2 - 3 mi	39	3.79%
3 - 5 mi	144	13.99%
5 - 7 mi	175	17.01%
7 - 10 mi	219	21.28%
10 - 30 mi	405	39.36%
30 - 50 mi	47	4.57%
50 - 100 mi	0	
100 - 250 mi	0	
250+ mi	0	

TOTAL 1029

The Transportation Assessment preparers do not explain why they did not obtain empirical data related to trip lengths and other travel patterns by existing employees at the Project Site as part of the VMT evaluation. Without such data/substantiation, it is unsubstantiated that employees of this Project would only commute an average of only 3.35 miles one-way per day.

⁶ <https://onthemap.ces.census.gov/>

Response to Comment No. 26-E.4-10

The comment that the results in the Draft EIR are without substantiation is incorrect. Section IV.K, Transportation, of the Draft EIR comprehensively evaluated the potential transportation impacts of the Project using conservative assumptions and supporting evidence and concluded that impacts would be less than significant.

Refer to Topical Response No. 10, Trip Generation, for a discussion on the validity of the empirical data used to estimate trip generation for sound stage, production support and production office uses, including a comparison of actual driveway counts of existing trips at the Project Site to estimates using those trip rates. Also refer to Response to Comment Nos. 20-3 and 26-156.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. This topical response includes additional details and an example regarding how work VMT per employee is calculated in the VMT analysis. It should also be noted that the work VMT per employee analysis presented in the Draft EIR is presented in terms of one-way trips; specifically, as stated on page IV.K-30 of the Draft EIR, "*These thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of **one-way trips**...*" (emphasis added). As shown in Table IV.K-5 of the Draft EIR, the Work VMT per Employee is 6.7 miles, which represents a one-way trip. The commenter's assertion that the one-way trip length is 3.35 miles is incorrect and contrary to the facts presented in the Draft EIR transportation analysis. Refer to Response to Comment No. 26-156, which includes an explanation regarding why the VMT Calculator's estimate of 6.7 work VMT per employee does not mean that the average commute distance is half of that distance.

The alternative data sources cited in the comment (Census data, StreetLightData, Placer) are based on small, non-representative samples, cannot be isolated to employee trips, do not provide precise data, and are not approved for use by the City's traffic experts, LADOT, in VMT analysis in the City. Moreover, there is no recommendation in City or State guidance on VMT analysis to use empirical trip lengths when a model-based solution that combines trip thresholds and Project analysis is available. More importantly, it is necessary in conducting VMT analysis that both the thresholds of significance and the Project-level VMT estimates are developed using the same data source in order to ensure an apples-to-apples comparison. Therefore, the VMT analysis presented in the Draft EIR is appropriate and accurate and is consistent with CEQA and the TAG.

Lastly, as discussed in Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-E.4-9, the Project is a continuation and expansion of an existing studio, not an "entertainment center," and would not attract regional visitor-based trips.

Comment No. 26-E.4-11

In addition to the basic inapplicability of the VMT Calculator, the assumptions fed into the VMT analysis provided in the Draft EIR are erroneous and/or are not substantiated. For example:

- The Transportation Assessment explains that the trip generation forecasts for sound stages, production support, and production office uses were based on detailed empirical studies of trip generation from actual NBCUniversal operations collected in 2009 and reported in March 2010. NBCUniversal and Television City are very different studios, with different locations and types of studio uses.

Television City, for example, is all television production stages with audience participation. NBCUniversal is a larger studio complex for an international studio company with principally film and television production without audiences. Even though Television City is an operating studio with sound stages, production support, and production office uses today and data is available from those operations, there is no empirical data from the Project Site existing operations provided in the Transportation Assessment to support the trip generation rates for the existing uses that are consistent with the rates used in the Transportation Assessment. Empirical data from the Project Site should have been collected and reported in the Transportation Assessment.

- Tables 6 and 12 of the Transportation Assessment both note that the trip generation forecasts for the Project land uses were derived based on prior trip generation studies conducted at Universal Studios. A reduction of 15% is then applied in Tables 6 and 12 to the gross trip forecasts derived from the Universal trip rates based on the Project's proximity to public transit services and the expectation that some Project employees (as well as visitors) will utilize public transit in lieu of a personal automobile for travel. However, it is noted that Universal Studios is immediately adjacent to the Metro B (Red) Line station and related transit bus station. It is reasonable to assume, therefore, that utilization of public transit services by employees and visitors at Universal Studios are already accounted for in the empirical trip rates derived from these uses. Applying a second reduction for public transit use in the Draft EIR's trip generation forecast for the Project (as noted by example in Tables 6 and 12 of the Transportation Assessment) therefore results in a significant error in the VMT calculation as the number of vehicle trips generated by the Project are understated.
- An input to the Project's VMT analysis in the Draft EIR as summarized in Table 12 of the Transportation Assessment includes 7,752 employees for the 1,854,000 square feet of studio production and office facilities (or a density of 4.18 employees per 1,000 square feet of building floor area) which was provided by the Project applicant (footnote (e) in Table 12). There is no substantiation of the Project's employee estimate. In fact, as the metric used in the VMT analysis (VMT per Employee) is an average (i.e., total vehicle miles divided by the number of employees), artificially increasing the number of employees in LADOT's VMT Calculator while holding the vehicle miles constant would result in a lower VMT per Employee calculation. The Draft EIR should have, for example, consulted existing employee density data at the Project Site, which could be derived by comparing the historic employee counts to the existing building floor area.
- There is a discrepancy in the methodology for estimating the number of Project Site employees within the Draft EIR. In order to arrive at an estimated 7,752 non-retail Project Site employees for the 1,854,000 square feet of studio-related land uses that were input into the VMT Calculator, the Draft EIR and Transportation Assessment reference Table 3 of the Initial Study. (Draft EIR,

p. 72; Appendix M.3 [Table 2]) However, Table 3 of the Initial Study, bases its employee generation rate on the City's VMT Calculator but uses a completely different approach than the VMT Calculator inputs relied on by the Transportation Assessment and the Draft EIR. To arrive at the employee estimate, Table 3 of the Initial Study "[a]ssumes general retail rate for production support; general office rate for production office and general office." (Draft EIR, Appendix A, p. 68 fn. A [Table 3].) The employee estimate based on these VMT calculator land use inputs is then fed back into the VMT Calculator in combination with different, custom land use inputs in the Transportation Assessment and Draft EIR.

Finally, the trip generation forecasts for the Project as used in VMT analysis and elsewhere in the Draft EIR understate the vehicle trip generation potential of the Project because it does not include vehicle trips related to live audience studio productions. Television City is unique in that all of the existing stages at the Project Site are audience rated.⁷ For example, the Price is Right, currently taped at the Project Site, accommodates 325 audience attendees.⁸ Assuming two persons per car, this is approximately 160 inbound trips and 160 outbound trips for this show alone. Multiple live audience tapings occurring in a single day at the site would generate additional vehicle trips not accounted for in the trip generation forecast. The Project proposes 350,000 square feet of stages. With an average stage size of 18,000 square feet that would represent 19 stages and over 3,000 additional trips from audience shows.

For all the reasons noted above, the Project is not consistent with the CEQA VMT guidelines resulting in a significant impact under Threshold (b).

⁷ <https://televisioncityla.com/stages>

⁸ https://www.tripadvisor.com/ShowUserReviews-g32655-d560759-r11286741-CBS_Television_City-Los_Angeles_California.html

Response to Comment No. 26-E.4-11

Refer to Topical Response No. 10, Trip Generation, for a discussion on the validity of the empirical data used to estimate trip generation for production office, sound stage, and production support uses at the Project, including a comparison of actual driveway counts of existing trips at the Project Site to estimates using those trip rates. As discussed therein, the use of empirically developed rates from other studios is fully consistent with the LADOT TAG and CEQA. Specifically, the trip generation rates used for the proposed studio uses were established in 2009 as part of the NBC Universal Vision Plan Project Trip Generation Model (NBCU Trip Model) and have been used in a variety of more recent analyses for production studios in Los Angeles. The applicability of these rates was tested by applying the rates to the existing on-site land uses within the Project Site and comparing those results to empirical driveway counts collected at the Project Site driveways over multiple days. Based on these data, the NBCU model rates were approved by LADOT for

use in the Project's Transportation Assessment (included in Appendix M.1 of the Draft EIR).

The commenter claims that the number of Project trips was understated because transit usage may have been double-counted. Refer to Topical Response No. 11, Transportation Demand Management, for a discussion of the appropriateness of applying a 15 percent transit/walk-in adjustment to the Project trip generation estimates. Importantly, this adjustment was used to estimate the peak hour trip generation for the non-CEQA LOS analysis, which is not relevant to the analysis of transportation impacts under CEQA. The CEQA VMT analysis used daily trip estimates without the application of any adjustments, as the VMT Calculator makes its own internal assumptions regarding alternative travel modes based on the Project's location that are consistent with the City's VMT thresholds of significance. Regarding the non-CEQA LOS analysis, while the peak hour trip generation estimates did assume a 15 percent reduction attributed to the use of public transit or walking trips, it did not assume any reduction for the robust TDM program to be implemented at the Project Site. As described in Topical Response No. 11, this program is estimated to reduce trip generation between 6.9 percent and 40 percent, and therefore supports the 15 percent reduction in trips assumed in the non-CEQA LOS analysis.

The comment incorrectly claims that the estimate of Project Site employees is unsubstantiated and that existing Project Site employee density should have been scaled up to estimate employees for the Project. The employee estimate was provided in Table 3 of the Initial Study (included in Appendix A of the Draft EIR) and is based directly on employee densities from the VMT Calculator, except for the sound stage use, which was separately estimated by the Applicant using information from the Applicant's experience with other studio properties. The application of existing employee density as a single site-wide ratio would be incorrect because the mix of uses at the Project Site today is different than proposed with the Project. The Project proposes substantially more office space (both general and production office), which has a different employee density than sound stages and production support space.

There is no discrepancy in the estimation of Project Site employees and the inputs to the VMT Calculator. The VMT Calculator's custom land use feature, which was used to calculate VMT per employee for the Project, requires three inputs: daily trip generation, total employees, and trip purpose percentages. With this approach, the VMT Calculator does not separately calculate trip generation or employee totals based on the Project land uses, and, thus, there is no discrepancy. It should be noted that the employee assumptions in the VMT calculations for the Transportation Assessment and Draft EIR are the same as what was estimated in Table 3 of the Initial Study (i.e., approximately 7,752 non-retail employees and approximately 80 retail employees for a total of approximately 7,832).

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a detailed discussion of the trip generation rates, which accounted for audience shows. Section B, Visitor Trips, of Topical Response No. 10 includes accurate data about the existing audience shows. As shown therein, *The Price is Right* only hosts approximately 100 studio audience members per show, not 325 as incorrectly stated in this comment. Studio audience trips would make up a small percentage of the total daily trip generation to the Project Site and, thus, are an exceedingly small part of overall Project trip generation and VMT. As described in Topical Response No. 8, Vehicle Miles Traveled, the VMT analysis is specifically based on employee home-to-work trips (“home-based-work attraction” trip type), as recommended by the OPR Technical Advisory, because these trip types generate the vast majority of VMT in a development, such as the Project, and, thus, should be the focus of analysis and potential VMT reduction measures.

Section IV.K, Transportation, of the Draft EIR comprehensively evaluated the potential VMT impacts of the Project using conservative assumptions and supporting evidence and correctly concluded that impacts would be less than significant.

Comment No. 26-E.4-12

Threshold (c): Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. [sic] farm equipment)

Page IV.K-78 of the Draft EIR provides a one paragraph assessment (excluding the Caltrans-required freeway safety analysis) of the Project’s potential generation of hazards. The Draft EIR provides a conclusory statement that the Project’s potential impacts related to hazards would be less than significant.

The Draft EIR is substantially flawed in its assessment of safety by ignoring:

1. Safety impacts to pedestrians adjacent to the Project Site due to new and inappropriate driveways introduced by the Project;
2. Safety impacts to motorists, bicyclists and pedestrians related to the flawed geometric design of the Project’s new private street intersection on The Grove Drive;
3. Safety impacts to pedestrians related to the introduction of new driveways, passenger loading and pedestrian activity at the alleyway; and

4. Safety impacts to motorists, bicyclists and pedestrians at off-site intersections resulting from the increased vehicular traffic generated by Project's incompatible use.

Pedestrian Safety Impacts Caused by the Project

As previously described, the Project will cause significant safety impacts to pedestrians by introducing three new driveways to existing designated Avenues: Beverly Boulevard and Fairfax Avenue. One of the two new driveways along Beverly Boulevard for Project-related cars and trucks will be immediately adjacent to the Broadcast Center building which contains existing pedestrian-generating uses—apartments and a grocery store—causing the potential for pedestrian/vehicle conflicts.

In addition, the Project's proposed new signalized private street on The Grove Drive—to be used by over 5,600⁹ Project-related cars and trucks per day—would cause significant safety impacts to pedestrians who use the existing pedestrian signal to access Pan Pacific Park and Holocaust Museum LA.

⁹ As explained above this estimate is based on information in the Project's Transportation Assessment and is likely understated for the reasons set forth in these comments.

Response to Comment No. 26-E.4-12

Refer to Response to Comment Nos. 9-29 and 26-E.4-3 regarding the analysis of traffic hazards and safety. The Initial Study (included in Appendix A of the Draft EIR) provided a discussion addressing hazards due to a geometric design feature or incompatible uses on pages 73 to 74. As discussed therein, all Project access points would be designed to meet all applicable City Building Code and Fire Code requirements and would incorporate pedestrian warning systems, as appropriate. The Project was concluded to have a less-than-significant impact on safety hazards, requiring no further analysis in the Draft EIR. Nonetheless, the Transportation Assessment (Appendix M.1 of the Draft EIR) provided a detailed discussion of potential safety hazards associated with Project access (see Section 4C). As concluded therein by LADOT and Gibson, the Project driveways would not present any geometric design hazards related to traffic movement. Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, which discusses pedestrian safety.

Figure IV.K-22 on page 80 of the Transportation Assessment shows the peak hour volumes assigned to each of the driveways around the Project Site. As shown therein, the driveway adjacent to the Broadcast Center Apartments mentioned in the comment would accommodate a total two-way flow of approximately one vehicle per minute. This low volume is not expected to result in pedestrian safety problems.

The new driveway on The Grove Drive would provide a standard T-intersection, signalized intersection design which would not “cause significant safety impacts to pedestrians who use the existing pedestrian signal” as incorrectly stated in the comment. The existing pedestrian crosswalk would be incorporated into the new traffic signal in a design approved by LADOT and in effect at hundreds of signalized T-intersections across the City. Lastly, the commenter has offered no substantiation of the alleged “significant safety impacts.”

Comment No. 26-E.4-13

Hazards Caused by the Project's Proposed Private Street on The Grove Drive

The introduction of a new Project private street intersection on The Grove Drive, as well as the proposed use by the Project of the existing alleyway located along the south side of the Project Site for vehicle access, will cause substantial hazards which have not been disclosed in the Draft EIR.

- The Intersection of the Project's New Private Street with The Grove Drive Does Not Meet Standard Warrants for Traffic Signal Control. Page 147 of the Transportation Assessment acknowledges that the forecast traffic volumes at the intersection of the Project's new private street and The Grove Drive does not meet standard warrants used by LADOT, as well as generally by traffic engineers nationwide for considering installation of traffic signals. The MUTCD manual¹⁰ in Chapter 4C. Traffic Control Signal Needs Studies states very clearly “A traffic signal control signal should not be installed unless one or more of the factors described in this Chapter are met.” This is due in part based on research that has shown that installing unwarranted traffic signals would likely result in an increase in collisions. As an example, one study¹¹ concluded:

The objective of this study was to determine the change in crash history at intersections after installation of a traffic signal. Signals installed based on the warrants from an engineering study resulted in a decrease in angle collisions with an increase in less severe rear end collisions. At intersections where signal warrants were not met, there was a smaller decrease in angle collisions and a larger increase in rear end collisions...The analysis shows that the warrants given in the MUTCD should be followed when determining the need for a traffic signal installation with the installation based on an engineering study.

The Transportation Assessment states the non-warranted traffic signal is needed “...to provide safe pedestrian crossings, safe operations for vehicles entering and exiting the Project Site, and safe and orderly operations for vehicles traveling on The Grove Drive. Additionally, since the existing pedestrian crossing on The Grove Drive is signalized, maintaining this form of traffic control is recommended

so as not to degrade the existing pedestrian operation.” This is contrary to the University of Kentucky Transportation Center study noted above. What the Transportation Assessment fails to clearly state is that in fact it is the Project and its proposed private street on The Grove Drive that will “degrade the existing pedestrian operation.” Exacerbating the condition by installing a non-warranted traffic signal will not resolve the degraded safety condition, but potentially make traffic safety worse for all users (motorists, bicyclists, and pedestrians). It is further noted that the City would be potentially liable for post-Project incidents at the intersection should the non-warranted traffic signal be installed. Installing the Project private street intersection and its related non-warranted traffic signal is a hazard resulting in a significant impact under Threshold (c) that is not disclosed in the Draft EIR.

¹⁰ *California Manual on Uniform Traffic Control Devices*, Caltrans, 2014.

¹¹ *Crash History After Installation of Traffic Signals (Warranted vs. Unwarranted)*, University of Kentucky Transportation Center, January 2008.

Response to Comment No. 26-E.4-13

The comment incorrectly claims that the installation of a traffic signal to control the proposed private driveway on The Grove Drive would result in an unidentified safety hazard and degrade the existing pedestrian safety condition. The study cited in the comment is a before-and-after study of intersections which already had a history of collisions. Critically, every intersection reviewed as part of that study conducted by the University of Kentucky included a State (of Kentucky) or Federal highway for at least one of the intersecting roadways. These Kentucky highways generally have speed limits of 45 to 70 miles per hour (mph) and are often two-lane highways in rural areas with limited or nonexistent street lighting. There are often miles of uncontrolled highway (i.e., no intervening traffic signals or stop sign controls) between traffic signals.

On the other hand, The Grove Drive is a four-lane Collector street, well under 0.5 mile long, with a speed limit of 35 mph, in a highly urbanized and controlled environment in the City of Los Angeles where municipal traffic signals are typically spaced every 300 to 600 feet. There is no existing intersection with a history of angle or rear-end collisions in the section of The Grove Drive under consideration. In addition, there is an existing traffic signal to protect pedestrians crossing at this location. For these reasons, it is not remotely comparable to the conditions analyzed in the Kentucky crash study cited in the comment.

As discussed in the Transportation Assessment included as Appendix M.1 of the Draft EIR, the intersection formed by the Project driveway and The Grove Drive did not meet the signal warrants for a traffic signal based on the average shopping day conditions at The Grove and at The Original Farmers Market. Refer to pages 147–148 of the

Transportation Assessment. However, as noted therein, on the many busy shopping days of the year, the volumes along The Grove Drive increases to the point that the peak hour warrant would be met. As discussed on page 5 of the LADOT Assessment Letter (Appendix M.2 of the Draft EIR), LADOT stated that although warrants were not met for a new signal on The Grove Drive and the Project driveway, signalization is recommended by LADOT in order to provide safe pedestrian crossings, safe operations for vehicles entering and exiting the Project Site, and safe and orderly operations for vehicles traveling on The Grove Drive.

In addition, access considerations along The Grove Drive, the overall distance between control points on The Grove Drive, and pedestrian connections between the Pan Pacific Park and the Broadcast Center Apartments, the Holocaust Museum, and the Project Site all combine to support the use of a traffic signal as the best traffic control and safety strategy. LADOT reviewed these points and agreed that the traffic signal was the most appropriate traffic control alternative for this location.

Refer to Response to Comment No. 9-29 regarding the Project's less-than-significant impacts related to traffic hazards. Also refer to Topical Response No. 12, Safety and Congestion.

Comment No. 26-E.4-14

- The Proposed Private Street That Would Intersect with The Grove Drive and the Parking Entrance for the Broadcast Center Would be Blocked by Vehicle Queues from Beverly Boulevard. The Transportation Assessment acknowledges on page 146 that vehicle queues on northbound The Grove Drive "...could extend past adjacent property access points including [the Broadcast Center's driveways and] the Project's proposed signalized driveway." Review of the intersection operations analysis provided in Appendix G of the Transportation Assessment provides further data regarding the extent of the vehicle queueing, which is shown on Figure 5 for illustration and context.

As shown in *Figure 5* and based on the data in the Transportation Assessment, the northbound vehicle queue on The Grove Drive in the weekday PM peak hour is calculated to extend from 930 feet without the Project to 1,020 feet with the Project (including its proposed signalized private street intersection on The Grove Drive). As shown on Figure 5, this queue extends well past the location of the proposed Project Site private street intersection and essentially reaching the Grove shopping center parking structure. Therefore, a signalized private street intersection on The Grove Drive as proposed by the Project would introduce substantial new hazards to all roadway users. For example, when the traffic signal turns red for Grove Drive traffic, it is likely that: 1) some northbound The Grove Drive cars will be blocked within the Project's private street intersection due to the 1,020-foot queue from Beverly Boulevard; and 2) even if motorists

respect Do Not Block Intersection or similar regulatory signage, there would be no roadway capacity available on The Grove Drive for vehicles exiting the Project Site to turn into, thereby potentially trapping these motorists within the intersection when the traffic signal turns green for The Grove Drive traffic.

Figure 5 also notes that the proposed Project private street intersection will result in southbound vehicle queues on The Grove Drive blocking the existing Broadcast Center residential driveway based on the vehicle queuing data provided in Appendix G of the Transportation Assessment. This blocked residential driveway represents a roadway hazard as it will likely cause motorists to attempt unsafe vehicle maneuvers to avoid or bypass the queue of cars on The Grove Drive.

This new hazard created by the Project results in a significant impact under Threshold (c) that was not disclosed in the Draft EIR.

Response to Comment No. 26-E.4-14

Refer to Response to Comment No. 26-171 and Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding queuing along The Grove Drive. Access to the Broadcast Center Apartments' driveways is blocked at certain peak times under existing conditions. The Broadcast Center Apartments' lack of enforcement of the red curb along the west side of The Grove Drive south of Beverly Boulevard and illegal loading operations cause periodic backups on Beverly Boulevard and contribute to the signal not clearing in time to process the northbound cars traveling from The Grove Drive or the eastbound through traffic queue using Beverly Boulevard.

The additional queues along The Grove Drive caused by Project vehicles do not represent a hazard because The Grove Drive Project entrance would be signalized, and if the northbound queue from Beverly Boulevard reaches back to the Project driveway, the traffic signal will regulate vehicles leaving the Project Site until capacity on The Grove Drive is available to accommodate the additional Project vehicles. Refer to Response to Comment No. 9-29 for additional details regarding hazards.

Comment No. 26-E.4-15

- Trucks Could Not Safely Maneuver to and from the Project Site via The Grove Drive. **Figures 6A, 6B, 6C, and 6D** demonstrate that a standard interstate truck (with a 53-foot long trailer) cannot turn to and from the private alleyway or the proposed Project private street intersection without creating hazards to current and future motorists, bicyclists, and pedestrians both on The Grove Drive as well as within the Project Site. For example,

- *Figure 6A* shows that a truck cannot physically turn into the alleyway from The Grove Drive. In addition, an inbound truck on the alleyway cannot maneuver into the Project Site.
 - *Figure 6B* shows an outbound truck exiting the alleyway and turning right to southbound Grove Drive would need to cross into northbound travel lanes, creating significant hazards to all users of The Grove Drive.
 - *Figure 6C* shows that a truck turning right into the Project Site from The Grove Drive would need to cross into the private street's outbound travel lanes, creating significant hazards to all users on the Project Site.
 - *Figure 6D* shows an outbound truck exiting the alleyway and turning right to southbound Grove Drive would need to cross into northbound travel lanes, creating significant hazards to all users of The Grove Drive.

This new hazard created by the Project results in a significant impact under Threshold (c) that was not disclosed in the Draft EIR.

To be consistent with the Mobility Plan and to avoid creating significant hazards the Project should be redesigned to limit truck related activity to existing gates.

Response to Comment No. 26-E.4-15

Refer to Response to Comment No. 9-29 regarding hazards.

The comments regarding truck maneuvers into and out of the Project Site are made with numerous invalid assumptions, including:

1. That the Southern Shared Access Drive would remain at its current width if Project access were taken from that street. The Conceptual Site Plan shown in Figure II-4 of the Draft EIR shows that the Southern Shared Access Drive would be widened with implementation of the Project such that it would be able to accommodate Project vehicles. Thus, Figures 6A and 6B from the comment are inaccurate.
2. That trucks turning right into or out of the Project Site would only use the right-hand lane (and, in the case of Figure 6C from the comment, the truck is shown turning from the rightmost edge (curbside) of a wide lane rather than the left edge).

In fact, the WB-67 large trucks of the types described in the comment routinely swing wide to enter and exit driveways throughout the City, including inbound trucks swinging across the area designated for outbound traffic and vice versa. These

movements are expected, as codified in State and City guidelines. The *California Commercial Driver Handbook* (California Department of Motor Vehicles, 2019-2021) states in Section 2.7.6, Space for Turns, that drivers of large vehicles may encroach into other vehicle lanes. The *City of Los Angeles Supplemental Street Design Guide* (Los Angeles Bureau of Engineering & LADOT, May 2020) states on page 25, “The intersection corner [radius] should be designed so that the most common vehicle can negotiate a turn without encroachment into an adjacent or oncoming motor vehicle lane.” (Emphasis in original text.) It further states on page 26, “Large trucks are assumed to be able to use adjacent lanes on the departing and receiving street at all intersections.” These movements are made out of necessity by experienced drivers with extremely limited frequency compared to passenger vehicle movements, and they are not considered to be an unusual safety hazard.

Figure II-11 on page II-1148 provides an accurate depiction of WB-40 semi-trucks accessing the Project Site via the Project driveways including The Grove Drive and the Southern Shared Access Drive driveways. The trucks shown in the figure are classified as WB-40, the most common types of semi-trucks expected at the Project Site. Turning movements by WB-67 trucks described in the comment would be an infrequent occurrence at the Project Site since most of the trucks in/out of the Project Site would be WB-40 or single unit (SU) trucks under both existing and future Project conditions. Figure II-12 on page II-1149 shows the turning movement paths for WB-67 trucks turning in and out of the Project Site driveways.

It is also important to note that large trucks already use The Grove Drive. Figure II-13 on page II-1150 shows the turning movement path for a WB-40 truck turning between the Southern Shared Access Drive and The Grove Drive. These size trucks currently serve Farmers Market and The Grove shopping center and make these turns on a daily basis. In addition, the Grove shopping center has a loading dock located on The Grove Drive south of the Project Site, which requires large delivery trucks to back in from the street. When those trucks arrive and depart, they block all southbound travel lanes and, in some cases, all northbound travel lanes at the same time, but are not considered safety hazards. Traffic counts with vehicle classifications were conducted at the loading dock and at the Southern Shared Access Drive and found that trucks (not associated with the existing studio) currently use both locations during business hours. Notably, we are not aware of any safety hazards or issues associated with the existing operations of The Grove shopping center.

The Project, on the other hand, is designed so that all vehicles, including trucks, would head in and out of all designated access points (i.e., no backing in or out of the facility would be required), limiting their effect on surrounding streets, including The Grove Drive. Due to the adequate size of the Project driveways and turning radii, the addition of Project trucks would not result in a new significant safety hazard.

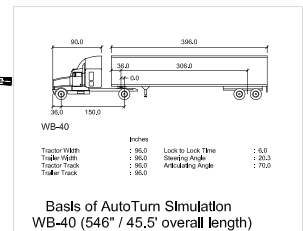
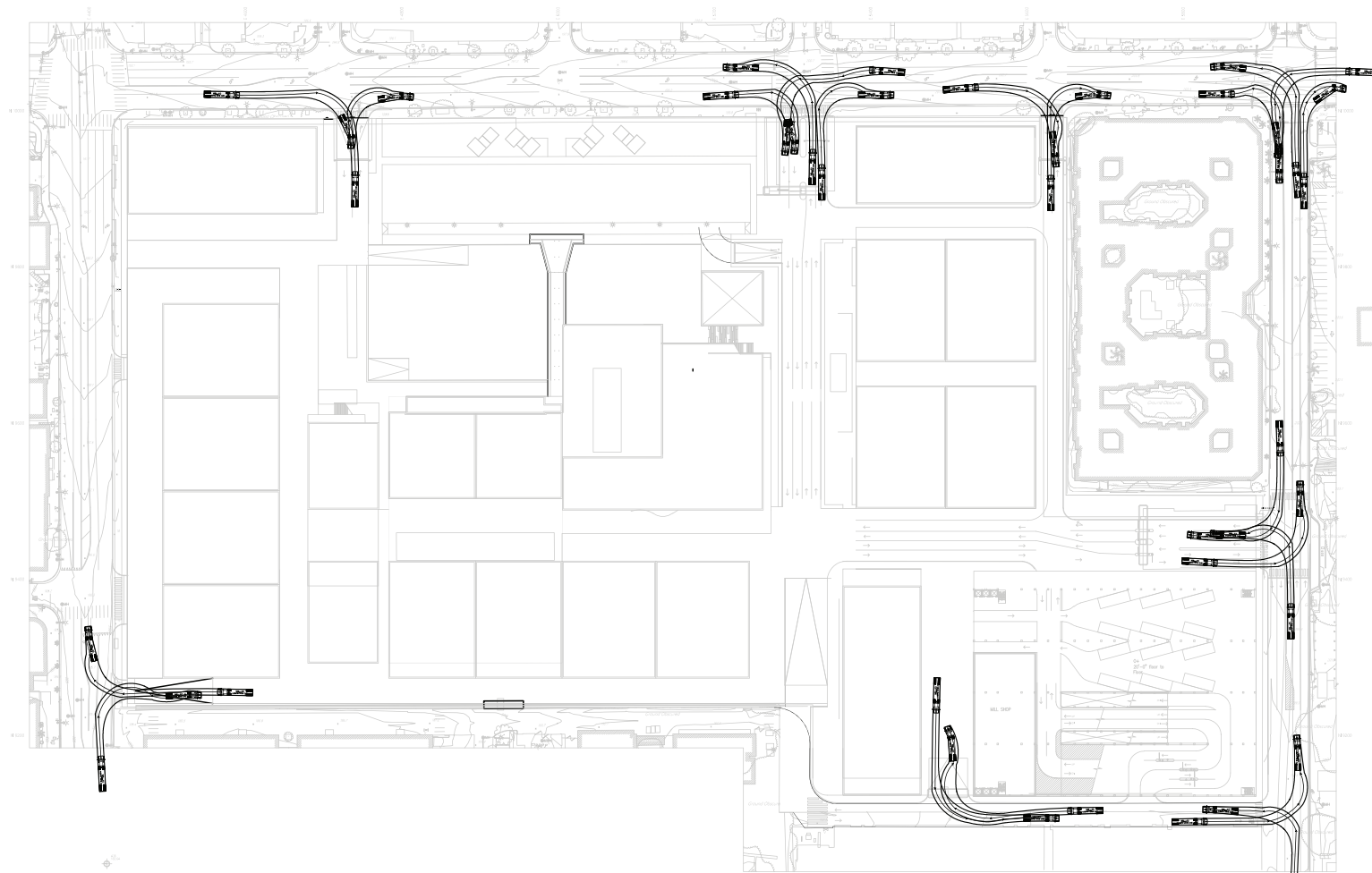
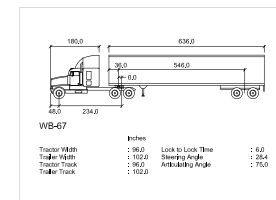
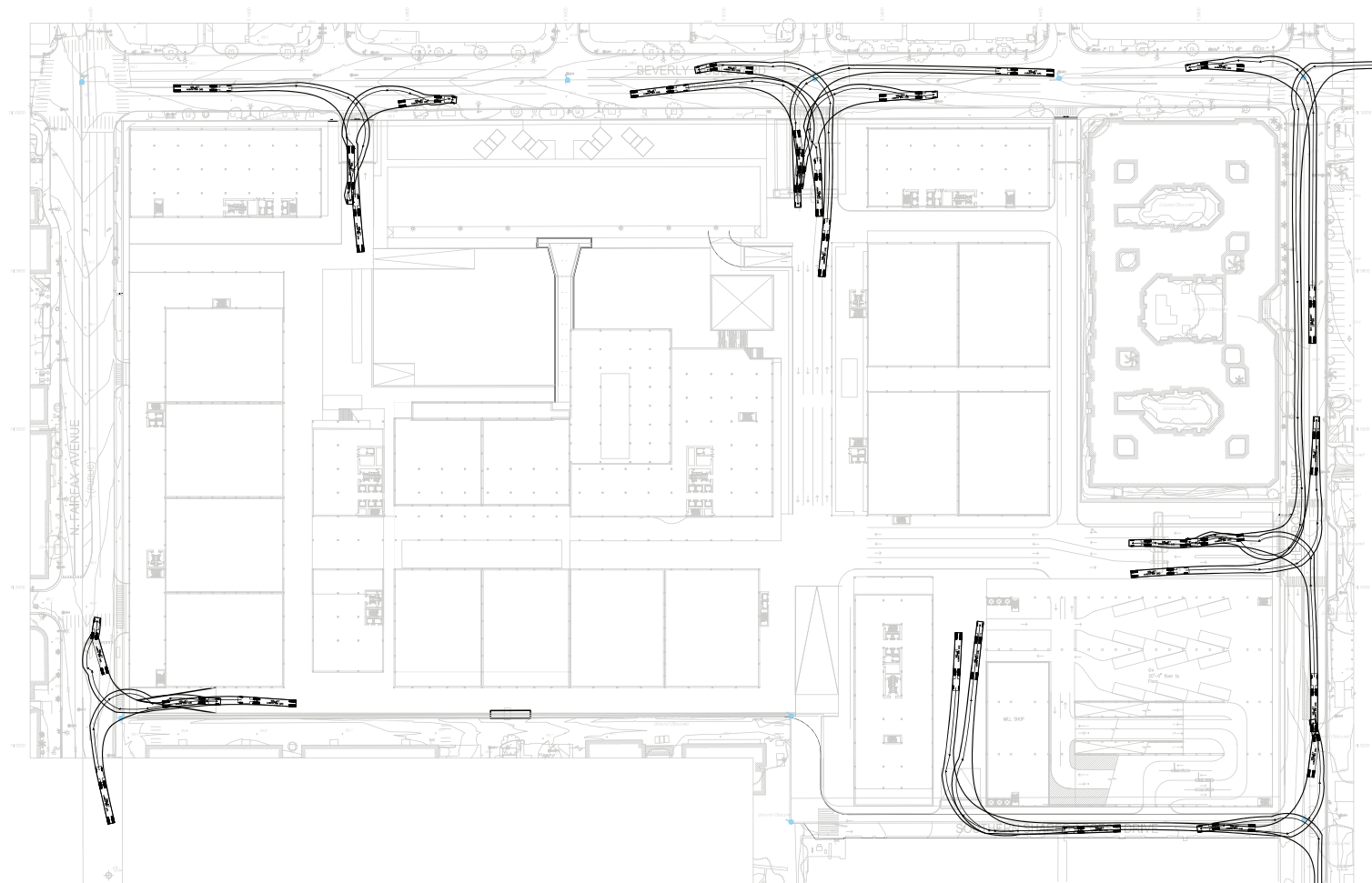


Figure II-11
WB-40 Truck Maneuvering Study



Basis of AutoTurn Simulation
WB-67 (882" / 73.5' overall length)

Figure II-12

WB-67 Truck Maneuvering Study

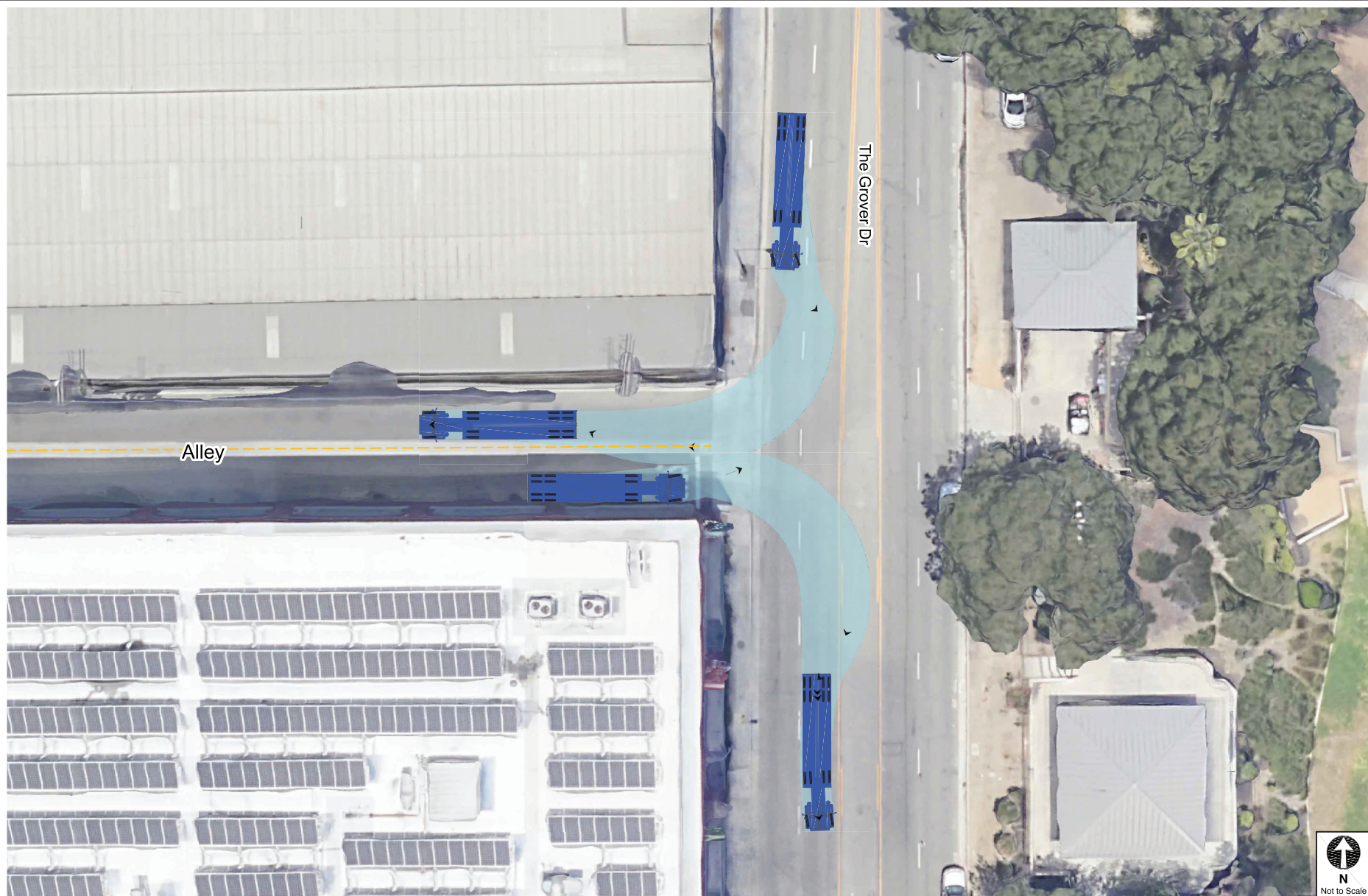


Figure II-13

Southern Shared Access Drive – Existing WB-40 Truck Turning Movements

Comment No. 26-E.4-16

- Proposed Travel Lane Geometry at The Grove Drive/Project's Private Street Intersection Would Substantially Increase Vehicle Collisions. The proposed geometry of The Grove Drive/Project Private Street intersection as provided in Appendix H of the Transportation Assessment will create hazardous conditions by substantially increasing vehicle collisions. Figure 7 has been prepared using the plan provided in the Transportation Assessment as a base, with LLG's comments provided directly thereon. These comments include:
- The proposed new left-turn lane on northbound The Grove Drive at the Project's private street intersection is shown in the Transportation Study to line up directly with the oncoming southbound No. 1 through lane. To avoid a collision southbound through traffic would need to transition approximately 10 feet to the west across the intersection, a condition that LADOT should not and would not allow (from LLG's experience, vehicles should be required to transition no more than one to two feet across an intersection). It is noted that if the intersection roadway striping is redesigned and the southbound The Grove Drive travel lanes are shifted to the west, it would cause the removal of nearly all the existing curbside street parking spaces adjacent to the Broadcast Center building and conflict with the use of curbside space for existing residential and supermarket users as occurs under existing conditions.
 - Directly across from the proposed Project's private street intersection, there is an existing curbside drop-off/pick-up lane on the east side of The Grove Drive that serves visitors (including school and tour buses) to the Holocaust Museum LA and Pan Pacific Park. If the private street intersection is constructed and traffic signal installed, the drop-off lane would no longer be able to safely function because vehicles, including buses, attempting to exit the drop-off lane would be in the middle of the intersection and not know at any time which movement (e.g., The Grove Drive traffic or Project private street traffic) has a green light. This new hazard introduced by the Project results in a significant impact under Threshold (c) that was not disclosed in the Draft EIR.

Response to Comment No. 26-E.4-16

The comment presents a critique of a conceptual striping plan for the proposed signalized Project Site driveway on The Grove Drive, claiming it would increase vehicle collisions. The conceptual striping plan is not an engineering drawing and should not be interpreted as such. After Project entitlement is complete, the detailed engineering of the driveway would be conducted during the regulatory building permit process as part of the Project's construction drawing set, which would be thoroughly reviewed by the City, including LADOT and the Bureau of Engineering, for compliance with regulatory standards, including standards that ensure safe operations.

As to the specific items identified in the comment, the detailed construction design would include the following components, as also reflected in Figure II-14 on page II-1153:

1. The 9-foot northbound left-turn lane shown may be widened to 10 feet, reducing the curb lanes in both directions to 11.5 feet.
2. The southbound approach would shift west prior to the limit line, reducing the offset across the intersection to an acceptable level. This would require removing several street parking spaces adjacent to the Broadcast Center Apartments, as noted in numbered comment 5 in Figure 7.
3. Operations for the existing passenger loading area on the east side of The Grove Drive would be considered in the intersection design.
4. See Figure II-12 on page II-1149, which shows how large trucks would access the Project Site on The Grove Drive.

As noted above, the final engineered design for this driveway would be thoroughly reviewed by LADOT and the Bureau of Engineering, and the Applicant will work with City staff to ensure that the final design meets operational and safety standards for all users. No significant impact as a result of new hazards would occur. Refer to Response to Comment No. 9-29 regarding hazards.

Refer to Response to Comment No. 26-170 regarding how the Project would not conflict with Holocaust Museum operations or create safety issues.

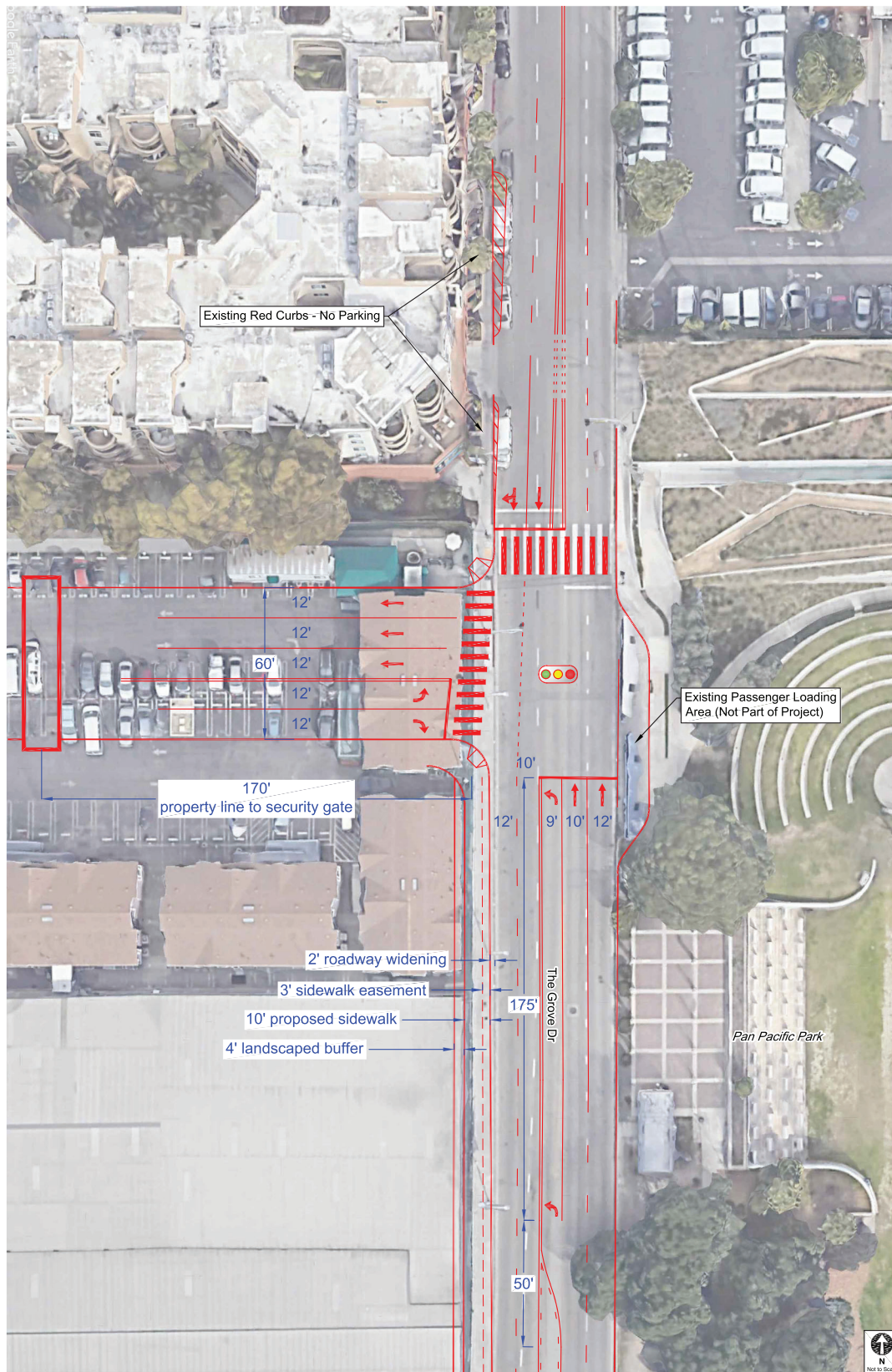


Figure II-14
 Conceptual Striping Plan
 The Grove Drive & Project Driveway

Comment No. 26-E.4-17

- Arriving Vehicles to Project Site Related to Live Audience Shows Will Queue onto Adjacent Streets. Based on Section II. Project Description of the Draft EIR, the Project would accommodate the continuation of live audience productions at the Project Site, yet the Draft EIR does not disclose attendance figures or state how issues such as arriving and departing vehicle traffic associated with this activity will be accommodated. Further, related to hazards caused by the Project and not disclosed in the Draft EIR, arriving vehicles at the Project Site's security gates for audience tapings will cause vehicles to queue onto adjacent streets such as The Grove Drive and Beverly Boulevard, increasing the likelihood of vehicle collisions, as well as safety impacts to pedestrians and bicyclists.

A vehicle queuing analysis was prepared to evaluate the potential vehicle queues at the Project Site's security gates associated with live audience tapings at the Project Site. As an example, the analysis was based on vehicle queueing that might be expected related to a show similar to The Price is Right. As previously noted, tapings of this show are produced in a studio accommodating approximately 325 guests. Assuming two guests per vehicle, this is equivalent to approximately 160 arriving guest vehicles.

In preparing the queuing analysis, the 95th percentile vehicle queue was estimated using a Poisson distribution. The 95th percentile vehicle queue is typically used by traffic engineers to determine, for example, the required length of left-turn pockets at intersections. This design parameter is based on the expectation that the left-turn pocket will be able to accommodate vehicle queues in the left-turn lane 95% of the time during the peak hour. The Poisson distribution is used to estimate the rate of vehicle arrivals over the course of the peak hour. For example, 60 peak hour left-turn vehicles will typically not arrive at the left-turn lane at a regular rate of one car per minute. In some minutes during the peak hour, two or three vehicles may arrive, while in other minutes, no vehicles will arrive. Accordingly, the Poisson distribution was used to estimate the variations in vehicle arrival rates over the analyzed peak hours.

In addition to the rate of vehicle arrivals, vehicle queueing at the Project Site's security gates will be influenced by: 1) the number of security gates attendants available to handle arriving live audience; and 2) the estimated service or processing time of each vehicle at the security gates. For this analysis, it was assumed live audience guests will be pre-instructed to arrive at the Project's proposed Grove Drive security gate. According to Figure II-4 in the Draft EIR, the proposed Grove Drive gate appears to provide three inbound lanes set back approximately 100 feet from the back of the Grove Drive sidewalk. To provide the most optimistic result for the Project, it was assumed that all three lanes would be available to process arriving live audience gates.

An M/M/s queuing model¹² was used to estimate vehicle queuing based on the number of arriving vehicles (160 vehicles arriving in a one hour period), the number of available security lanes (3)¹³, and the average service/processing time (assumed to be one minute per arriving vehicle for the security person to check-in the guest and provide instructions for parking, etc.). The M/M/s queuing model calculates average vehicle queuing during the analyzed peak hour, as well as peak queues during the hour at the 95th percentile confidence level.¹⁴

The M/M/s queuing calculations prepared for the Project's The Grove Drive security gates related to arriving live audience guests are provided in **Appendix A**. As shown in *Appendix A*, the average queue during the arrival hour of guests is six vehicles per lane. In addition, the 95th percentile (i.e., design) queue is approximately 26 vehicles per lane. Assuming approximately 22 feet per queued vehicle, this results in an *average* queue of 132 feet per lane and design queue length of approximately 572 feet, which would mean vehicles would queue onto The Grove Drive, well beyond the Project's private street intersection just for audience members for one audience show. This stopped line of cars waiting to enter the Project Site would adversely impact vehicle traffic flow on The Grove Drive and adversely affect safety for all users of The Grove Drive: motorists, bicyclists, and pedestrians. This hazard introduced to The Grove Drive by the Project was not analyzed or disclosed in the Draft EIR.

It is noted that this analysis only evaluated arriving audience members at the Project Site for one taping. Multiple simultaneous or overlapping tapings at the Project Site with live audiences, as well as other arriving vehicles requiring processing by security (visitors, trucks, etc.) will further add to the queue of vehicles waiting to enter the site. Thus, the forecast vehicle queues is a limited example and does not reflect the extent of potential vehicle stacking at the Project's The Grove Drive security gates.

¹² *Tutorial on Queuing Theory*, Kardi Teknomo, 2014.

¹³ If the number of security lanes is less, as shown on the conceptual plan, the queue lengths will be substantially longer.

¹⁴ M/M/s queuing models are appropriate tools to evaluate queues at peak utilization periods and have been used in many practical applications. For example, these models are used to determine the number of servers needed to accommodate queues of people in drive-thru lanes at fast-food restaurants, as well as lines at airline ticket counters, arenas, etc. In transportation assessments, the M/M/s queuing models have been used to estimate vehicle queuing at schools during student drop-off and pick-up, and how queues can be managed based on the number of available curbside spaces and/or valet attendants, and the number of adult monitors to assist students to and from vehicles.

Response to Comment No. 26-E.4-17

The comment makes a series of assumptions about the arrival patterns of studio audience members and the Project's operational plan to accommodate those arrivals and

concludes that there would be queuing onto the streets. The assumptions, however, are incorrect, and, therefore, so are the conclusions.

As an initial matter, the comment assumes that The Price is Right has 325 studio audience members per taping, which is incorrect. As stated in Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, which includes accurate data about the existing audience shows, The Price is Right accommodated approximately 100 studio audience members per show in year 2019 prior to the COVID pandemic. (Since the pandemic began, studio audience attendance has been lower at the smaller, more frequent shows according to the Applicant, though all audience data described in Section B are from prior to the pandemic.)

The comment also assumes that all of the studio audience members would be directed to The Grove Drive driveway to park, when in fact there are at least three locations where they could be directed (the signalized driveways on Beverly Boulevard, Fairfax Avenue and The Grove Drive). Further, the on-site audience parking areas would be accessible from all three signalized driveways.

The comment also assumes that each vehicle transaction would require 60 seconds at the security gate. While some transactions may require that length of time, the majority of transactions would be substantially quicker, as audience members would be pre-registered and the security check would merely need to match guests to a list. Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, including Table II-12 therein, which shows that the average processing time ranges from approximately 9 to 60 seconds per vehicle, with employee vehicles (i.e., the large majority of vehicles) being processed at 9 seconds per vehicle.

Refer to Topical Response No. 12, Safety and Congestion, for a detailed discussion and analysis of potential queuing at gates. It includes a Poisson analysis of morning peak hour queuing at The Grove Drive similar to that produced in the comment but with accurate data. It assumes arrival of 289 employee vehicles, 33 studio audience and visitor vehicles, and six trucks sharing two security lanes. The resulting 95th percentile queue would be three vehicles per lane, which would be accommodated within the proposed 160 feet of storage per lane. As demonstrated in Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, the non-CEQA queuing analysis in the Transportation Assessment accounted for all inbound Project trips, including audience trips, and correctly concluded that vehicular entrance gate locations and queuing areas are adequate.

Further, The Grove Drive driveway is proposed to have five total lanes, including two dedicated inbound lanes, two dedicated outbound lanes, and one lane that can be operated in either direction depending on traffic flows. Thus, in the event that studio

audience vehicles for multiple simultaneous shows were directed to the driveway on The Grove Drive, there would be sufficient capacity for security screening and space to accommodate this volume of audience vehicles. Finally, the Project would have the operational flexibility to direct or distribute studio audience vehicles as needed between various driveways in order to avoid the potential for queues onto public streets.

Therefore, the concerns expressed in the comment are unfounded and based on incorrect assumptions.

Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment No. 16-11 regarding pedestrian safety. Refer to Response to Comment No. 9-29 regarding the Project's less-than-significant impacts related to traffic hazards.

Comment No. 26-E.4-18

Hazards Caused by the Project at Off-Site Intersections Due to Incompatible Uses

The Project Site is located in a highly congested area and additional vehicular traffic generated by the Project would cause safety hazards as vehicles are expected to queue outside of available left-turn and right-turn pockets, which would be exacerbated by Project-related traffic. Due to the proposed uses and its substantial generation of vehicle trips, the hazards are directly related to the proposed Project, which have not been disclosed in the Draft EIR.

Beginning with the forecast of vehicle traffic at the off-site intersections evaluated in the Transportation Assessment, LLG identified the following errors which likely have caused an under-reporting of the relative hazards caused by the Project:

- Based on Tables 6 and 7 of the Transportation Assessment, a "pass-by" trip credit was incorporated into the trip generation forecast related to the 20,000 square feet of retail/restaurant use proposed on the Project Site. As the Project Site is surrounded by security gates and generally available only to employees and their guests, there will likely be no "impulse" trips to the on-site retail and restaurant uses. Thus, no pass-by trip reductions should apply.
- Trip generation related to the proposed Mobility Hub use, as well as other uses such as the basecamp and production support that is not included in floor area, etc. have not been included in Tables 6 and 7 of the Transportation Assessment.
- As previously stated, the trip generation forecast does not include vehicle trips generated by live audience tapings at the Project Site.

- The forecast of ambient traffic growth in the Transportation Assessment is only until year 2026 yet the Project proposes a Development Agreement with the City allowing development to occur over a 20-year period (page II-36 of the Draft EIR). Thus, background traffic should have been forecasted to a period 20 years beyond possible approvals (e.g., to 2043).

Even with the under-reported trip forecasts on the street network analyzed in the Transportation Assessment, the Project land uses are forecast to create or exacerbate potentially hazardous conditions at the intersections based on the data provided in Appendix G. Below is a sample of the potentially hazardous locations:

- Intersection No. 1, Fairfax Avenue/Melrose Avenue
- Southbound Left-Turn: The Project will increase the AM peak hour queue by 0.7 vehicles, resulting in a 168-foot queue. Assuming a 150-foot storage area, the queue will exceed the available storage area by 18 feet.
 - Southbound Left-turn: The Project will increase the PM peak hour queue by 1.9 vehicles, resulting in a 325-foot queue. Assuming a 150-foot storage area, the queue will exceed the available storage area by 175 feet. This queue will spill back into adjacent southbound travel lanes.
- Intersection No. 7, Fairfax Avenue/3rd Street
- Northbound Left-Turn: The Project will increase the AM peak hour queue by 0.3 vehicles, resulting in a 240-foot queue. Assuming a 150-foot storage area, the queue will exceed the available storage area by 90 feet. This queue will spill back into adjacent southbound travel lanes.
 - Northbound Left-Turn: The Project will increase the PM peak hour queue by 0.3 vehicle lengths, resulting in a 220-foot queue. Assuming a 150-foot storage area, the queue will exceed the available storage area by 70 feet. This queue will spill back into adjacent southbound travel lanes.
 - Southbound Left-Turn: The project will increase the PM peak hour queue by 1.1 vehicle lengths, resulting in a 415-foot queue. Assuming a 310-foot storage area, the queue will exceed the available storage area by 105 feet. This queue will spill back into adjacent travel lanes, and may interfere with the operations of the upstream signal (Fairfax Avenue/Farmers Market Place).
- Intersection No. 10, Fairfax Avenue/6th Street
 - Southbound Left-Turn: The Project will increase the AM peak hour queue by 0.2 vehicles, resulting in a 303-foot queue. Assuming a 200-foot storage area, the queue will exceed the available storage area by 103 feet. This

queue will spill back into adjacent travel lanes, and may interfere with access at upstream unsignalized intersections.

- Intersection No. 14, Stanley Avenue–The Grove Drive /Beverly Boulevard
 - Westbound Left-Turn: The Project will increase the PM peak hour queue by 1.1 vehicles, resulting in a 160-foot queue per lane. The resulting queue will exceed the available storage area by 80 feet. This queue will spill back into adjacent travel lanes and may interfere with the operations of the upstream signal (Curson Avenue/Beverly Boulevard).
- Intersection No. 20, La Brea Avenue/Beverly Boulevard.
- Northbound Left-Turn: The Project will increase the AM peak hour queue by 1.3 vehicles, resulting in a 213-foot queue. Assuming a 200-foot storage area, the queue will exceed the available storage area by 13 feet.
 - Southbound Left-Turn: The Project will increase the PM peak hour queue by 1.8 vehicles, resulting in a 385-foot queue. Assuming a 245-foot storage area, the queue will exceed the available storage area by 140 feet. This queue will spill back into adjacent travel lanes.

It is noted the Draft EIR fails to provide a vehicle queuing analysis at all the Project Site driveways, as well as for the intersection of The Grove Drive and private alleyway, which the Project proposes to use for vehicular access. Missing from the Transportation Assessment is vehicle queuing analysis/data for the following intersections:

- Project driveway on Fairfax Avenue south of First Street
- Project driveway on Beverly Boulevard west of Genesee Avenue
- Project driveway on Beverly Boulevard across from Spaulding Avenue
- The Grove Drive and Private Alleyway

The TAG (page 3-6) requires evaluation of vehicle queuing at “All primary project driveway(s)” and “Unsignalized intersections that are adjacent to the project or that are expected to be integral to the project’s site access and circulation plan.”

Additionally, the Transportation Assessment does not evaluate whether vehicle from adjacent signalized intersections may extend through the proposed Project driveways. For example, it is expected that vehicle queues on the eastbound Beverly Boulevard approach to the Stanley Avenue–The Grove Drive intersection will extend into and through the Spaulding Avenue-proposed Project driveway intersection, impeding traffic movements to

and from the driveway and creating new safety impacts. Without the queuing data provided at all the Project access locations, the potential safety impacts caused by the Project may not be fully disclosed in the Draft EIR.

It is noted that at the intersection of Spaulding Avenue and Beverly Boulevard, all traffic movements are currently permitted, including left-turns to and from Spaulding Avenue. The Project proposes that traffic movements to and from the proposed Project driveway on Beverly Boulevard be limited to rights-turns in and right-turns out only (e.g., as depicted on Figure 22, page 80 of the Transportation Assessment). However, the Transportation Assessment does not disclose how these turning movement restrictions will be enforced. Physical barriers on Beverly Boulevard are not possible because they would otherwise prohibit currently permitted traffic movements to and from Spaulding Avenue.

Response to Comment No. 26-E.4-18

Contrary to the comment, as concluded in the Initial Study (included in Appendix A of the Draft EIR), the Project would have a less-than-significant impact related to increased hazards due to a design feature or incompatible use, and no further analysis of this topic was required in the Draft EIR. Nonetheless, the Transportation Assessment included as Appendix M.1 of the Draft EIR provides a detailed discussion of Threshold T-3 in Section 4C (see pages 124-128 of the Transportation Assessment); refer to Response to Comment No. 9-29. The commenter attempts to create a safety hazard impact under CEQA by using incorrect assumptions and unsupported assertions in the non-CEQA queuing analysis presented in the Draft EIR.

The comment also makes a number of inaccurate claims about the Project trip generation estimates and transportation analysis. The following corrects those claims:

- A. The retail portion of the Project would be open to the public and not behind security gates as described in the comment. Therefore, the application of pass-by trip discounts is appropriate. Moreover, if it were behind security gates making it difficult for customers to access, it is reasonable to assume that it would get fewer customers and, thus, fewer trips.
- B. The trips associated with basecamp areas, production support space, and the Mobility Hub are accounted for in the transportation analysis. Refer to Topical Response No. 10, Trip Generation, for a more detailed explanation of the derivation of the trip generation estimates for the Project. Topical Response No. 10, provides a discussion on the validity of the empirical data used to estimate trip generation for production office, sound stage, and production support uses at the Project Site. This includes a comparison of actual driveway counts of existing trips at the Project Site to estimates using the empirical data.

Refer to Section D, Basecamp Trips, of Topical Response No. 10, Trip Generation, for a discussion of basecamp trips. As discussed in Response to Comment No. 26-160, the Mobility Hub would not generate trips; rather, it would reduce single-occupant vehicle trips to and from the Project Site and, thus, reduce VMT. The comment incorrectly states that there is production support that is not included as floor area. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate. Basecamp and outdoor production activity areas are related to and dependent upon sound stages; those areas do not separately generate production activity. As such, even though basecamp and outdoor production activities are not counted as floor area, these activities were fully accounted for in the Draft EIR's transportation analysis.

- C. The Project's trip generation estimates include trips associated with sound stage audiences. See Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a discussion of visitor and audience trips.
- D. As described in Response to Comment No. 26-159, projection of background traffic to Year 2043 would substantially overestimate future traffic conditions. The combination of related projects and a 1-percent assumed growth rate resulted in a 12.8-percent increase in background trips between existing traffic levels and Future 2026 Traffic without Project shown in Figure 21 (page 77) of the Transportation Assessment (Appendix M.1 of the Draft EIR). The SCAG 2040 travel demand model predicts a smaller traffic increase between years 2018 and 2040 than the Transportation Assessment assumed between years 2021 and 2026. Thus, an operational analysis using the SCAG 2040 base traffic levels would not have had substantially different results than the same analysis shown in the 2026 operational analysis in the Project Transportation Assessment.

The comment then repeats intersection queuing information and analyses presented in the Transportation Assessment included in Appendix M.1 of the Draft EIR. These analyses were provided as part of the non-CEQA transportation analysis in accordance with the TAG. This information has been reviewed by LADOT, and the Transportation System Management and Vision Zero improvements included in the Transportation Improvement Program (see Topical Response No. 15, Transportation Improvement Program) have been added to the improvement program to address potential queuing effects. In every example provided in the comment, the Project would add incrementally (and minimally by 0.2 to 1.9 vehicles) to queues already forecast to exceed turn pockets during peak hours; thus, the Project would not introduce new turn pocket exceedances or result in any queues that are considered to be safety hazards by the City's traffic experts, LADOT. The Transportation Assessment includes a comprehensive analysis of traffic hazards beginning on page 124. As concluded therein by LADOT and Gibson, the Project would not increase hazards due to geometric design features, including from safety,

operational or capacity effects (taking into account a number of compatibility factors, including, among others, the relative amount of pedestrian activity, visibility factors, physical conditions, roadway lanes, roadway utilization/capacity and permitted speeds).

Figure 22 of the Transportation Assessment (page 80) shows the minor volumes of inbound/outbound trips on the unsignalized Project driveways cited in the comment. Most of them only permit right-turns, and none of these locations are likely to result in queues that would affect the traffic along the public streets adjacent to the Project. LADOT reviewed these minor driveway volumes and determined that additional queuing studies were not required.

There is no intent to prohibit any of the existing movements into or out of Spaulding Avenue north of Beverly Boulevard. Right-turn in and out access is proposed for the unsignalized driveways on Beverly Boulevard. This restriction can be enforced through turn restriction signage since these vehicles will all be subject to Project Site access and security.

Comment No. 26-E.4-19

Threshold (d): Result in inadequate emergency access

The Draft EIR does not consider or disclose the Project's significant impacts to emergency access. Beverly Boulevard is a designated Disaster Route¹⁵ in Los Angeles County. Emergency access is particularly important in consideration that the Project Site is located on Beverly Boulevard and is only a mile away from Cedars-Sinai Medical Center. Cedars-Sinai's Emergency Department provides one of the few Level I Trauma Centers in Los Angeles County and its ambulance entry is located immediately south of Beverly Boulevard. As previously shown on *Figure 2*, even with the Draft EIR's understated trip generation forecast, the Project will add motorist delay, vehicle queuing, and overall congestion at a minimum of three LOS E/F intersections along the important Beverly Boulevard ambulance route, significantly increasing travel times for ambulances to access Cedars-Sinai, as well as adversely affecting response times for all emergency vehicles in the Project Site vicinity.

Other routes around the Project Site will experience significant impacts to emergency vehicle access. Again, using the Draft EIR's understated vehicle queuing analysis, the Project will add to an already existing northbound vehicle queue that consumes nearly two-thirds of the block of The Grove Drive between Beverly Boulevard and Third Street. There is no center left-turn lane for much of the block on The Grove Drive, so northbound emergency vehicles would need to drive in the oncoming southbound vehicle lanes in order to access Beverly Boulevard.

It is demonstrated herein that trucks will have great difficulty in turning to and from The Grove Drive at the Project's proposed new private street. Most trucks will need to stop in the middle of The Grove Drive and complete multiple back-and-forth maneuvers, thereby impeding movements by emergency vehicles.

Finally, as also demonstrated herein, extensive vehicle queues are expected at the Project's new private street at The Grove Drive related to the regular arrival of live audience tapings. In addition to adversely impacting movements by emergency vehicles on The Grove Drive, it will significantly impact emergency vehicle access to the Project Site.

¹⁵ <http://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Central%20Area.pdf>

Response to Comment No. 26-E.4-19

The Initial Study (Appendix A of the Draft EIR) included an analysis of emergency access and determined impacts would be less than significant. Emergency access is also analyzed in the Draft EIR on page IV.J.1-22 of Section IV.J.1, Public Services—Fire Protection, and page IV.J.2-14 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR. Refer also to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, which discusses emergency access along the streets in the vicinity of the Project. Topical Response No. 12 also includes a detailed analysis of inbound gate queuing at each driveway, including on The Grove Drive, showing that even considering studio audience visitors there would be no queuing on the public street. As described in Topical Response No. 12 and Response to Comment Nos. 9-29 and 16-36, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Truck maneuvers in and out of the Project driveway on The Grove Drive will not have to make multiple-point turns to access the Project Site. It should be noted that all trucks to and from the Project Site would head in and out of all designated access points, preventing time-consuming and disruptive back-in maneuvers, as exists with the loading operations of The Grove shopping center. Refer to Response to Comment No. 26-E.4-15 for further discussion regarding truck maneuvers and the lack of safety hazards. Therefore, this would not negatively affect emergency access.

Comment No. 26-E.4-20

Figures [11 pages]

Appendix A—M/M/S Queuing Model Output [3 pages]**Response to Comment No. 26-E.4-20**

This comment consists of modeling output information provided by the commenter. Responses related to this attachment have been included in the responses to comments above.

Comment No. 26-E.5-1**Exhibit 5—Tract Map 83387 [2 pages]****Response to Comment No. 26-E.5-1**

This comment consists of a tract map of the Project Site. Responses to this attachment have been included in the responses to comments above.

Comment No. 26-E.6-1**Exhibit 6—TVC 2050—Mid-City West Neighborhood Council Presentation, August 15, 2022 [74 pages]****Response to Comment No. 26-E.6-1**

This comment consists of a copy of the PowerPoint presentation to the Mid-City West Neighborhood Council with regard to the Project. This presentation was not a part of the Draft EIR. Relevant responses related to this attachment have been included in the responses to comments above.

Comment No. 26-E.7-1**Exhibit 7—TVC 2050—Cultural Heritage Commission Presentation, August 18, 2022 [28 pages]****Response to Comment No. 26-E.7-1**

This comment consists of a PowerPoint presentation to the Cultural Heritage Commission with regard to the Project. Relevant responses related to this attachment have been included in the responses to comments above.

Comment Letter No. 27

Michael S. Dea
Business Manager
LiUNA Local 1184
1128 E. La Cadena Dr.
Riverside, CA 92507-8695

Comment No. 27-1

On behalf of LiUNA! Local 1184, our nion [sic] enthusiastically supports TVC 2050: The Los Angeles Studio Plan.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying constructions jobs. Televison [sic] City has agreed to employ union constructon [sic] workers for the project which means new job opportunieis [sic] for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 27-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 28

Allan J. Abshez
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Loeb & Loeb LLP
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Comment No. 28-1

We are writing on behalf of our client, the A.F. Gilmore Company, to provide comments to the Draft Environmental Impact Report (DEIR) for the TVC 2050 Specific Plan and associated actions (collectively, the “Project”).

In light of the numerous fundamental defects of the DEIR identified in this letter it appears that the lead agency has not complied with the plain mandate of Public Resources Code Section 21082.1. Specifically, and as further discussed in this letter, it appears that the lead agency has not independently reviewed or analyzed the plans, reports, and declarations submitted by the Developer and its consulting team with even the most basic critical eye as required by CEQA and the Los Angeles Municipal Code. This in turn supports the conclusion that the DEIR, in whole or part, does not reflect the independent judgment of the lead agency, and that the Developer has improperly been allowed to use the CEQA process as its own mouthpiece.

Response to Comment No. 28-1

This introductory comment incorrectly claims that the Draft EIR does not comply with Public Resources Code (PRC) Section 21082.1, which relates to lead agency review, without providing any evidence or support. The Draft EIR is a City of Los Angeles document, prepared by independent professionals with extensive coordination and independent review and approval by the Department of City Planning.

Comment No. 28-2

The Project is characterized as a “Specific Plan to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities.” However, no Specific Plan has been provided for public review. The following questions must be answered:

- 1) Has the lead agency prepared, received, reviewed, and or analyzed the Specific Plan?

- 2) If the lead agency has received and reviewed the Specific Plan, why was it not released to the public at the same time as the publication of the DEIR so that the public could review and comment?
- 3) If the lead agency has not received and reviewed the Specific Plan, how did the lead agency verify the representations made by the DEIR regarding the Specific Plan so that those representations may be said to be accurate and reflect the City's independent judgment?

Response to Comment No. 28-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 regarding the proposed Specific Plan, the fact that CEQA and City policy do not require the aSpecific Plan to be included in the Draft or Final EIR, and how the physical aspects of the proposed Specific Plan are consistent with those in Section II, Project Description, of the Draft EIR. Refer also to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. The comparison presented therein confirms that the physical elements were discussed and analyzed in the Draft EIR. An initial draft of the Specific Plan that was provided by the Applicant has been publicly available since 2021 and is part of the administrative record. Although not required by CEQA or City policy, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment No. 28-3

The DEIR fails to provide an accurate, stable and finite description of the Project; thus failing CEQA's most basic requirement. *County of Inyo v. City of Los Angeles*, (1977) 71 Cal.App.3d 185,193. Accordingly, the DEIR is fundamentally defective. Since the Project is "a Specific Plan" and not an actual development proposal, the public must be afforded an opportunity to review the proposed Specific Plan together with the new or recirculated DEIR that contains an environmental impact analysis of the actual Specific Plan. What does the Developer actually intend to build and operate? There is no way of determining this with any certainty from the DEIR despite its thousands of pages.

The DEIR's Project Description Chapter uses the word "conceptual" repeatedly in caveating that the Project presented in the DEIR is not actually the project that may be developed. A "Conceptual" Site Plan is provided as Figure II-4 of the DEIR But—

- At page II-13, the DEIR states that the "Conceptual Site Plan" illustrates only "one possible development scenario that could be developed..." "The specific mix of uses ultimately constructed will depend on market demands..." **Actual**

development would be governed by the requirements of the proposed Specific Plan and not the conceptual site plan... (emphasis added);

- At page II-15, the DEIR states that the buildings depicted in the Conceptual Site Plan illustrate one possible buildout scenario—not an actually proposed project;
- At page II-20, the DEIR states that the DEIR’s “height zones” and buildings shown in the Conceptual Site Plan do not represent actual development footprints;
- At page II-26, the DEIR states that only “some” internal circulation routes are depicted on the Conceptual Site Plan;
- At page II-9, the DEIR states that mobility hub depicted is only “Conceptual”; and
- At page II-30, the DEIR states that the Conceptual Site Plan illustration of parking location is only “Conceptual” and that parking could be located anywhere on the Project site.

The lack of a Specific Plan for public review as part of the DEIR, together with the uncertainty as to what will actually be built and operated, how what actually is built and operated will actually be accessed by vehicles and public transportation, how what actually is built and operated will actually be served by internal circulation, and where parking actually will be built to serve what is actually built results in what the Inyo court describes as “[a] curtailed, enigmatic or unstable project description [that] draws a red herring across the path of public input.” *Id.* at pp. 197, 198. Thus, the DEIR is fundamentally defective.

We note that the Director of Planning’s April 16, 2021 consent to the initiation of the proposed plan amendment was conditioned on “**finalization of the site plan** and project description to be analyzed in the Environmental Impact Report.” (emphasis added) However, as discussed above, there is no final site plan. Why has the Planning Department allowed the preparation of an Environmental Impact Report despite the fact that the Developer has not provided a final site plan which the Director’s April 16, 2021 required as part of the Director’s consent to initiate the general plan amendment? The failure to require the Developer to comply with the conditions of the Director of Planning’s consent indicates that the lead agency is not exercising proper oversight over the Developer’s proposal.

Response to Comment No. 28-3

The Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 of the Draft EIR). Any substantial changes from the Project that was analyzed in the EIR, including proposals that include a land use exchange, would be subject to further discretionary review and CEQA compliance per the

Preliminary Draft Specific Plan. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-11, and 26-5 regarding how the Project Description provided in Section II, Project Description, of the Draft EIR is accurate, stable, and finite and a draft Specific Plan was not required to be included as part of the EIR. Also refer to Topical Response No. 1 and Response to Comment Nos. 5-5, 9-12, and 9-13 regarding the Conceptual Site Plan, the conceptual nature of all site plans in an EIR, and the level of detail required for analysis within a draft EIR for a specific plan project. Refer to Topical Response No. 1 and Response to Comment Nos. 9-13 and 26-16 regarding the mix of uses. Refer to Response to Comment Nos. 9-16 and 26-7 regarding the established height zones. With regard to the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. With regard to locations of parking, refer to Topical Response No. 13, Parking, and Response to Comment No. 9-2.

Regarding internal circulation routes, the commenter does not provide the full sentence on page II-26 of the Draft EIR, which states: "While some of the circulation routes are depicted in the conceptual site plan, some would be partially subterranean and/or internal to the new buildings, thus providing internal connectivity between production spaces and supporting uses." See Figure II-4 on page II-14 of the Draft EIR, which shows the Conceptual Site Plan, including the internal circulation system within the Project Site. Due to their subterranean nature and/or integration with buildings, the grade level Conceptual Site Plan does not depict all of the internal site circulation. Refer to Figure IV.K-3 on page IV.K-43 of the Draft EIR, which further depicts vehicular Project Site access at the grade level.

Note that the commenter misconstrues the intent of the comment provided in the General Plan Amendment Initiation Request Form dated April 16, 2021. Prior to the initiation of the General Plan Amendment, the Director of Planning's designee requested refinement of building massing and building placement near the existing HCM located on-site. In accordance with the direction of the Department of City Planning, these refinements were incorporated into the application materials. The Conceptual Site Plan included in the Draft EIR reflects these refinements. As discussed in Topical Response No. 1, the massing and locations of the proposed buildings is depicted on the Conceptual

Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*.

Contrary to this comment, the City has exercised proper oversight over the Applicant's proposal since the time the application was filed.

Comment No. 28-4

The lead agency's failure to provide an accurate, stable, finite project description is more than a CEQA failure; it is a failure by the lead agency to comply with the requirements of the City's Municipal Code. The Project Description states that "a Vesting Zone Change from the existing C1.5-2D-O and C2-1-O zones to the TVC 2050 Specific Plan Zone (TVC zone), and to assign the TVC zone to an approximately 0.63-acre portion of the Project Site located in unincorporated Los Angeles County to be annexed to the City of Los Angeles" is required to implement the Project. However, LAMC Section 12.32.Q.3(a) provides that "in all vesting zone change cases a site plan and a rendering of the architectural plan of the building envelope **shall be submitted**. The plans and renderings shall show the proposed project's height, design, size and square footage, number of units, the use and location of buildings, driveways, internal vehicular circulation patterns, loading areas and docks, location of landscaped areas, walls and fences, pedestrian and vehicular entrances, location of public rights-of-way and any other information deemed necessary by the Director of Planning.in [sic] connection with a vesting zone change." (emphasis added)

The Developer's "Conceptual" plan approach is not permitted by LAMC Section 12.32.Q.3(a), which requires specific and definite plans with respect to all required items. Accordingly, the Developer's application for a Vesting Zone Change should have been, and should be, deemed incomplete, and CEQA review (which may only begin after an application and all required information is properly deemed complete) should be terminated.

Compliance with the informational requirements of LAMC Section 12.32.Q.3(a) is not only necessary for bureaucratic purposes, but also to facilitate meaningful public participation by informing the public about what exactly is proposed to be built and proposed to be vested,¹ as well as to enable the conduct of meaningful CEQA review. Why did the Planning Department accept the Developer's applications when the plain requirements of LAMC Section 12.32.Q.3(a) have not been supplied? How can the Planning Department support the "vesting" of a project, when no specific project is actually proposed? All of the information required by LAMC Section 12.32.Q.3(a) must be supplied and included in a recirculated DEIR if the Developer continues its proposal.

Similarly, the Developer has requested a Vesting Tract Map. However, under the City's subdivision ordinance, and in accordance with the Advisory Agency's long-standing practice, an applicant for a Vesting Tract Map must depict building envelopes, showing the height of the buildings, their size, number of units, the location of buildings, their driveways and exterior garden walls. A certified parking plan is also required. The DEIR states that the "Conceptual Site Plan" does not represent the Developer's plan for development. The Developer has not provided the location of any buildings, any building height, any building size, the location of any driveway or parking areas as required by the City's subdivision ordinance. Accordingly, the Developer's application for a Vesting Tract Map should have been, and should be, deemed incomplete, and CEQA review (which may only begin after an application and all required information is properly deemed complete) should be terminated.

Compliance with the informational requirements of the City's subdivision ordinance is not only necessary for bureaucratic purposes, but also to facilitate meaningful public participation by informing the public about what exactly is proposed to be built and proposed to be vested,² as well as to enable the conduct of meaningful CEQA review. Why did the Advisory Agency accept the Developer's applications for a Vesting Tract Map when the plain requirements of the City's subdivision ordinance and Advisory Agency practice have not been met. How can the Advisory Agency support the "vesting" of a project, when no specific project is actually proposed? All of the information required by the City's subdivision ordinance must be supplied and included in a recirculated DEIR if the Developer continues its proposal.

These failures again support the conclusion that the lead agency is not exercising proper oversight over the Developer's proposal, and that the DEIR, in whole or part, does not reflect the independent judgment of the lead agency, which has improperly allowed the Developer to use the CEQA process as its own mouthpiece.

- ¹ "Vesting" against changes in planning and zoning rules is a special privilege, requiring the submission of more detailed information than a non-vested application for entitlements.
- ² "Vesting" against changes in planning and zoning rules is a special privilege, requiring the submission of more detailed information than a non-vested application for entitlements.

Response to Comment No. 28-4

Refer to Response to Comment No. 32-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the timing of environmental review under CEQA.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section

15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Contrary to the commenter's assertion, the Project has been submitted and processed in accordance with all applicable LAMC regulations. The commenter is correct that the Project has sought vesting rights; however, the commenter has incorrectly analyzed the method in which the Project has secured vesting rights. On May 13, 2021, the Applicant filed a request for multiple legislative approvals and a subdivision approval with the Department of City Planning. On June 3, 2021, the Department of City Planning completed its review of the application materials and issued a "Deemed Complete" letter finding that the case file "contain[ed] sufficient information to satisfy the processing of the requested entitlements...." Refer to the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*.

The Project also applied for a Vesting Tentative Tract Map. In accordance with Section 12.36 C.5 of the LAMC, "if a project requiring multiple approvals also requires a Subdivision Approval by the Advisory Agency, that Subdivision Approval and any appeals shall be decided and governed by the rules set forth in Article 7 of Chapter 1 of this Code." Article 7 of Chapter 1 of the LAMC incorporates what the commenter referred to as the City's subdivision ordinance. Within Article 7 of Chapter 1 of the LAMC, Section 17.15 B.1(a) outlines the process for preparing, submitting, and processing Vesting Tentative Tract Maps, stating that "a subdivider shall provide all information required in connection with the filing of a tentative map by this Code, including the information required by LAMC Section 17.06 B and C."

Furthermore, "where the proposed subdivision is in a designated Hillside area, the Advisory Agency shall require the filing of a proposed grading plan pursuant to Section 17.05 L and may not waive the requirement to file preliminary soils report pursuant to Section 17.05 U. A subdivider shall also indicate whether the proposed subdivision is in the vicinity of the Mulholland Scenic Parkway and the dedication of land for such purposes may be necessary. In addition, if design review of the proposed subdivision is required by the applicable community or district plan or by a specific plan, the subdivider shall provide the information necessary for such review. The plan of building envelope shall be submitted, showing the height, size, number of units and approximate location of buildings, driveways and any proposed exterior garden walls."

Contrary to the commenter's assertion, the requirements in the preceding paragraph do not apply to the Project. The Project is not in a Hillside Area, not in the vicinity of the Mullholland Scenic Parkway, and not within an existing specific plan, Design Review Board, or other special zoning overlay, and is not a Small Lot Subdivision. Therefore, none of the additional requirements for preparation and submittal of a VTTM beyond the base

requirements for tentative maps are applicable. Thus, the Project needs to only comply with the information required by the LAMC, including Sections 17.06 B and C. The Project fully complies with the tentative map requirements of Sections 17.06 B and C of the LAMC because the VTTM submitted includes all 16 technical requirements for preparation of tentative maps and because no protected tree or shrub is planted on-site or in the adjoining right-of-way of the Project Site. All of the information that meets these 16 requirements is consistent with the Conceptual Site Plan analyzed in the Draft EIR. The commenter has not provided any information to substantiate that the Project is noncompliant with the applicable code sections analyzed above. Vague commentary about “longstanding practices” of the Advisory Agency does not constitute noncompliance with the LAMC. The Project’s VTTM has been vested since its filing with the Department of City Planning on May 13, 2021.

The Project has also requested a Vesting Zone Change to designate the entirety of the Project Site, including an approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County to be annexed to the City of Los Angeles, to the TVC Zone. Section 12.32 Q of the LAMC lists the code requirements for applications requesting approval of a vesting zone change. As restated by the commenter, the requirements for a vesting zone change application include plans containing information on the proposed height, design, size and square footage, number of units (not applicable), the use and location of buildings, driveways, internal vehicular circulation patterns, loading areas and docks, location of landscaped areas, walls and fences, pedestrian and vehicular entrances, and location of public rights-of-way. Although the commenter has restated the requirements of Section 12.32 Q of the LAMC, the commenter has not identified any specific deficiency in the Project application to demonstrate noncompliance with Section 12.32 Q of the LAMC. The application for the Project and Vesting Zone Change contained information that satisfied the requirements for application of for a vesting zone change and that information is consistent with the Conceptual Site Plan analyzed in the Draft EIR. Further, it should be noted that all applications submitted to any City agency for entitlements or permits are inherently conceptual until approved. Characterization of an exhibit as a “concept” by an applicant does not constitute noncompliance with applicable LAMC regulations.

The Project’s multiple legislative actions and subdivision of land requests are subject to the Multiple Approvals Ordinance codified in Section 12.36 of the LAMC. As described herein, the Project has been properly submitted, reviewed, and processed by the City pursuant to the Multiple Approvals Ordinance, and all requested entitlements will be set for public hearing concurrently in the future. Finally, the Project’s application is vested as a result of compliance with LAMC requirements governing vesting rights of tentative maps and zone changes, and the application is vested in whole pursuant to Section 12.36 G.3 of the LAMC. Contrary to this comment, the City has exercised proper oversight over the Applicant’s proposal since the time the application was filed.

Comment No. 28-5

From the DEIR's description, the public cannot understand whether the Developer is proposing to develop a closed-campus movie and television studio, like the 20th Century Fox campus, or whether the Developer is merely seeking to increase and 'bank' commercial development rights of various types for speculative future use. The uncertain and unnecessarily long time frame for development and such statements as "the specific mix of uses ultimately constructed will depend on market demands..." and the "[a]ctual development would be governed by the requirements of the proposed Specific Plan and not the conceptual site plan..." prevents the public from understanding the Developer's actual intentions. This raises the following questions, which must be answered:

- 1) What "market demands" would permit the Developer to construct something other than what is depicted in the Conceptual Site Plan?
- 2) What are the "requirements" of the proposed Specific Plan that would govern development, and where may they may [sic] be reviewed by the public?

At page II-12 of the DEIR, the Project Description states that "[u]nder the Specific Plan, **portions** of the Project Site would be redeveloped with new studio-related uses, circulation improvements, parking facilities, landscaping, and open space." (emphasis added) This indicates that portions of the Project site will not be redeveloped with new studio-related uses. This raises the following questions, which must be answered:

- 1) Where does the DEIR analyze and disclose the environmental impacts of the Project, if it is not developed as depicted in Figure II-4?
- 2) Which portions of the Project Site would be redeveloped with other than new studio- related uses? What specifically would be developed in those portions of the Project Site?
- 2) [sic] Is there a phasing plan for the Project?
- 3) Is the Developer committed to building any additional studios and sound stages? If so, how many? Where is this commitment found, if anywhere?
- 4) Is the Developer committed to develop the entire structured "base camp" level of the Project shown in the Conceptual Site Plan as phase one of the Project?
- 5) If not, what is the phasing plan for the "base camp"?
- 6) Will the structured "base camp" level of the Project be developed before any new studio or office square footage is occupied?

- 7) Is it possible the structured “base camp” level will not be developed in whole or part?
- 8) Where does the DEIR describe the environmental impacts of the Project, if the structured “base camp” level is not developed as depicted in the Conceptual Site Plan?
- 9) Does the proposed Specific Plan allow the Developer to develop, lease and or operate “general office” and/or retail space that is not part of a closed-campus movie and television studio?
- 10) Will the mobility hub be built and opened before any new studio or office square footage is occupied?
- 11) What is the difference between Production Office and General Office?
- 12) How will the lead agency assure that Production Office is not utilized by the Developer as General Office?³

³ In this regard, that General Office generates more than twice the peak hour trips than Production Office.

Response to Comment No. 28-5

Regarding Items 1 and 2 on the commenter’s first list, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-12 regarding the Conceptual Site Plan and the proposed Specific Plan, how the physical aspects of the proposed Specific Plan were fully disclosed and analyzed in the EIR, and the regulations and procedures under the proposed Specific Plan. With regard to the mix of uses and market demands, refer to Response to Comment Nos. 9-12 and 26-16.

With respect to Items 1, 8, and 12 on the commenter’s second list, the entirety of the Draft EIR analyzes the proposed development program as defined Section II, Project Description, of the Draft EIR.

The comment regarding “portions of the Project Site would be redeveloped” (i.e., Item 2 on the commenter’s second list) is misconstruing the information in the Draft EIR. The use of the word “portions” is intended to account for the fact that the Project Site includes the Primary Studio Complex, an HCM that would be retained as part of the Project, as discussed throughout the Draft EIR.

Regarding the duplicate Item 2 and Items 4, 5, 6, 7, and 10 on the commenter’s second list, there is no specific phasing plan for construction of the Project components, including the basecamp area. Refer to Response to Comment Nos. 5-12 and 9-24

regarding the Project timeframe. Refer to Topical Response No. 7, Mobility Hub, regarding the timing of the Mobility Hub.

Regarding Item 9 on the commenter's second list, all Project uses have been analyzed irrespective of ownership and/or operations. The potential impacts associated with all uses have been studied and discussed throughout the Draft EIR.

Regarding the difference between production office and general office uses (i.e., Item 11 on the commenter's second list), refer to Response to Comment Nos. 26-14 and 26-122 that explain these uses and discuss the definitions of the permitted uses in the proposed Specific Plan. The approval of the Specific Plan would ensure that, consistent with the Project as described in the Draft EIR, production office and general office would be limited to a maximum of 700,000 square feet of floor area each. Refer to Response to Comment Nos. 5-6, 5-15 and 9-13 regarding the underlying purpose of the Project to continue the use of the Project Site as an operating studio. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five permitted studio uses.

Comment No. 28-6

Compounding all of this unacceptable uncertainty, is the uncertainty of what uses will actually occur at the Project Site. At page IV.H-20, the DEIR states that "[t]he types of land uses and facilities permitted on-site would be set forth in the Specific Plan. These would **include** such uses as motion picture, television, and broadcast studios and related uses..." (emphasis added). From this description, it is evident that uses other than motion picture, television, and broadcast studios and related uses may be allowed and are envisioned by the Developer.

Moreover, the list of related uses provided at pages IV.H-20-21 fails in terms of basic informational disclosure. For example,

- Special events? What type? How frequent? How large? How many include the sale of alcoholic beverages?
- Audience and entertainment shows? What is the difference between the two types of shows? How many and how frequent would each be? How large? Are audience and entertainment shows considered in the Project's traffic and parking analysis? Where is the analysis of these items in the DEIR?
- Museum exhibits and theaters? What kind of museum? How large? Would it be open to the public? What kind of theaters? How many? How large? Would they be open to the public?

- Manufacturing? What kind of manufacturing? What types of materials will be used? What kind of emissions will result?
- Medical Offices (including emergency medical facilities)? How many? How large? Why would medical offices other than emergency offices be included in a studio project? Would medical offices be open to the general public?
- “All other uses permitted in the C2 zone unless expressly prohibited in the Specific Plan”? We note that no Specific Plan has been provided to the public, so that the public is unable to understand what other uses permitted by the C2 zone would be allowed. Where does the DEIR analyze “all other uses permitted in the C2 zone?” Please revise the DEIR to provide an environmental impact analysis of “all other uses permitted in the C2 zone.”

All of these questions (and related questions regarding the random use list provided in the DEIR must be answered), and environmental impact analysis of all of the uses must be supplied in a revised and recirculated DEIR. Through its uncertainties and its vacillating descriptions, the DEIR subjects the public to a veritable ‘shell game’ that is not permitted by CEQA, which again underlines the fact that the lead agency is not exercising critical oversight of the Project and the DEIR as required by Public Resources Code Section 21082.1.

Response to Comment No. 28-6

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment Nos. 5-6, 5-15, and 9-13 regarding the underlying purpose of the Project to continue the use of the Project Site as an operating studio, the clarified list of permitted uses proposed as part of the Project, and special events. Contrary to this comment, the Draft EIR has been prepared in full compliance with CEQA.

Refer to Topical Response No. 8, Vehicle Miles Traveled, and Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding how audience shows (which could include audience entertainment or experience shows) were accounted for in the trip generation estimates and VMT calculations in the Draft EIR. As discussed in detail in Topical Response No. 10, the studio audience trips are inherent in the empirical trip generation rates that were used in the Transportation Assessment (Appendix M.1 of the Draft EIR) to estimate Project trips. Moreover, audience trips represent a small percentage of the overall total gross daily trip generation. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project.

Theaters, displays, and exhibitions in connection with production activities would be permitted under the sound stage use. Other than retail uses and audience shows, the permitted uses would not generally be open to the public.

Set/façade manufacturing associated with production activities would be permitted under the production support use; refer to the Preliminary Draft Specific Plan and page II-16 of the Draft EIR. As discussed in Response to Comment Nos. 26-E.1-27 and 26-E.1-28, emissions associated with on-site activities associated with operation of the Project, including, but not limited to, the use of emergency generators and paint spray booths, are fully accounted for in the Project's estimated air quality emissions. These estimated emissions are presented in Tables IV.A-7 and IV.A-10 of Section IV.A, Air Quality, of the Draft EIR.

As discussed in Response to Comment No. 28-5 and Topical Response No. 3, Permitted On-Site Uses, the Specific Plan would permit production office and general office uses. As stated on page II-16 of the Draft EIR, emergency medical facilities to serve the on-site employees and visitors would be permitted. These uses would not be open to the public.

Based on the comments received on the Draft EIR, and as discussed in Topical Response No. 3, Permitted On-Site Uses, the permitted uses were clarified to reflect the Project's studio objectives, including, among other things, removing the C2 zone text referenced in this comment (even though C2 uses are currently permitted); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-7

Compounding the failure to comply with LAMC Section 12.32.Q.3(a) and the City's subdivision ordinance, the lack of a Specific Plan, the uncertainty as to what will actually be built, the uncertainty of uses that are to be permitted, and the limited analysis of the DEIR to the 'Conceptual Plan,' is the failure to include the proposed development agreement as part of the DEIR. The development agreement is not a discretionary approval necessary for the Project. Rather, it requests a special privilege: a 20-year vested right to develop the Project Site free of potential changes in planning and zoning requirements, and free of regulations that may be adopted to protect the public and the environment after the development agreement is approved. Without an understanding of what this right entails, and what protections—if any—are included to protect against environmental impacts not

disclosed in the DEIR, the public cannot intelligently participate in the CEQA process and evaluate the environmental impacts of granting the Developer a 20-year vested right to exercise the “unknown” rights of an “undisclosed” Specific Plan. This raises the following questions, which must be answered:

- 1) Has the Planning Department prepared, received, reviewed, and/or analyzed the proposed Development Agreement?
- 2) Why has the proposed Development Agreement not been released to the public in conjunction with the publication of the DEIR?
- 3) What rights would the proposed Development Agreement grant to the Developer?
- 4) What is the proposed consideration for the City entering into the proposed Development Agreement?
- 5) Does the proposed Development Agreement reflect the lead agency’s independent judgment?

Response to Comment No. 28-7

Refer to Response to Comment Nos. 28-2 through 28-4 regarding the Specific Plan and Project Description.

Refer to Response to Comment No. 9-24 regarding the Development Agreement. The component of the proposed Development Agreement that is relevant to the environmental analysis under CEQA is its 20-year term, which could extend vesting of entitlements for 20 years and related buildout of the Project to approximately 2043. The Draft EIR conservatively assumes a 32-month construction duration that includes overlapping activities and construction phases and more intense activities on a daily basis. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. For further information, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Please note that the Development Agreement would only allow for development consistent with the Project described in the certified EIR. Other provisions of the Development Agreement would be contractual issues between the City and the Applicant, which do not constitute physical impacts on the environment. A draft Development Agreement will be made publicly available on the Department of City Planning’s website prior to hearings for the Project.

Comment No. 28-8

Compounding the foregoing uncertainties, it is apparent that the City has not reviewed the Developer's plans with a critical eye in order to establish the actual square footage of the Project for environmental analysis purposes. Specifically, the Developer has excluded—and the lead agency has improperly allowed the Developer to exclude—from CEQA analysis the area of so-called “base camp” from the Project's floor area even though the Municipal Code requires that such area be included in analysis and regulation of the Project, and even though the Developer's own information discloses that such area will be actively used as studio space and production support space.



The foregoing illustration produced by the Developer shows “base camp” area (observe the truck parked in the background) being utilized for a photo-shoot of a Rolls Royce automobile outside of a stage area.



The foregoing illustration produced by the Developer shows “base camp” area being used for assembly and meetings, among other things.

The requirements of CEQA analysis cannot be avoided by the lead agency by engaging in “definitional” games. The fact that the lead agency has issued a DEIR which does not analyze the environmental impacts of all of the Project’s operational floor area again reinforces the conclusion that the DEIR, in whole or part, does not reflect the independent judgment of the lead agency, which has improperly allowed the Developer to use the CEQA process as its own mouthpiece.

The DEIR is fundamentally misleading and defective for its failure to include all of the area of the so-called “base camp” in DEIR’s environmental impact analysis. Although the DEIR fails to provide detailed Project plans depicting all of the area constituting “base camp,” we conservatively estimate that such area comprises at least 360,000 square feet, if not more. Because “base camp” areas plainly are actively operated areas, the lead agency must treat all of such area as “floor area” as defined the Los Angeles Municipal Code, accurately quantify the amount of such area (supported by plans made available to the public in the DEIR), disclose the amount of such floor area to the public, revise the environmental impact analysis of the Project so that it analyzes all of the Project, and recirculate the DEIR for public review.

Response to Comment No. 28-8

The Draft EIR was prepared by the Los Angeles Department of City Planning, as Lead Agency, in accordance with CEQA and the CEQA Guidelines. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

This comment is similar to Comment No. 26-16, and the renderings in this comment are included in Comment No. 26-16; as such, refer to Response to Comment No. 26-16 for further discussion of the renderings. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 26-121 regarding why basecamp areas are not considered floor area and how basecamp activities were included in the impact analyses throughout the EIR. Also refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for the graphics depicting the existing and proposed basecamp areas, which is consistent with the architectural plans that were submitted as part of the Project's application. As stated in the Draft EIR, the Project would include a net increase of approximately 194,600 square feet of basecamp areas within the Project Site.

As discussed in Response to Comment No. 26-16, basecamp is a subset of production activities, which has been clarified in the Final EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The first rendering included in this comment depicts an outdoor production activity area at Project Grade, which includes active filming, as well as basecamp activities. As shown in Figure II-4(c) of Section III, Revisions, Clarifications, and Corrections to the Draft EIR, this area is located at Project Grade outside of the existing sound stages in the Primary Studio Complex. The second rendering depicts typical basecamp uses as discussed in Section II, Project Description, of the Draft EIR, and does not depict "assembly and meetings" as suggested by the commenter.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-9

The DEIR is fundamentally defective for its failure to identify, analyze and disclose the Project's conflict with the Housing Crisis Act of 2019 (SB 330, codified in part as Government Code Section 66300, the "Housing Crisis Act"), which prohibits an Affected City, such as the City of Los Angeles, from changing the general plan land use designation, specific plan land use designation, or zoning of a parcel of parcels [sic] of property where

housing is an allowable use to a less intensive use that would lessen the intensity of housing permitted on the parcel or parcels of property.

The Project violates the Housing Crisis Act by entirely eliminating housing where it is currently allowed by the City's General Plan and by the C2 Zone and the C1.5 Zone which apply to all of the Project Site within the City of Los Angeles.⁴ The C2 Zone permits multi-family housing at a density of one dwelling unit per 400 square feet of lot area. The C1.5 Zone also permits multi-family housing at a density of one dwelling unit per 400 square feet of lot area. Furthermore, in addition to eliminating housing as a permitted use, the Project proposes a 20-year development agreement which would prohibit the City from re-planning or re-zoning the Project Site to allow, or require, housing to be developed.

Moreover, the permitted intensity of the Project Site for housing is greater than one dwelling unit per 400 square feet of lot area because the entirety of the Project Site is eligible for density bonus, not only pursuant to Government Code 65915 (and the City's implementing ordinances), but also pursuant to Ordinance No. 184,745 (implementing Measure JJJ, known as the "Build Better LA Initiative"), which is implemented by the City's Transit Oriented Communities (TOC) Affordable Housing Incentive Program. Under the TOC Affordable Housing Incentive Program the Project Site is designated for Tier 2 and Tier 3 density bonus. Areas of the Project Site designated Tier 2 are eligible for a 60% density bonus for projects containing the required percentage of affordable housing. Areas of the Project Site designated Tier 3 are eligible for a 70% density bonus for projects containing the required percentage of affordable housing.

The Housing Crisis Act contains no exemption for projects, such as the proposed Project, that purport to "contribute to Los Angeles' status as a global creative capital..." Rather, the legislature has declared that (i) there is a statewide housing emergency, to be in effect until January 1, 2025; (ii) "California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over the next 7 years;" and (iii) "reusing existing infrastructure and developed properties, and building more smaller homes with good access to schools, parks and services, will provide the most immediate help with the lowest greenhouse gas footprint to state residents."

In this regard, Section 66300(i)(I) provides that "[t]his section does not prohibit an affected county or an affected city from changing a land use designation or zoning ordinance to a less intensive use if the city or county **concurrently** changes the development standards, policies, and conditions applicable to **other parcels** within the jurisdiction to ensure that there is **no net loss in residential capacity**." (emphasis added) However, the Project does not propose, and the DEIR does not identify, "other parcels" within the City of Los Angeles that would be concurrently up-zoned to offset the residential capacity lost if the

Project is approved. Approval of the Project as proposed would plainly violate the Housing Crisis Act.

It should be noted that the Housing Crisis Act concerns a matter of statewide concern and prevails over any conflicting law. Moreover, the legislature has declared that the Housing Crisis Act shall “be broadly construed so as to maximize the development of housing within this state. Any exception to the requirements of this section, including an exception for the health and safety of occupants of a housing development project, shall be construed narrowly.”

- ⁴ The DEIR repeatedly states that no residential uses are proposed as part of the Project, and no residential uses are analyzed as part of the Project by the DEIR.

Response to Comment No. 28-9

The commenter refers to the Housing Crisis Act enacted by the California Legislature in 2019, commonly known as SB 330, which is codified in various sections of the California Government Code. As stated in the Legislative Counsel’s Digest of this legislation, SB 330 imposes new requirements concerning “housing development projects,” which is defined as projects that include residential uses for at least two-thirds of the square footage of the project.¹¹⁹ (Government Code Section 65589.5(h)(2).) The Project does not propose to develop any residential uses.

Government Code Section 66300(b) also prohibits a local agency from changing the “general plan land use designation, specific plan land use designation, or zoning of a parcel or parcels of property to a less intensive use,” with the term “less intensive use” being defined as changing a land use regulation or development standard that “that would lessen the intensity of housing.” The proposed Specific Plan for the Project would not lessen the intensity of housing on the Project Site. Currently there is no housing on the Project Site. Refer to Response to Comment No. 16-2 with regard to the allowable residential density and required process for future potential environmental review and discretionary approval outlined in the Specific Plan.

Refer to Response to Comment No. 16-53 regarding Measure JJJ.

¹¹⁹ Senate Bill 330, Housing Crisis Act of 2019, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB330, accessed August 23, 2023.

Comment No. 28-10

CEQA requires that an environmental impact report identify a project's conflict with plans, policies, or regulations adopted for the purpose of avoiding environmental impacts. The Housing Crisis Act is also a plan, policy or regulation adopted for the purpose of avoiding environmental impacts. As the legislature has declared:

- “The lack of housing, including emergency shelters, is a critical problem that threatens the economic, **environmental**, and social quality of life in California.” Government Code Section 65589.S(a)(I)(A).
- “California housing has become the most expensive in the nation. The excessive cost of the state's housing supply is partially caused by activities and policies of many local governments that limit the approval of housing, increase the cost of land for housing, and require that high fees and exactions be paid by producers of housing.” Government Code Section 65589.S(a)(I)(B).
- “Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, **imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.**” Government Code Section 65589.S(a)(I)(C).
- “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and **homelessness, and undermining the state's environmental and climate objectives.**” Government Code Section 65589.5(a)(2)(A).
- “An additional consequence of the state's cumulative housing shortage is a significant increase in **greenhouse gas emissions** caused by the displacement and redirection of populations to states with greater housing opportunities, particularly working- and middle-class households. California's cumulative housing shortfall therefore has not only national but **international environmental consequences.**” Government Code Section 65589.5(a)(2)(I).

The DEIR is fundamentally defective and basically inadequate for its failure to identify, disclose and analyze the Project's conflict with the Housing Crisis Act as a significant and unavoidable land use impact. The DEIR is further fundamentally and basically inadequate for failing to identify, disclose and quantify the loss of housing capacity (including, but not limited to the loss of housing capacity in accordance with TOC density bonus applicable to the Project Site). The DEIR is further fundamentally and basically inadequate for its failure to identify, disclose and analyze the indirect environmental effects of the Project's approval

in violation of the Housing Crisis Act would cause, including but not limited to, homelessness and its environmental impacts, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration. The DEIR must be revised and recirculated to address these issues as required by CEQA.

Response to Comment No. 28-10

As discussed in Response to Comment No. 28-9, the Project is not in conflict with the Housing Crisis Act because the Project would not result in a loss of housing capacity under the proposed zoning and land use designations as compared to existing conditions. Further, the commenter should note that although the Housing Crisis Act is intended to address the lack of a sufficient Statewide housing supply, the Housing Crisis Act also does not force every current and future development project to be comprised of housing units. As discussed in Section II, Project Description, of the Draft EIR, the Project is the creation of a specific plan to permit the continuation of an existing studio use and the modernization and expansion of media production facilities within the Project Site.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-11

The DEIR concedes that the Wilshire Community Plan was adopted for the purposes of avoiding or mitigating environmental impacts, but fails to provide an adequate discussion of the Community Plan, particularly in light of the Developer’s proposal to change the general plan designations of the Project Site from Community Commercial, Neighborhood Commercial and Limited Commercial to Regional Commercial, as well as the Project’s elimination of critically needed housing capacity at the Project Site in violation of the Housing Crisis Act.

The DEIR is fundamentally deficient and misleading for representing that the Project is “Consistent” with Community Plan Policy 16-1.1., which provides in relevant part “[t]o the extent feasible... maintain a satisfactory Level of Service (LOS)... above LOS “D” for Avenues and Collector Streets.” This Community Plan Policy was not changed by the adoption of Senate Bill 743, but remains an adopted core policy of the Wilshire Community Plan. Beverly Blvd., Fairfax Avenue, and 3rd Street are designated as Avenue II, and La Brea Avenue is designated as an Avenue I in Mobility Plan 2035, and The Grove Drive is designated as a “Collector” street. This leads to the following questions, which must be answered:

- 1) What is the current Level of Service for each of the intersections within the Study Area along Beverly Blvd.?
- 2) What is the projected cumulative Level of Service for each intersection within the Study Area along Beverly Boulevard with the Project completed?
- 3) With the development and operation of the Project and cumulative traffic, will a satisfactory Level of Service above LOS “D” be maintained at each intersection along Beverly Boulevard within the Study Area?
- 4) At which intersections along Beverly Boulevard within the Study Area will a satisfactory Level of Service above LOS “D” not be maintained?
- 5) Is the Project consistent with Policy 16-1.1 as to each intersection along Beverly Boulevard within the Study Area?
- 6) Which intersections along Beverly Boulevard within the Study Area will be inconsistent with Policy 16-1.1 with the development and operation of the Project and cumulative traffic?
- 7) Does LADOT concur that the Project is Consistent with Policy 16-1.1 with respect to intersections along Beverly Boulevard within the Study Area? Please provide LADOT’s statement on this question.
- 8) What is the current Level of Service for each of the intersections within the Study Area along 3rd Street?
- 9) What is the projected cumulative Level of Service for each intersection within the Study Area along 3rd Street with the Project completed?
- 10) With the development and operation of the Project and cumulative traffic, will a satisfactory Level of Service above LOS “D” be maintained at each intersection along 3rd Street within the Study Area?
- 11) At which intersections along 3rd Street within the Study Area will a satisfactory Level of Service above LOS “D” not be maintained?
- 12) Is the Project consistent with Policy 16-1.1 as to each intersection along 3rd Street within the Study Area?
- 13) Which intersections along 3rd Street within the Study Area will be inconsistent with Policy 16-1.1 with the development and operation of the Project and cumulative traffic?

- 14) Does LADOT concur that the Project is Consistent with Policy 16-1.1 with respect to intersections along 3rd Street within the Study Area? Please provide LADOT's statement on this question.
- 15) What is the current Level of Service for each of the intersections within the Study Area along Fairfax Avenue?
- 16) What is the projected cumulative Level of Service for each intersection within the Study Area along Fairfax Avenue with the Project completed?
- 17) With the development and operation of the Project and cumulative traffic, will a satisfactory Level of Service above LOS "D" be maintained at each intersection along Fairfax Avenue within the Study Area?
- 18) At which intersections along Fairfax Avenue within the Study Area will a satisfactory Level of Service above LOS "D" not be maintained?
- 19) Is the Project consistent with Policy 16-1.1 as to each intersection along Fairfax Avenue within the Study Area?
- 20) Which intersections along Fairfax Avenue within the Study Area will be inconsistent with Policy 16-1.1 with the development and operation of the Project and cumulative traffic?
- 21) Does LADOT concur that the Project is Consistent with Policy 16-1.1 with respect to intersections along Fairfax Avenue within the Study Area? Please provide LADOT's statement on this question.
- 22) What is the current Level of Service for each of the intersections within the Study Area along Grove Drive?
- 23) What is the projected cumulative Level of Service for each intersection within the Study Area along Grove Drive with the Project completed?
- 24) With the development and operation of the Project and cumulative traffic, will a satisfactory Level of Service above LOS "D" be maintained at each intersection along Grove Drive within the Study Area?
- 25) At which intersections along Grove Drive within the Study Area will a satisfactory Level of Service above LOS "D" not be maintained?
- 26) Is the Project consistent with Policy 16-1.1 as to each intersection along Grove Drive within the Study Area?

- 27) Which intersections along Grove Drive within the Study Area will be inconsistent with Policy 16-1.1 with the development and operation of the Project and cumulative traffic?
- 28) Does LADOT concur that the Project is Consistent with Policy 16-1.1 with respect to intersections along Grove Drive within the Study Area? Please provide LADOT's statement on this question.

Response to Comment No. 28-11

The comment states that the Draft EIR fails to provide an adequate discussion of the Wilshire Community Plan. The Wilshire Community Plan and the land use designations for the Project Site are discussed on page IV.H-8 in Section IV.H, Land Use and Planning, of the Draft EIR. The Project's consistency with the applicable goals, objectives, and policies in the Wilshire Community Plan adopted for the purpose of avoiding or mitigating an environmental impact is discussed on pages IV.H-44 to IV.H-45 of the Draft EIR. To support that discussion, a detailed list of the goals, objectives, and policies of the Wilshire Community Plan applicable to the Project is provided in Table 2 of Appendix I of the Draft EIR, along with an analysis of the Project's consistency with each particular goal, objective, or policy. As stated on page IV.H-17 of the Draft EIR, under State Planning and Zoning Law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. Per OPR's State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall intent but need not be in perfect conformity with every plan policy. As discussed in Section IV.H, Land Use and Planning, and Appendix I of the Draft EIR, the Project would not conflict with the objectives and policies that support the goals of the Wilshire Community Plan.

Refer to Response to Comment Nos. 5-8 and 11-29 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the proposed Regional Commercial designation, and Response to Comment No. 28-9 regarding housing and the Housing Crisis Act.

As discussed on page IV.K-1 in Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, changes in driver delay are not considered to be transportation impacts under CEQA, and "conflicts" with LOS policies under the Wilshire Community Plan are not significant transportation impacts under CEQA. Refer to Response to Comment No. 26-E.4-8 regarding the Project's consistency with Wilshire Community Plan Policy

16-1.1. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

In response to Question Nos. 1 through 4, 8 through 11, 15 through 18, and 22 through 25 asking for specific LOS conditions for intersections in the Study Area, see Table 17 on page 160 and Table 18 on page 162 of the Transportation Assessment. As shown in Table 18, a total of six intersections were found to operate at LOS E or F during one or both peak hours *with or without the completion of the Project*. These include:

- Intersection #5, Fairfax Avenue & Beverly Boulevard
- Intersection #7, Fairfax Avenue & 3rd Street
- Intersection #10, Fairfax Avenue & 6th Street
- Intersection #11, Fairfax Avenue & Wilshire Boulevard
- Intersection #14, Stanley Avenue / The Grove Drive & Beverly Boulevard
- Intersection #20, La Brea Avenue & Beverly Boulevard.

The Project would not worsen the LOS at any of these intersections under Future with Project Conditions compared to Future without Project Conditions.

In response to Question Nos. 5, 6, 12, 13, 19, 20, 26, and 27 asking whether the Project is consistent with Policy 16-1.1 as to each intersection in the Study Area, see page IV.K-64 in Section IV.K, Transportation, of the Draft EIR. Policy 16-1.1 states “to the extent feasible” to maintain a satisfactory LOS D operating conditions along Boulevards, Avenues, and Collector Streets. The Project would not cause any location to change from LOS D or better to LOS E or F during either peak hour under 2026 conditions. The Project would also implement a comprehensive TDM Program that would further reduce Project-related trips, which was not accounted for in the operational LOS evaluation. Therefore, the Project does not conflict with Policy 16-1.1.

Finally, in response to Question Nos. 7, 14, 21, and 28 asking whether LADOT concurs with the Project’s consistency with Policy 16-1.1, as stated in LADOT’s Assessment Letter provided in Appendix M.2 of the Draft EIR, LADOT has reviewed the non-CEQA operational evaluation and determined that it adequately discloses operational effects. Thus, the Transportation Assessment included in Appendix M.1 of the Draft EIR fully evaluated and disclosed the non-CEQA operating conditions of the street system in accordance with the TAG.

Comment No. 28-12

The Project Transportation Study area has been improperly constrained. The Project would take primary freeway access to and from the 10 Freeway from Fairfax Avenue at Venice Blvd., which is within the Wilshire Community Plan. Fairfax Avenue between Venice Blvd. and Pico Blvd. is primarily a single-family and multiple-family residential neighborhood. Fairfax Avenue and Wilshire Blvd. is projected to operate at LOS F with the Project and cumulative traffic. LOS F equates to “FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.” Yet the Transportation Study Area inexplicably fails to analyze the Project’s impacts upon Fairfax south of Wilshire Boulevard. The failure to include intersections along Fairfax Avenue between Wilshire Boulevard and the boundary of the Wilshire Community Plan is particularly egregious because this segment of Fairfax Avenue is commonly known as a notorious traffic ‘bottleneck’ that is severely impacted by gridlock traffic during business hours on weekdays and on weekends. Beyond delay, this gridlock condition affects the physical environment in numerous ways (including noise and air quality), quality of life, pedestrian and vehicular safety. The DEIR’s failure to analyze the Project’s impacts on this segment of Fairfax Avenue deprives the public of critical information and understates the environmental impacts of the Project. Will the Project’s 18-wheel trucks be using Fairfax to travel to and from the Project Site from the freeway? If so, how will they impact Fairfax Avenue. If not, what route will they use to travel to and from the freeway from the Project Site? The Project’s impact on this segment of Fairfax Avenue will also contribute to increased cut-through traffic, which is already a problem that impacts the community surrounding Fairfax Avenue, which impact must be analyzed in a revised and recirculated DEIR analysis. The DEIR should be revised and recirculated to provide an analysis of the Project’s environmental effects on Fairfax Avenue intersections between Wilshire Blvd. and the boundary of the Wilshire Community Plan where Fairfax provides access to the 10 Freeway. The DEIR’s analysis should address consistency with the Wilshire Community Plan’s policies, and indirect environmental effects on the community on and adjacent to Fairfax Avenue in the expanded Transportation Study area.

Response to Comment No. 28-12

The comment claims that the Project’s Transportation Assessment included in Appendix M.1 of the Draft EIR should have conducted analysis further south on Fairfax Avenue. However, the CEQA transportation analysis is based on VMT. As stated above in Response to Comment No. 28-11, vehicle delay and LOS are not environmental impacts under CEQA following the passage of SB 743. Similarly, cut-through traffic is not considered an environmental impact under CEQA. Therefore, the comment claiming that the Draft EIR must be recirculated to include such analysis has no basis in CEQA. Regardless, the Transportation Assessment includes both analyses as part of its non-CEQA analysis. Refer to Section B, Level of Service, of Topical Response No. 12,

Safety and Congestion, and Response to Comment Nos. 9-29, 16-36, and 26-E.4-8 regarding the non-CEQA LOS analysis. Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12 regarding queuing. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips.

Refer to Response to Comment No. 26-156 regarding the Study Area analyzed in the Transportation Assessment. Specifically, the Transportation Assessment complied with City requirements identified in the TAG. The TAG requires analysis of automobile delay and LOS outside of the CEQA process at locations around the Project Site, including intersections where the Project would add 100 or more net new peak hour trips (page 3-7 of the TAG). The intersection Study Area analyzed in the Transportation Assessment—consisting of 31 intersections shown in Figure 6 of the Transportation Assessment—included the intersection of Fairfax Avenue and Wilshire Boulevard, located approximately 0.8 mile south of the Project Site. Figure 21 of the Transportation Assessment shows Project-only peak hour trips at each study intersection. As shown based on Intersection #11 (Fairfax Avenue and Wilshire Boulevard), during the morning peak hour, the Project is estimated to add approximately 41 trips south of Wilshire Boulevard (32 northbound and 9 southbound), and, during the afternoon peak hour, the Project is estimated to add approximately 45 trips south of Wilshire Boulevard (12 northbound and 33 southbound). This is less than half of and does not meet the 100-trip threshold identified in the TAG for the analysis of additional locations. Further, it can be expected that a portion of those trips on Fairfax Avenue south of Wilshire Boulevard use San Vicente Boulevard, located approximately 0.35 mile south of Wilshire Boulevard, and, thus, would not travel through the stretch of Fairfax Avenue between Venice Boulevard and Pico Boulevard (beginning approximately 1.6 miles south of the Project Site) referenced in the comment. As a result, Project trips on Fairfax Avenue south of Wilshire Boulevard are well under the City's threshold for the required non-CEQA analysis.

Other types of potential CEQA impacts, such as noise and air quality, are subject to different criteria for the determination of study areas, unrelated to the geographic extent of traffic analysis required by the City. Refer to Sections IV.A, Air Quality, and IV.I, Noise, of the Draft EIR for discussions of air quality and noise impacts, respectively.

As discussed in Section E, Truck Trips, of Topical Response No. 10, Trip Generation, daily truck trip generation is estimated to be approximately 166 trips, which is slightly over 1 percent of the total daily Project trip generation. Some of these trucks may travel on Fairfax Avenue south of Wilshire Boulevard. Project consistency with the Wilshire Community Plan's policies and objectives was discussed beginning on page IV.K-57 in Section IV.K, Transportation, of the Draft EIR and the Project was found to not be in conflict with the Wilshire Community Plan; refer to Response to Comment No. 26-165. The majority of the key transportation-related policies and objectives in the Wilshire Community

Plan deal with promoting transit and multi-modal mobility. Refer to Topical Response No. 7, Mobility Hub, and Topical Response No. 11, Transportation Demand Management, for details on the features and measures the Project is taking to reduce vehicular travel to and from the Project Site.

Comment No. 28-13

Has Council District 10 been consulted as to the potential impacts of the Project on the community adjacent to Fairfax Avenue within the 10th Council District? Has Council District 10 provided comments to the DEIR? Please share the input of the 10th Council District regarding these issues.

Response to Comment No. 28-13

The Project Site is not located in Council District 10 but was located in Council District 4 prior to 2021 redistricting of the City of Los Angeles and is now located in Council District 5. Accordingly, the Applicant has consulted with both Council District 4 and Council District 5. Moreover, as part of the Applicant's community outreach throughout the life of the Project, the Applicant has briefed State and local elected officials, including Council District 10, and has also conducted over two years of direct engagement with local residents, community stakeholders. This includes over 100 community meetings, presentations, and open house events (in addition to the many small group meetings with neighboring homeowners and property owners), over 100 local businesses and over 20,000 residents canvassed within a one-mile radius of the Project Site, and over 50,000 Project brochures mailed to local residents.

Comment No. 28-14

Given that La Brea Avenue provides the only alternative access to the 10 Freeway aside from Fairfax Avenue, and that 40% of trip distribution is forecast to come from the east and southeast, why was only one La Brea intersection included in the Study Area? The DEIR should be revised and recirculated to provide an analysis of the Project's environmental effects on La Brea Avenue intersections between Beverly Blvd. and the boundary of the Wilshire Community Plan to the south proximate to the 10 Freeway. The DEIR's analysis should address consistency with the Wilshire Community Plan's policies, and indirect environmental effects on the community on and adjacent to La Brea Avenue in the expanded Transportation Study area.

Response to Comment No. 28-14

The comment claims that additional intersections should have been analyzed on La Brea Avenue. The Project's non-CEQA analysis, presented in the Transportation Assessment included as Appendix M.1 of the Draft EIR, fully analyzed the surrounding

street system in accordance with LADOT's non-CEQA analysis requirements. As discussed in Response to Comment Nos. 26-156 and 28-12, the TAG requires analysis of the intersections where the Project would add 100 or more net new peak hour trips. The Project-only peak hour traffic volumes are shown in Figure 21 of the Transportation Assessment. Based on the volumes shown at Intersection #20, La Brea Avenue and Beverly Boulevard, only approximately 16 morning peak hour and 21 afternoon peak hour trips would travel on La Brea Avenue south of Beverly Boulevard. An additional approximately 60 morning peak hour and 68 afternoon peak hour trips would travel on 3rd Street east of the intersection of Martel Avenue and Hauser Boulevard (see Intersection #28), a portion of which can be assumed to use La Bea Avenue. However, even if all of those trips used La Brea Avenue, there would still be well under 100 peak hour Project trips on La Brea Avenue south of Beverly Boulevard. Therefore, the Study Area analyzed in the Transportation Assessment is consistent with the TAG. Accordingly, the Draft EIR does not have to be recirculated as incorrectly stated in the comment. Refer to Response to Comment No. 9-4 regarding recirculation.

Project consistency with the Wilshire Community Plan's policies and objectives was discussed beginning on page IV.K-57 of the Draft EIR and Response to Comment Nos. 26-165 and 28-12.

Comment No. 28-15

Has Council District 10 been consulted as to the potential impacts of the Project on the community adjacent to La Brea Avenue within the 10th Council District? Has Council District 10 provided comments to the DEIR? Please share the input of the 10th Council District regarding these issues.

Response to Comment No. 28-15

This comment is identical to Comment No. 28-13. Refer to Response to Comment No. 28-13.

Comment No. 28-16

In light of the deficiencies of the DEIR's transportation impact analysis and the foregoing questions, the DEIR improperly concludes that the Project is "Consistent" with Policy 16-2.1 of the Community Plan, which provides:

"No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, unless the Decision-makers make the following findings or a statement of overriding considerations: The transportation infrastructure serving the project site and surrounding area,

presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.”

Indeed, how did the lead agency reach a conclusion of “Consistency” before the Decision-makers have made any of the findings required by Policy 16-2.1?

Response to Comment No. 28-16

Refer to Response to Comment No. 16-18 regarding the Project’s consistency with Wilshire Community Plan Policy 16-2.1. As described in the Draft EIR, the Specific Plan would allow up to a maximum of 1,874,000 square feet of floor area within the Project Site. As discussed in Section IV.K, Transportation, of the Draft EIR, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project’s CEQA transportation-related analysis and resulting impacts are assessed via the VMT methodology. As stated above in Response to Comment No. 28-11, LOS methodology is no longer applicable for the purposes of identifying a project’s CEQA transportation-related impacts. Notwithstanding, upon the Project’s anticipated completion in 2026, several intersections on arterial streets would operate at LOS E or F, both before and after the addition of Project trips. The Project would not cause any location to change from LOS D or better to LOS E or F during morning or afternoon peak hours. The Project would provide pedestrian enhancements around the Project Site, including landscaping, sidewalk and crosswalk improvements, and bus stop improvements. Bus stops would be upgraded along Fairfax Avenue and Beverly Boulevard to include adequate benches, shelters, lighting, LED displays, and signage to the extent feasible under the City of Los Angeles’ current bus shelter contract. The Project would also provide first-mile/last-mile services at the Mobility Hub, which includes Project shuttles to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction. The potential effectiveness of the shuttle bus to the Metro D (Purple) Line subway station is discussed in Section A, TDM Effects on Trip Generation, in Topical Response No. 11, Transportation Demand Management. The Mobility Hub would also support future shuttle services to provide a connection to existing and/or future transit stations (e.g., the Metro B (Red) Line or Crenshaw North Extension). Additionally, the Project’s TDM Program would encourage travel via alternative transportation modes and reduce single-occupancy vehicle trips. Furthermore, the Applicant would contribute toward signal improvements at nearby intersections and the implementation of bicycle improvements within the Study Area. Lastly, the Project would be fully reviewed by City departments, the Planning Commission, and City Council prior to a decision being made. Thus, the Draft EIR correctly concluded that the Project would not conflict with Policy 16-2.1.

Comment No. 28-17

The Draft EIR's transportation assessment concedes that the Project will subject several residential streets of the north and west of the Project to "excessive traffic burden" due to cut-through traffic caused by the Project. However, the DEIR provides no substantial evidence for limiting its assessment of cut-through traffic to the very few residential streets considered in the transportation assessment. Fairfax/Beverly is projected to operate at LOSE with Future Project conditions, 3rd/Fairfax is projected to operate at LOS FIE, and La Brea/Beverly is projected to operate at LOS FIE. According to LADOT, LOSE equates to "POOR. Represents the most vehicles intersection approaches can accommodate; **may be long lines of waiting vehicles through several signal cycles.**" According to LADOT, LOS F equates to "FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. **Tremendous delays with continuously increasing queue lengths.**" Given this unacceptable level of congestion, the following additional streets present attractive cut-through routes and should be evaluated for cut-through impacts (both north and south of Beverly Drive):

- Curson Avenue
- Sierra Bonita Avenue
- Gardener Street
- Vista Street
- Fuller Avenue
- Poinsettia Place
- Alta Vista Blvd.
- Formosa Avenue
- Detroit Street

Response to Comment No. 28-17

A project's effect on automobile delay, including cut-through trips, is not a CEQA issue following the passage of SB 743 and, therefore, cannot constitute a significant environmental impact. Nonetheless, a residential street cut-through analysis is included as part of the Transportation Assessment's non-CEQA transportation analysis. Specifically, Section 5C (pages 167 to 173) of Appendix M.1, Transportation Assessment, of the Draft EIR summarizes the residential street cut-through analysis for the Project, which includes a description of the basis for the selection of specific residential street segments to evaluate.

Refer to Sections B, Cut-Through Effects on Adjacent Neighborhoods, and C, Boundaries of the NTMP Areas, of Topical Response No. 9, Neighborhood Traffic Management Plan, for additional discussion of the street segment selection and the boundaries of the neighborhoods addressed in the analysis. As stated therein, although not required under CEQA, the Project would fund the implementation of an NTMP in order to minimize potential residential cut-through trips generated by the Project in accordance with the TAG.

In addition, as described in Response to Comment No. 10-1, the cut-through analysis included the streets that have the potential to experience a level of cut-through traffic that rises to the City's non-CEQA thresholds for requiring an NTMP. This included five streets north of Beverly Boulevard and east of Fairfax Avenue. Additional streets farther to the east, including those mentioned in the comment, may sporadically carry a small number of additional trips as a result of the Project, but none would approach the City's minimum threshold of 120 cut-through trips per day (which is over 1 percent of the Project's net increase of approximately 9,733 daily trips as shown in Table 13 of the Transportation Assessment).

Comment No. 28-18

Cut-through traffic affects the quality of life and the physical environment in residential neighborhoods. It also affects vehicular and pedestrian safety. Yet, despite LADOT's conclusion that the Project cut-through traffic will cause "excessive traffic burden" to several of the very few streets that have been analyzed for cut-through traffic to date, the DEIR concludes that the Project is "Consistent" with Guidelines 1 and 2 of the Citywide Design Guidelines:

- "Design projects to be safe and accessible and contribute to a better public right-of-way for people of all ages, genders, and abilities, especially the most vulnerable—children, seniors, and people with disabilities."
- "Design to avoid pedestrian and vehicular conflicts and to create an inviting and comfortable public right-of-way. A pleasant and welcoming public realm reinforces walkability and improves the quality of life for users."

Given LADOT's own conclusions as to the "excessive traffic burden" to residential streets adjacent to the Project that have been analyzed where "the most vulnerable—children, seniors and people with disabilities" actually live and play (and putting aside the additional residential streets that should be analyzed for cut-through traffic as discussed above), the DEIR's nearsighted conclusions are especially embarrassing.

No specific improvements are identified to protect the streets that the DEIR concedes will be impacted by "excessive traffic burden." CEQA does not permit the analysis and

recommendation of mitigation measures necessary to mitigate project impacts to be deferred until after project approval. Moreover, the transportation assessment recognizes that potential improvements may not be implemented at all, as well as that—even if they are implemented—potential improvements to one impacted street may merely divert the “excessive traffic burden” to other residential streets. However, the DEIR fails to analyze or disclose the residential streets that would be impacted by such diversion.

The DEIR should be revised and recirculated to analyze and disclose all of the residential streets that may be impacted by cut-through “excessive traffic burden,” and recognize that the cut-through traffic resulting from the Project will result in significant and adverse land use impacts (i.e., conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects). The DEIR should also discuss that “excessive traffic burden” to residential streets may foreseeably lead to indirect impacts of disinvestment, decay and degradation of the physical environment of impacted residential streets. See Bakersfield Citizens for Local Control v. City of Bakersfield 124 CA4th 1184 (2004) (“Case law already has established that in appropriate circumstances CEQA requires urban decay or deterioration to be considered as an indirect effect of a proposed project.”)

Response to Comment No. 28-18

The Project’s potential to conflict with the Citywide Design Guidelines is fully analyzed in Section IV.H, Land Use and Planning, of the Draft EIR. Refer to pages IV.H-45 through IV.H-55 of the Draft EIR. As an initial matter, consistency with the Citywide Design Guidelines has to do with the design of the Project and, in particular, how the physical Project Site integrates with the immediately surrounding public realm. The Project would improve the public realm through widened sidewalks (on Fairfax Avenue and The Grove Drive), enhanced landscaping on all frontages, and improved pedestrian activation with implementation of up to 20,000 square feet of retail space. Refer to Response to Comment No. 16-72 regarding the Project’s public realm enhancements and pedestrian-oriented design. Additionally, as described on page IV.K-71 of the Draft EIR, the Project would include upgraded crosswalks and bus stops and integrated first-mile/last-mile improvements, including the Mobility Hub, to help encourage non-vehicular travel to and from the Project Site, thus aligning with pedestrian-first principals. Thus, as concluded in Section IV.H, Land Use and Planning, of the Draft EIR, the Project would not conflict with the Citywide Design Guidelines, including Guidelines 1 and 2. As discussed in Response to Comment No. 26-165, the Draft EIR correctly concluded that the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects, and impacts would be less than significant.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment

(Appendix M.1 of the Draft EIR). As discussed therein, cut-through effects are not environmental impacts under CEQA. The comment includes several incorrect claims about “conclusions” reached by the LADOT, such as that the Project cut-through traffic will cause “excessive traffic burden” to several of streets that were analyzed for cut-through traffic, and the Project’s “excessive traffic burden” to residential streets adjacent to the Project would occur “where ‘the most vulnerable—children, seniors and people with disabilities’ actually live and play.” LADOT reached no such conclusions. Within the Assessment Letter issued by the LADOT for the Project’s Transportation Assessment, as presented in Appendix M.2 of the Draft EIR, LADOT acknowledged that the transportation analysis included examination of specific residential streets that could be used as a cut-through route to avoid arterial congestion and concluded that preparation and implementation of a neighborhood traffic management plan, as funded by the applicant, is needed to address the potential effects. Although not required under CEQA to mitigate a significant transportation impact, the Project would fund the implementation of an NTMP in order to minimize potential residential cut-through trips generated by the Project in accordance with the TAG. Refer to Sections A, Deferred Mitigation, and B, Cut-Through Effects on Adjacent Neighborhoods, of Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the development process for the NTMP to minimize the Project’s potential effects related to cut-through trips on residential streets.

Refer to Topical Response No. 12, Safety and Congestion, regarding pedestrian and vehicular safety.

Please note that “quality of life” is not an impact category under CEQA. In addition, the commenter fails to provide any evidence of potential disinvestment, decay, and degradation of the physical environment associated directly or indirectly with the Project’s transportation impacts, which are less than significant, or with respect to potential residential cut-through trips. Nevertheless, this comment will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

The Project’s transportation Impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR, in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, recirculation is not required, as incorrectly stated in this comment. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-19

The DEIR must also be revised and recirculated to analyze and disclose the historic resource impacts of the Project’s cut-through “excessive traffic burden” to the residential streets located in the Beverly Fairfax National Historic District, as well as the potential cut-through “excessive traffic burden” impacts to the potential Orange Grove Avenue-Gardner

Street Multi- Family Residential Historic District (found eligible for listing in the National Register in SurveyLA) and the Miracle Mile North Historic Preservation Overlay Zone.

Response to Comment No. 28-19

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the effects of cut-through trips, including cut-through trips within the Beverly Fairfax Historic District. In addition, as discussed in Response to Comment No. 26-E.2-38, the Miracle Mile North HPOZ was not included in the Project Site vicinity because the Project would have no potential to directly or indirectly impact this historical resource. The western boundary of the Miracle Mile North HPOZ sits more than 800 feet from the easternmost edge of the Project Site and cannot be reasonably considered to be part of its environmental setting under CEQA, nor is there any potential for the Project to result in significant impacts to the Miracle Mile North HPOZ.

The commenter implies that the Beverly Fairfax Historic District and the Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District are two different historical resources. The Beverly Fairfax Historic District includes most of the Orange Grove-Gardner Historic District. Based upon a closer investigation, however, the boundaries were adjusted to exclude some areas and add other areas. Refer to Figure II-15 and Figure II-16 on pages II-1201 and II-1202, which show the boundary of these districts.

As discussed in Response to Comment No. 26-E.2-10, this comment also fails to provide an explanation as to how increased trips through the Beverly Fairfax Historic District might translate to physical demolition, destruction, relocation, or alteration such that the significance of the Beverly Fairfax Historic District would be materially impaired, which is the threshold for significant impacts on historical resources per Appendix G of the CEQA Guidelines. While the transportation analysis makes clear that a potential result of the Project, which would include an NTMP and would not result in significant transportation impacts under CEQA, is more vehicle trips within the Beverly Fairfax Historic District, no evidence has been identified to suggest that a potential increase of vehicle trips will result in the demolition or material alteration of the physical characteristics of the Beverly Fairfax Historic District that convey its historic significance and that justify its inclusion in, or eligibility for, listing as a historical resource as defined by CEQA.¹²⁰ Therefore, a potential increase in vehicle trips would not result in significant impacts to the Beverly Fairfax Historic District.

¹²⁰ The NTMP is discussed in Topical Response No. 9.



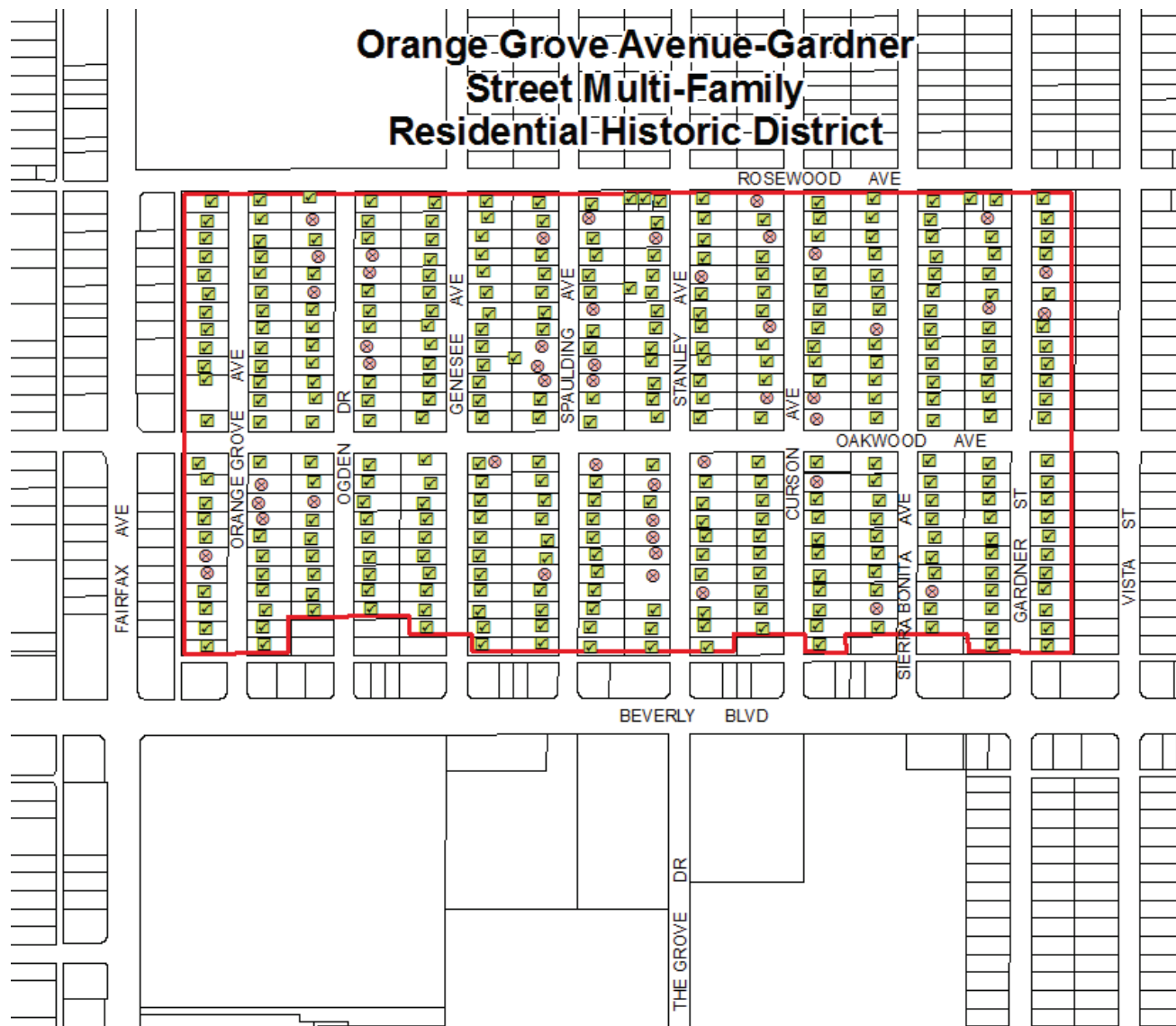


Figure II-16

Boundary of Orange Grove Avenue-Gardner Street
Multi-Family Residential Historic District

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-20

The DEIR’s land use analysis is fundamentally deficient for failing to disclose and discuss the fact that the Wilshire Community Plan is severely out of date. The land use analysis is also fundamentally defective for failing to discuss the Project’s inconsistency with Executive Directive No. 19 issued by Mayor Garcetti on March 9, 2017 to correct the deficiency of the City’s out of date community plans, and to make the City’s “planning process more efficient, effective, fairer and transparent...” The land use analysis of the DEIR must be revised and recirculated to discuss Executive Directive No. 19 and the lack of Project consistency with it.

According to the City Planning Department, an update of the Wilshire Community Plan was to be undertaken 2019–2021. According to the City Planning Department, updated Community Plans are intended to reflect the following environmental and planning objectives:

- Integrate land use, infrastructure, and transportation improvement;
- Direct growth to centers while preserving established residential neighborhoods;
- Create healthier, more livable neighborhoods and economically vital business districts that can provide more job and housing opportunities for city residents; and
- Facilitate improved design of new and renovated structures and public spaces.

Please explain how processing the Project, including but not limited to its proposal to redesignate Beverly Fairfax as a “Regional Center,” apart from an update to Wilshire Community Plan is consistent with each of these objectives?

What is the status of the update process? We note that there is no plan for an actual project that would be developed by the Developer within any time frame. Rather, there is only “Conceptual Site Plan” (which the DEIR states will not govern the development of the Project), and the Developer’s request for “vested rights” to develop the Project Site with an unknown project as many as 20 years into the future. In April 2018, the City Council found that “Amendments to Community Plans may at times need to be considered in the course of reviewing proposed developments. **However, such considerations should take place within the parameters of an identified Community Plan update process framework.**”

(emphasis added) Why is the Planning Department facilitating the Developer's proposed amendment to the General Plan when it is inconsistent with the City Council's adopted 2018 directive to the Planning Department?

The Wilshire Community Plan provides:

"In the fifth year following plan adoption (and every five years thereafter), the Director of Planning shall report to the commission on the relationship between population, employment, housing growth and plan capacities. If growth has occurred faster than projected, a revised environmental impact analysis will be prepared and appropriate changes recommended to the community plan. These plan and zoning changes shall be submitted to the Planning Commission, Mayor and City Council as specified in the Los Angeles Municipal Code."

Is the Director of Planning in compliance with this requirement of the Wilshire Community Plan? Please include all of the five-year reports required by the Wilshire Community Plan to be prepared by the Director of Planning in a revised and recirculated DEIR.

We also note that the Director of Planning's April 16, 2021 consent to initiation of the Project plan amendment stated that initiation of the amendment is "within the **absolute discretion of the Director of Planning** and, if initiated, to ensure a comprehensive review of the request and to avoid discordant planned land use, the Director may initiate additional properties ("added areas") within the immediate area for a similar General plan Amendment... " Given the severely out of date Wilshire Community Plan, the Council's 2018 directive, the lack of an actual project plan or timetable for construction, and the significant impacts of the Developer's request, please provide an explanation as to why the Director of Planning should not exercise his "absolute discretion" to place a hold on the Developer's request until an update to the Wilshire Community Plan is conducted?

The Developer is proposing that the Project Site, which is currently designated Neighborhood Commercial, Community Commercial and Limited Commercial be redesignated as a "Regional Center" in the City's General Plan. Regional Center is the most intense commercial designation provided by the General Plan. Does the Planning Department agree that Beverly Fairfax is the appropriate location for Regional Center Development?

Response to Comment No. 28-20

Refer to Topical Response No. 6, Wilshire Community Plan Update. As discussed therein, CEQA requires an evaluation of a project's consistency with existing land use plans, and that evaluation is not affected by possible changes to an existing land use plan

that may be adopted in the future. In accordance with CEQA Guidelines Section 15125, the Draft EIR relied on information that was currently available to establish baseline conditions and, as such, uses information from the existing Wilshire Community Plan. That evaluation satisfies the requirement under CEQA that an EIR “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.”¹²¹ An “applicable” plan is a plan that has already been adopted and, thus, legally applies to a project; draft plans need not be evaluated. Further, it would be unprecedented for the City to require that an individual project be delayed until the completion of an update to a Community Plan.

The legal presumption is that a city’s general plan, including its various elements, is valid and that official duties have been performed regularly, thus placing the burden on those challenging the general plan to demonstrate that the general plan is inadequate. The burden is on the challenger to demonstrate the existence of a nexus between any plan inadequacies and the project or action being challenged. Although a court may not consider a city’s general plan or its parts suitable, such unsuitability may not be the basis for concluding that the plan is legally inadequate, unless there is a statutory requirement on point. Statutory law contains no requirement that a general plan’s land use element—which, in the context of the Project, is the Wilshire Community Plan—be updated at any given interval or in connection with any given event, or that a development plan must be put on hold for such an event to occur.

Further, the City has not adopted a mandatory timeframe under which Community Plans must be updated. Per the City of Los Angeles General Plan Framework Element, updates of the City’s Community Plans are dependent on adequate funding, and the Framework Element provides non-mandatory guidelines for future Community Plan updates.¹²² The General Plan states that, “[l]ike all general plan elements, community plans are comprehensively updated on a periodic basis through a city-initiated process. However, given the size and complexity of the City, the process of updating all of them takes time.”¹²³ The General Plan further states that “[s]ubject to availability of funding, all comprehensive updates of the citywide elements and the community plans for the purpose of implementing the Framework Element shall be initiated within five years of adoption of the Framework Element. Phasing of such updates may be made in accordance with Objective 3.3 and Policies 3.3.1 and 3.3.2 based on the monitoring of population, development, and infrastructure and service capacities as recommended through the

¹²¹ CEQA Guidelines § 15125(d).

¹²² City of Los Angeles, General Plan Framework Element, Executive Summary, re-adopted August 8, 2001.

¹²³ City of Los Angeles, General Plan Framework Element, Chapter 1, re-adopted August 8, 2001.

Annual Report on Growth and Infrastructure.”¹²⁴ While phasing of such updates may be done in accordance with the Framework Element objective and policies listed above, the Framework Element makes clear that the City does not require updates to its Community Plans within a fixed time frame.

The Wilshire Community Plan is not currently being updated; the City neither publicly notified nor initiated an update to the Wilshire Community Plan, and the timing of such an update is unknown. In any instance where a community plan has yet to be updated and adopted, a draft plan would not be applicable under CEQA. Accordingly, this comment that the Wilshire Community Plan needs an update is not relevant to the environmental analysis of the Project. In fact, consideration of an unknown future community plan update would be contrary to CEQA, which prohibits speculation and conjecture.¹²⁵

Refer to Response to Comment Nos. 5-8 and 11-29 regarding the proposed Regional Commercial designation for the Project Site.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-21

In addition to inappropriately proposing a general plan amendment and upzoning outside of the context a long-overdue update to the Wilshire Community Plan, redesignation of the Project Site as a Regional Center is inconsistent with the Framework Element of the General Plan, which is the City’s “strategy for long-term growth that sets a citywide context to guide subsequent amendments of the City’s community plans, zoning ordinances, and other pertinent programs.” The Project Site is not identified in the General Plan Framework as a location for a Regional Center. Redesignating the Project Site as a Regional Center would transform the community and set an adverse precedent for redevelopment around it.

Policy 3.1.5 of the Framework provides that amendments to community plans should not be allowed if there would be “a reduction in overall housing capacity.” In promulgating the DEIR, the lead agency has failed to address the “elephant in the room”—California’s housing and affordability crisis. The Project proposes to add approximately 5,700 new

¹²⁴ City of Los Angeles, General Plan Framework Element, Chapter 1, re-adopted August 8, 2001.

¹²⁵ CEQA Guidelines § 15187(d).

employees to the Project Site. However, the Project includes no housing and entirely eliminates the housing capacity of the Project Site in direct contravention of Policy 3.1.5 and in violation of the Housing Crisis Act of 2019. The DEIR should be revised and recirculated to analyze and disclose this conflict and the Project's direct and indirect impacts on California's housing supply and affordability crisis. The California legislature has expressly recognized that this crisis is of historic proportions and that "[t]he consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, **worsening poverty and homelessness, and undermining the state's environmental and climate objectives.**" See Government Code Section 65589.5(a)(2)(A). The DEIR should analyze the foreseeable pressure the Project will place on existing area rents and housing prices, which are already among the highest in California, and discuss how the Project will foreseeably lead to displacement affecting the most vulnerable populations in the area; specifically elderly residents and the members of minority groups.

Response to Comment No. 28-21

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation for the Project Site. Refer to Response to Comment No. 28-9 regarding housing and how the Project would not conflict with the Housing Crisis Act.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

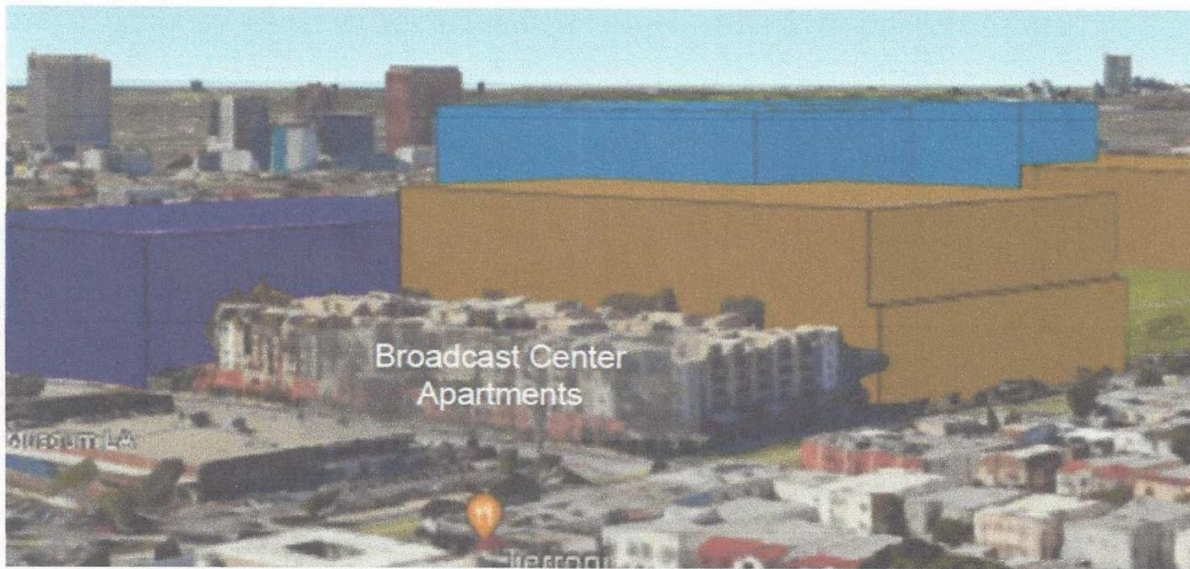
The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 28-22

The 3D model of the Project's proposed height zones in reference to the surrounding community illustrates the dramatic impact the Project would have on the community environment and character, and the precedent that would be set for future development in the area, which the DEIR fails to discuss or analyze.



The Project would line Fairfax Avenue with Height Zone C, permitting a wall of buildings up to 160 feet in height,⁵ which is significantly taller than the massive Beverly Center. Approximately 11,325 square feet of illuminated digital signs along Fairfax Avenue would glare down on the community, with an additional 6,100 square feet of illuminated digital signs glaring north towards Beverly Blvd. In the center of its mass, the Project would rise to 225 feet in height,⁶ dwarfing all surrounding structures, including the Beverly Fairfax National Historic District, the historic Fairfax commercial district, the neighborhood west of Fairfax, the historic Original Farmers Market, the Gilmore Adobe complex, and the Broadcast Apartments.



The DEIR turns a blind eye to the Project's obvious physical effects on the urban environment and its conflict with the City's numerous planning principles to protect historic resources and existing stable residential neighborhoods, including but not limited to the City's transitional height ordinance.

- ⁵ The height of buildings would be even taller if measured in accordance with the requirements of the Municipal Code, which should be applied to the Project.
- ⁶ The height of buildings would be even taller if measured in accordance with the requirements of the Municipal Code, which should be applied to the Project.

Response to Comment No. 28-22

Refer to Response to Comment No. 5-9 regarding how the massing diagrams presented in this comment and a number of other comments, including Comment Letter Nos. 5 and 26, are inaccurate and do not portray the Project. Refer to Response to Comment Nos. 9-16, 11-3, and 26-7 regarding height, massing, and its relation to historical resources and residential uses. Also refer to Response to Comment No. 11-3 regarding

the Beverly Center. Refer to Response to Comment No. 5-10 regarding the Preliminary Draft Specific Plan and how digital signage would not be permitted along the perimeter of the Project Site. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including the LAMC, among others, as well as the compatibility of the proposed uses with surrounding land uses, and concluded that impacts would be less than significant.

Comment No. 28-23

The DEIR also ignores the precedent the Project's up-zoning and massing would set; inviting nearby property owners to propose similarly scaled development along Beverly Blvd., Fairfax Avenue, and adjacent commercial corridors. The DEIR should be revised and recirculated to analyze these foreseeable environmental impacts.

Response to Comment No. 28-23

Growth-inducing impacts are analyzed in Section VI, Other CEQA Considerations, of the Draft EIR. Refer specifically to pages VI-14 through VI-17 of the Draft EIR. As discussed therein, direct and indirect growth-inducing impacts would be less than significant.

The assertion regarding the precedent the Project would set is incorrect. Refer to Response to Comment No. 11-3 regarding the size and scale of the Project. As discussed therein, the Project's proposed FAR of 1.75:1, which is an approximately 17 percent increase in permitted floor area, is similar to or less than the FARs of several adjacent and nearby properties.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-24

In light of the significant environmental impacts the Project would have at its proposed location, and the adverse precedent and transformative impact its approval would have on the Beverly Fairfax community, the DEIR is fundamentally defective for its failure to identify alternative location(s) for development the [sic] Project The [sic] Developer's basic objective of developing an integrated studio complex has, in fact, little relationship to the Project Site, and might be satisfied at other locations providing suitable land area for development. The same is true of the Developer's objectives of promoting local and

regional economic growth by creating a wide range of entertainment jobs as well as construction jobs and keeping production jobs in Los Angeles, and contributing to Los Angeles' status as a global creative capital and provide maximum opportunity for productions to be filmed in the region. These objectives can be satisfied anywhere in the region. CEQA does not permit a lead agency to give a project's purpose an artificially narrow definition in order to avoid analysis of alternative locations.

The Developer's contentions that developing an integrated studio complex is somehow "bound up" in the Project Site is entirely self-serving and plainly calculated to avoid CEQA-required analysis and consideration of alternative sites for the Project. In this regard, we note that the Developer proposes to demolish approximately two-thirds (495,860 square feet) of the existing historic Television City complex.

Response to Comment No. 28-24

This comment misunderstands the Project's underlying purpose. It is not just to construct an integrated studio complex, but "to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot." Thus, the underlying purpose of the Project and its objectives are closely tied to the existing Project Site and studio use that has been there for more than 70 years. Refer to pages V-11 and V-12 of Section V, Alternatives, of the Draft EIR and Topical Response No. 16, Project Alternatives Analysis.

The claim that the Project would demolish 495,860 square feet of historical resources is incorrect. First, the entire Television City complex is not identified as a historical resource. Within the Project Site, only the Primary Studio Complex is identified as HCM No. 1167. The Project would rehabilitate, but not demolish, the Primary Studio Complex and impacts were determined to be less than significant. Refer to Section IV.B, Cultural Resources, of the Draft EIR.

Comment No. 28-25

Moreover, the Developer's claimed objective of rehabilitating and preserving the integrity of the buildings which constitute the designated Historic Cultural Monument (the "HCM") is not dependent on developing the Project. Indeed, the Developer itself has conceded that the existing sound stages of the HCM will not necessarily be renovated or utilized: "Despite their limited size and flexibility, the four existing sound stages within the Studio Building are intended to remain active production spaces and would be renovated and modernized to the extent feasible, subject to industry market demand." DEIR II-17 (emphasis added).

The City's Cultural Heritage Ordinance protects the HCM against substantial alteration or demolition in the absence of CEQA review and overriding considerations, as well as an affirmative proposal to substantially alter or demolish the HCM. It does not follow that if the Project is not approved at this location, the HCM would not be retained. Certainly, there is no substantial evidence that in the absence of the Project (that is, demolition of two-thirds of Television City and the addition of the 1.6 million square feet of new development that the DEIR concedes),⁷ the Primary Studio Complex would not be preserved.

⁷ As discussed earlier, the DEIR improperly understates the actual amount of new development.

Response to Comment No. 28-25

As stated on page II-10 in Section II, Project Description, of the Draft EIR, one of the Project objectives is to “[r]ehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman’s master plan for a flexible and expandable studio campus.” This objective is one of several objectives of the Project and its inclusion as an objective does not imply that the HCM would not be retained if the Project is not approved. Specifically, refer to Section V, Alternatives, of the Draft EIR, which evaluates a “No Project” alternative (Alternative 1). As stated on pages V-21 to V-22 of this Section, the No Project Alternative would not involve any construction activities that could affect on-site or nearby historical resources, and no new buildings or changes to the physical environment that could affect the historical context of the on-site or nearby historical resources would be introduced. Therefore, the No Project Alternative would not result in impacts to historical resources, and the Project’s less-than-significant impacts would be avoided. However, without the Project, the Primary Studio Complex would not be rehabilitated as proposed by the Project, and the currently compromised character-defining features, as well as the visibility and prominence of the Primary Studio Complex from Beverly Boulevard, would not be restored.

The comment that the Draft EIR underestimates the amount of new development is incorrect. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate.

Comment No. 28-26

Further, the rhetorical homage paid to the Pereira & Luckman master plan is entirely self-serving. The DEIR’s technical appendices concede that CBS itself never implemented any part of the master plan, which was abandoned after CBS developed the Service Building and Studio Building. See Architectural Resources Group report at page 45. Furthermore, unlike the Developer’s plan, the Pereira & Luckman master plan did not propose any buildings taller than 12 stories. DEIR at 11-7. The Pereira & Luckman master plan did not

propose a 5,300 car parking structure. The Pereira & Luckman master plan did not propose a structured “base camp.”

An objective assessment of the history of the Project Site’s development tells an altogether different story than portrayed by the DEIR; which is that CBS chose not to develop the Project Site as conceived by Pereira and Luckman. Realization of the Periera [sic] and Luckman plan was never a goal, and was never pursued, by CBS. Why should it become an important objective of the City in considering the Project?

Response to Comment No. 28-26

The comments regarding the intent and realization of the Pereira & Luckman master plan do not concern the Draft EIR’s analysis of potential impacts to historical resources under CEQA. The master plan is discussed to provide historical context and explain the reasoning behind one of the Project objectives.

As stated in the 2018 Historic Resource Assessment, which was prepared by ARG as part of the HCM designation process prior to this Project and is attached to the Historic Report (Appendix C.1 of the Draft EIR):

When CBS engaged Pereira & Luckman to come up with a ground-up concept for Television City, it embarked on an ambitious project that would not only serve its brand, but strongly influence the design of postwar television production studios. Pereira’s 1948 survey of existing film studios had convinced the new partnership that the needs of television production were so different from that of film or radio that they necessitated the creation of a new and completely flexible building program. CBS gave the firm “virtual carte blanche to design a highly-flexible, infinitely-expandable solution, without precedents either to guide them or to restrict them.”¹⁰⁷ In response, Pereira & Luckman designed a two-building complex with highly configurable interiors and expandable exteriors—the first phase of implementing a master land use plan meant to guide all future use of the site.

CBS intended the Service Building and Studio Building to be only the nucleus of a massive development to include an office high-rise, a long retail block along Beverly Boulevard, and 24 studios in six projecting wings.¹⁰⁸ Newspaper articles unfailingly referred to Television City’s 1952 buildings as the “initial unit” or “first phase” of a much larger future complex that would eventually cover the entire site at Beverly and Fairfax.

¹⁰⁷ CBS, “CBS Television City—Los Angeles, Calif.—1952,” 1982, 83.

¹⁰⁸ CBS, “TVC History for 50th Anniversary,” 2002, 2.

(2018 Historic Resource Assessment, pages 44–45 [see Appendix C.1 of the Draft EIR])

Pereira & Luckman’s drawing of the Television City master plan is included on page 45 of the 2018 Historic Resource Assessment. As discussed in the newspaper stories included in the HCM nomination (included in Appendix C.1 of the Draft EIR), when completed, Television City would “cover 25 acres and [would] include a 13-story administration building of 600,000 square feet.”¹²⁶

The comment’s assertion that the Draft EIR’s assessment of Television City’s history was not objective is incorrect, as the Draft EIR and Historic Report relied upon and confirmed the analysis and conclusions in the 2018 Historic Resource Assessment.

As discussed in Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, the Project Site did not require re-evaluation as a historical resource. Under CEQA, a property designated under a local preservation ordinance is presumed to be a historical resource.¹²⁷ In addition, requirements for CEQA historical resource assessment reports established by OHR clearly state that if a property is already designated, an assessment of eligibility is not required. Instead, the report should summarize the property’s significance pursuant to the designation documentation.¹²⁸ As such, the Draft EIR and Historic Report were prepared in accordance with these requirements. Furthermore, the designation documentation for Television City was reviewed by HRG for the accuracy of the information, consistency with NPS guidance, and for physical changes that may have occurred to the property since the designation. HRG determined that the designation documentation was in conformance with best practices in historic preservation and that the property had not been altered since the designation. Thus, HRG concurred the designation made the appropriate findings.

As discussed in Response to Comment No. 28-25, one of the Project objectives is to “[r]ehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman’s master plan for a flexible and expandable studio campus.” The requirement to identify Project objectives is set forth in CEQA Guidelines Section 15124(b), which provides that an EIR shall contain “[a] statement of the objectives sought by the proposed project,” including “the underlying purpose of the project,” but does not impose any substantive limitations on those

¹²⁶ See Appendix C of the Draft EIR, pdf page 201.

¹²⁷ Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5(a)(2).

¹²⁸ Department of City Planning, Office of Historic Resources, Requirements for Historical Resource Assessment Reports, Updated July 2017.

objectives. Thus, CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives.

Comment No. 28-27

Given the fact that development of the Project does not depend on it being located at the Project Site, and that the DEIR has improperly constrained the Project objectives in order to avoid analysis and consideration of other sites for the Project, CEQA requires that the lead agency identify locations for the Project and include discussion and analysis of such locations in a revised and recirculated DEIR.

Response to Comment No. 28-27

Refer to Response to Comment Nos. 28-24 and 26-179.

Regarding recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-28

The DEIR is fundamentally deficient for failing to analyze the Gilmore Adobe complex as a sensitive residential receptor. The Adobe is a residential complex that has historically been utilized by the Gilmore family. It includes a continuing single family residence, a cottage and apartment. The cottage is approximately 40 feet from the Project, constituting the nearest single-family use to the Project. The residential wing of the Adobe is approximately 100 feet from the Project. The air quality and noise impact analyses of the DEIR must be revised to analyze potential construction and operational noise (including but limited to human annoyance impacts) and air quality impacts to the Adobe complex as a sensitive receptor single-family use. Feasible mitigation measures should be identified, including but not limited to a construction buffer zone. Without limiting the analysis that must be provided, there is no analysis of how studio-related production will impact the Gilmore Adobe. In addition, a sound barrier is not proposed between the Project and Gilmore Adobe.

Response to Comment No. 28-28

Please see Response to Comment No. 26-26 for a discussion of localized air quality and health risk impacts on nearby sensitive receptors. As stated therein, the shortest applicable (i.e., most conservative) sensitive receptor distance was used for the LST analysis and would, therefore, be representative of localized air quality impacts at the Gilmore Adobe location. While the Gilmore Adobe was not specifically identified in

Figure IV.A-4 as it is a commercial use, the closest sensitive receptor land use to the Project Site would be the residential use located immediately east of the Project Site (Broadcast Center Apartments). As shown in Table IV.A-10 and Table IV.A-11 of the Draft EIR, Project localized construction and operational emissions would remain below significance thresholds for receptors located within 25 meters (82 feet) of the Project Site. Please note that the nearest construction activities would be located approximately 125 feet from the Gilmore Adobe, and new buildings would be located a minimum of approximately 167 feet from the Gilmore Adobe. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptors. Thus, mitigation is not required.

Refer to Response to Comment No. 26-139 regarding the Gilmore Adobe and the thorough analysis of potential impacts to the Gilmore Adobe in the Draft EIR.

Comment No. 28-29

The DEIR is fundamentally deficient for failing to identify significant adverse impacts to the Gilmore Adobe complex as a historic resource as discussed in the September 13, 2022 report by Architectural Historian and Historic Preservation Planner, Kathryn McGee. CEQA Guidelines Section 15064.5(4)(b)(i) provides that a significant impact to a historic resource results from the "...alteration of the resource or **its immediate surroundings** such that the significance of an historical resource would be materially impaired." (emphasis added) In addition, Standard 9 of the Secretary of Interior's Standards provides that consistency with the Secretary's Standards requires that "the new work... will be compatible with the historic materials, features, size, scale and proportion, and massing **to protect the integrity of the property and its environment**" (emphasis added).

The DEIR inadequately addresses the issue of potential impacts to the Adobe complex by ignoring Standard 9 entirely, and limiting its analysis of impacts to the setting of the Gilmore Adobe to the following single sentence:

Integrity of setting for both resources have been substantially altered previously by construction of The Grove shopping and entertainment center in 2002, and neither The Original Farmers Market nor the Rancho La Brea Adobe retains integrity of setting.⁸

This sentence is entirely conclusory, and is unsupported by actual analysis of the environment surrounding the Adobe complex in accordance with CEQA and Standard 9 of the Secretary's Standards.

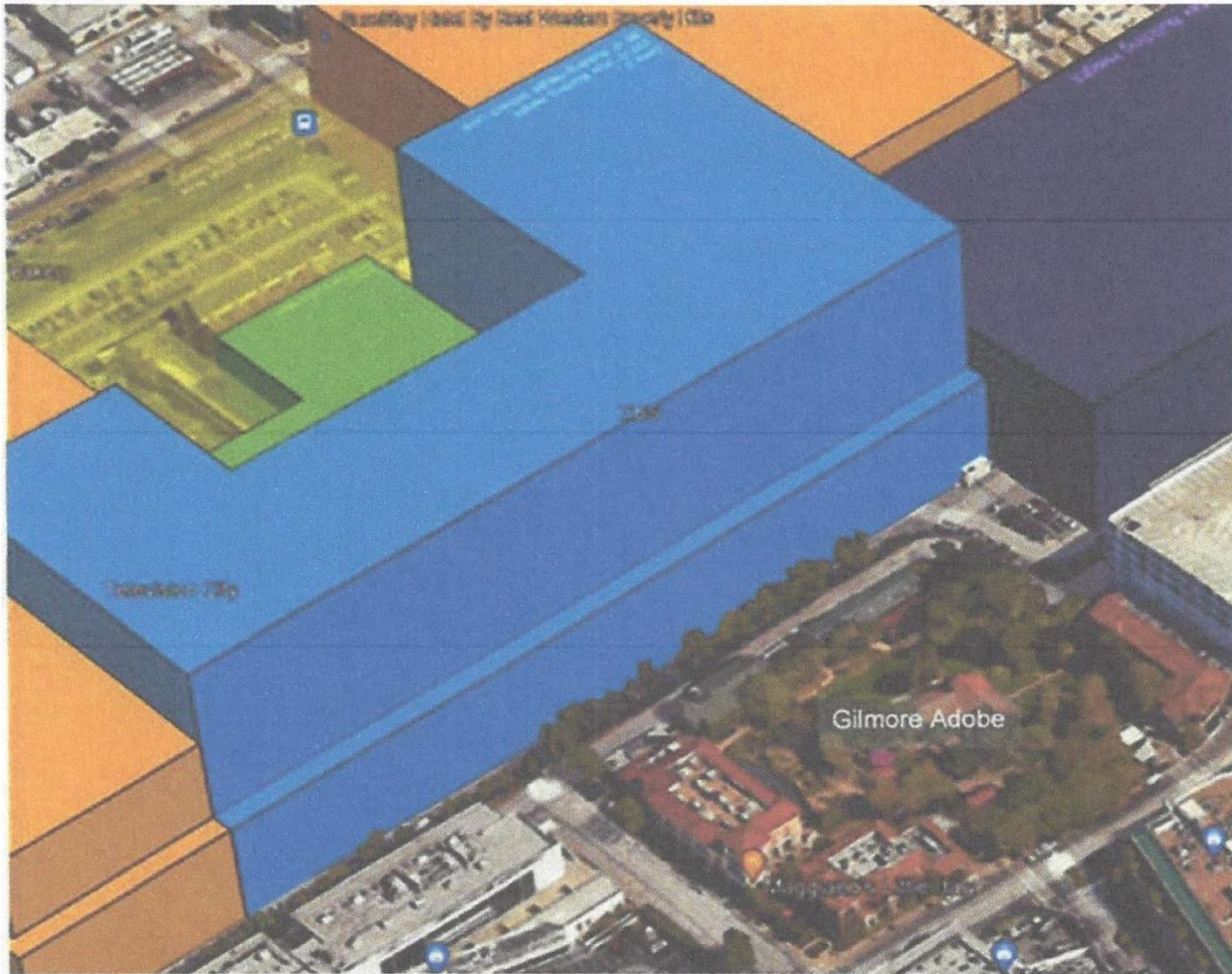
As discussed in Ms. McGee's expert report, historic aerials demonstrate that the immediate environment surrounding the Adobe complex has always retained a sense of seclusion and separateness. Indeed, the Adobe and its isolated setting are described in an historic photo description on file in the California Historical Society Collection held at USC as "shielded from public view by a fortress of foliage" and "as a bucolic island of tranquility in the heart of the city."

Despite the development of The Grove, the adobe exists as a secluded oasis ensconced in landscaping and trees. Adjacent development is primarily one and two stories in height and well-buffered from the Adobe complex (The Grove Parking Structure being the exception). Thus, the integrity of the Adobe's historic setting is largely intact and should be protected to avoid a significant adverse impact to the Adobe complex as a historic resource.

Indeed, existing CBS buildings within 150 feet north of the Adobe complex have respected the special setting of the Adobe complex, and are limited to one story in height in this area. The Project would allow buildings up to 225 feet in height within the same area setback by only 30 feet from the property line.⁹

Existing CBS buildings to east of the Adobe complex similarly respect the special setting of the Adobe, are set back over 150 feet, and are limited to one story in height. The Project would allow buildings up to 130' in height in the same area setback by only approximately 60 feet from the property line.¹⁰

The 3D model of the Project's height zones below provides a simple illustration of the Project's significant adverse impact upon the setting of the Adobe complex's setting.



Ms. McGee concludes that allowing out-of-scale construction in these areas as proposed by the Project would create a wall that overshadows the low-scale Adobe complex, especially the open spaces and north yard, a primary location for Gilmore family and community gatherings, and would entirely block out access to light and air in this area, significantly and adversely impacting the historic look and feel of the setting, and destroying spatial relationships in contravention of Standard 9 of the Secretary of Interior's Standards.

Nor, Ms. McGee concludes, would significant adverse impacts to the Adobe setting be avoided if building height is limited to the 88' "base height" proposed by the Developer (approximately 103' tall as measured in accordance with LAMC requirements) within the same areas now characterized by open space and one-story structures. Structures of this scale would similarly block out access to light and air in the Adobe complex and contravene Standard 9 of the Secretary of Interior's Standards.

In summary, the DEIR should be revised and recirculated to disclose that the new construction proposed by the Project fails to meet Standard 9 in that (i) it would destroy spatial relationships that characterize the adobe as a historic property, and (ii) that its size,

scale and proportion, and its massing fails to protect the integrity of the Project's environment (specifically the adobe complex). Accordingly, the DEIR should be revised and recirculated to acknowledge this significant adverse impact and identify potential mitigation measures.

⁸ Historic Resources Group, Historical Resources Technical Report TVC 2050 Project, May 2022:88.

⁹ The actual height of such buildings may be as much as 15' taller when measured in accordance with LAMC requirements, which should be applied to the Project.

¹⁰ We note that the actual height of such buildings may be as much as 15' taller when measured in accordance with LAMC requirement, which should be applied to the Project

Response to Comment No. 28-29

This comment misstates the threshold for analyzing impacts to historical resources under CEQA and suggests that the Rehabilitation Standards are the thresholds for significant impacts, which they are not. The analysis in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR) is correctly based upon the thresholds for significant impacts on historical resources in Appendix G of the CEQA Guidelines. As explained in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report, a project will result in a significant impact if it causes a "substantial adverse change" in the significance of a historical resource. Substantial adverse change means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."¹²⁹ In general, a project that complies with the Rehabilitation Standards is considered to have impacts that are less than significant.¹³⁰ Furthermore, the Rehabilitation Standards are not prescriptive, but instead provide general guidance for managing changes to historic properties. Standard 9 pertains to additions, exterior alterations, and related new construction of the subject historic property—not historic properties that may be present in the vicinity. The Rehabilitation Standards are not applied to properties that are not historically associated. Thus, the comment expresses a lack of understanding of the CEQA threshold and the Rehabilitation Standards, as well as their practical application. For a significant impact to occur, the integrity of the historical resource would have to be diminished to the degree that it would no longer be able to convey its significance.¹³¹ The Draft EIR and Historic Report correctly considered the impact the Project could have on the integrity of the historical resources in the vicinity, including their integrity of *setting*, and concluded that any impacts would be less than significant (refer to Draft EIR page IV.B-55 and Historic Report pages 87 to 88).

¹²⁹ CEQA Guidelines Section 15064.5(b).

¹³⁰ CEQA Guidelines Section 15064.5(b)(3).

¹³¹ CEQA Guidelines Section 15064.5(b)(2).

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 363-1 regarding the Draft EIR's analysis of potential impacts to the Gilmore Adobe (also referred to as the Rancho La Brea Adobe). As discussed therein, the Project would not physically alter any of the historical resources in the vicinity of the Project Site, including the Gilmore Adobe. This comment does not provide evidence of material alteration of the Gilmore Adobe. As explained and analyzed in the Draft EIR and Historic Report, all demolition, alteration, and new construction associated with the Project would be contained within the Project Site. Because the Project Site is located outside the parcel boundaries of the identified historical resources in the vicinity, the Project would not impact their integrity of immediate setting. Further, the broad setting of the Gilmore Adobe has been subject to continual change and alteration over time as is typical of urban environments. As such, the physical aspects of this resource that are critical to conveying its historic significance are largely contained to its respective property.

This comment mischaracterizes the setting around the Gilmore Adobe. The Gilmore Adobe was constructed in 1852, became the home of the Gilmore family in 1883, and was expanded in 1900. The area around the Gilmore Adobe continued to be developed and redeveloped until the construction of The Grove (Figures 4, 6, 7, and 8). Thus, Comment No. 363-3 only supports the conclusion in the Historic Report that the Gilmore Adobe does not retain its broad integrity of setting. As discussed in the Draft EIR, Historic Report, and Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, the broad setting of the Gilmore Adobe has been completely transformed since its original construction in the 19th century, as all the surrounding ranch land was developed and redeveloped over time. Construction of The Grove shopping and entertainment center, which opened in 2002 and includes an eight-level parking garage immediately east of the Gilmore Adobe, is only the most recent example. Today, the Gilmore Adobe is almost entirely enclosed by more recent retail and restaurant development (including back of house operations that are immediately adjacent to the Project Site) associated with The Grove. Therefore, the broader setting of the Gilmore Adobe does not contribute to its historic significance given the existing condition.

The claims that the Project would result in a significant impact to the Gilmore Adobe because it would be out of scale, overshadow, block access to light and air, etc., is not substantiated by facts or analysis and is not based on the threshold in Appendix G of the CEQA Guidelines. Refer to Response to Comment No. 5-13 for additional information. This comment does not provide any explanation as to what aspects of the immediate surroundings are instrumental in conveying the historic significance of this historical resource or how new construction located north of the Gilmore Adobe would diminish its integrity. As demonstrated in the Draft EIR, the Gilmore Adobe, including its component buildings, structures and associated outdoor spaces, would remain physically unchanged after implementation of the Project and it would continue to convey its historic significance.

Therefore, impacts to the Gilmore Adobe would be less than significant as defined by CEQA.

The massing model included in this comment is the same as the massing model included in Comment No. 5-13. Refer to Response to Comment No. 5-13 regarding the inaccuracies of this massing model. Also refer to Response to Comment No. 5-5 of this Final EIR for a diagram of Height Zone D and to Figures II-4(a) and II-4(b) of Section III, Revisions, Clarifications and Corrections to the Draft EIR, for aerial renderings depicting the Conceptual Site Plan.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-30

The DEIR is also fundamentally deficient for failing to adequately analyze potential direct impacts of construction vibration on the structure of the Gilmore Adobe as discussed in the September 13, 2022 report by Architectural Historian and Historic Preservation Planner, Kathryn McGee. The DEIR briefly addresses potential impacts from vibration in Chapter IV.I: Noise. This chapter acknowledges off-site historical resources including the adobe as “buildings extremely susceptible to vibration damage” and states that “the estimated vibration levels from the construction would be well below the 0.12-PPV building damage significance criterion at the five off-site historical resources.” This analysis is entirely conclusory.

The Gilmore Adobe was constructed in 1852 of adobe brick finished in stucco. Adobe is an extremely fragile building material, and the Gilmore Adobe is approximately 170 years old. The Gilmore Adobe’s method of construction is one of the primary reasons for its significance. There is a significant risk that significant adverse impacts to the Adobe could result from construction vibration, including but not limited to pile installation, during construction of the Project.

The DEIR references Federal Transit Administration: Transit Noise and Vibration Impacts Assessments (FTA) standards and applies 12-PPV ‘significance criterion’ to its evaluation of potential construction vibration impacts to the Adobe. This is the same criterion the DEIR applies to the wood-frame buildings nearby the Project and appears to have been selected merely as a ‘catch all’ rather than a criterion suited to an extremely fragile 170-year old adobe structure. What evidence or information substantiates the application of this criterion to a 170 year old adobe structure? Was such criterion developed in relation to

similarly-aged adobe structures? Please provide the empirical studies substantiating the application of this criterion to similarly-aged [sic] adobe structures.

The DEIR data tables included in the associated technical report provides that the 170 year old Gilmore Adobe will be 100 feet from construction equipment including: large bulldozer, caisson drilling, loaded trucks, jackhammer, and small bulldozer. The cultural resources technical report excludes mention of any potential impacts from pile installation and/or vibration on the Adobe.

The DEIR should be revised and recirculated to provide an evaluation of potential damage due to vibration impacts to the 170 year old Gilmore Adobe by a structural engineer with experience working on aged Adobe structures, disclosing potential impacts and identifying necessary mitigation measures. Significance criterion suited to an adobe structure of similar age should be utilized in any analysis. The potential for significant unavoidable impacts to the Adobe must be acknowledged. Mitigation measures must include monitoring of vibration levels at the adobe complex to ensure that damage does not occur.

Response to Comment No. 28-30

Refer to Response to Comment Nos. 26-139 and 363-2 for a discussion of the Gilmore Adobe. As discussed therein, impacts would be less than significant.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 28-31

In addition, potential impacts from the Project on the historic use and operations of the Farmers Market were not considered in the DEIR. Operation of the Farmers Market depends on support from the Shop Building which is located along the north boundary of the Farmers Market property, and which depends on open access to the service road separating Farmers Market from the Project Site. As depicted by the “Conceptual Site Plan” the Project proposes to intensely utilize this road to provide access to its 5,700 space parking garage as well as truck access to its Production Support area adjacent to the parking garage. All materials to support the Farmers Market and adjacent company-owned properties are loaded through this service road; loading activities only leave sufficient clearance for fire access. Thus, an increase in traffic would mean service vehicles may not have clearance to safely load and unload vehicles while maintaining an adequate fire lane; slow-moving service equipment (man lifts, scissor lifts, forklifts, etc.) that regularly travel down the service road would also be interrupted by an increase in traffic. This which would

disrupt the necessary Farmers Market support services in this location and therefore impede on the ability of the HCM to maintain its historic, significant use as a fully functioning, open-air market in contravention of Standard 1 of the Secretary of Interior's Standards. To mitigate this impact, secondary truck access to the service road and passenger vehicle access to service road should be eliminated.

Response to Comment No. 28-31

Regarding the potential traffic impacts to The Original Farmers Market's use of its Shop Building, the Project would not affect this operation for several reasons. First, the Project's proposed vehicular access points are located along the Southern Shared Access Drive which is located to the east of the Shop Building. The Shop Building itself is located along the western portion of the alley where The Original Farmers Market and the Project Site each have their own parallel alleyways. Thus, there is no interaction between The Original Farmers Market vehicles and the Project vehicles in the area of the Shop Building. Second, all vehicular traffic to and from those driveways and any loading operation on the Southern Shared Access Drive would flow to/from The Grove Drive, and thus would not use the alley from Fairfax Avenue (and would not pass in front of the Shop Building). Third, Project vehicle operations on the Southern Shared Access Drive would not restrict the movement of other vehicles using the Southern Shared Access Drive. Therefore, there would be no impact on The Original Farmers Market operations through the Project's use of the Southern Shared Access Drive.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding impacts to The Original Farmers Market. Refer also to Response to Comment No. 28-29 regarding the threshold for impacts to historical resources under CEQA. This comment does not provide any evidence demonstrating that the Project would result in a substantial adverse change to The Original Farmers Market such that it would no longer be able to convey its significance. The historic use and operation of The Original Farmers Market and the use of the Southern Shared Access Drive do not relate to the threshold for significant impacts to historical resources in Appendix G of the CEQA Guidelines. As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, historic impacts and transportation impacts are analyzed separately and have different thresholds. This comment does not provide any explanation as to how increased trips or usage would result in physical demolition, destruction, relocation, or alteration of The Original Farmers Market such that its significance would be materially impaired.

Refer to Response to Comment No. 363-6 regarding why Standard 1 is not applicable to the Project.

Further, this comment incorrectly asserts that mitigation is required. However, as discussed in Section IV.B, Cultural Resources, of the Draft EIR, potential impacts to historical resources would be less than significant, and no mitigation is required.

Comment No. 28-32

The DEIR also fails to identify and disclose conflicts that may be created by truck access and turning movements to and from the secondary driveway at the southern boundary of the Project Site and Fairfax Avenue. Feasible mitigation should be considered including restricting the hours for truck access at this location to between 9 p.m. and 7 a.m. daily.

Response to Comment No. 28-32

The driveway referred to in the comment is an existing driveway used by the Project Site for truck access. It would continue to be used for truck access with the Project and could also provide potential inbound or outbound access for shuttles to and from the Mobility Hub. Refer to Response to Comment No. 26-E.4-15 regarding truck access and maneuvers. These operations would not result in any new conflicts or warrant any restrictions on hours of operations. Because the commenter does not specify what conflict may occur, no further response can be provided and no mitigation is necessary.

Comment No. 28-33

We look forward to the lead agency's consideration to the comments and objections raised in this letter, and to the preparation of a revised and recirculated DEIR if the Director of Planning does not terminate the Developer's application—as the Director should do in accordance with the Director's expressly reserved discretion and for the numerous reasons as discussed in this letter. As required by CEQA Guidelines Section 15088, where the lead agency's position is at variance with the recommendations and objections raised in this letter "the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice."

Response to Comment No. 28-33

Refer to Response to Comment Nos. 28-2 through 28-32. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 29

Maria S. Salinas
President & CEO
Los Angeles Area Chamber of Commerce
350 S. Bixel St.
Los Angeles, CA 90017-1418

Comment No. 29-1

On behalf of the Los Angeles Area Chamber of Commerce, I write to support the Television City 2050 plan and the long-term investment in the studio and the region's media industry. The Los Angeles Area Chamber of Commerce is the oldest and largest business association in the L.A. region. The Chamber's mission is to advance opportunities and solutions for a thriving regional economy that is inclusive and globally competitive.

Maintaining a strong entertainment industry is vital to Los Angeles and its economy. The industry contributes billions in wages including production, distribution and a host of vendor-related jobs. The Television City plan which represents a \$1.25 billion investment, will create thousands of new jobs and allow the studio to grow and adapt to accommodate changing technology and industry advancements.

For seventy years, Television City has played an integral role in the entertainment industry and today it remains at the epicenter of television and movie production. Television City's plan for its approximately 25-acre campus will preserve its legacy as a working studio and enhance studio operations with technologically advanced soundstages and production office and support facilities needed to compete in a global entertainment market.

As we have read, the film and television industry in Los Angeles is currently experiencing a significant scarcity of production space. Without studio facility investments like this one in Los Angeles, the local industry's ability to attract and accommodate future production will be limited. L.A. is the home of entertainment, and we need to support the numerous crew members and small businesses here, who make production happen.

We welcome this plan's contributions to job creation and city revenue. With an expected \$2.4 billion in economic output annually upon completion, and projected improvements expected to create more than 4,200 jobs during construction and 18,700 jobs during operations, this project will ensure the success of the iconic studio while contributing significantly to our regional economy and keeping well-paying jobs in Los Angeles.

We thank you for your leadership and urge the City to support the TVC 2050 plan.

Response to Comment No. 29-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 30

Dan Seaver
Executive Director & Co-Founder
ManifestWorks
823 Seward St.
Los Angeles, CA 90038-3601

Comment No. 30-1

I want to express my strong support for TVC 2050, primarily, because it represents an unprecedented long-term investment in the future of our city's entertainment industry. Los Angeles continues to see increasing competition from other global production centers. Over the past couple decades, Los Angeles has been losing entertainment industry jobs to destinations such as Canada and Georgia.

Incentives and local tax credits have helped, but a bold new investment like this is desperately needed. This plan will not only bring jobs and support to local businesses, but it will also revitalize the local neighborhood.

ManifestWorks is an immersive workforce development organization that partners with a network of supportive professional businesses including Television City to provide job opportunities for underrepresented communities, specifically those impacted by foster care, incarceration and homelessness. This plan will create new jobs and help provide training opportunities in our industry.

TVC 2050 will modernize Television City and will ensure it can serve the growing and unmet demand for state-of-the art production facilities. Building for jobs changes lives.

Response to Comment No. 30-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 31

Donald R. Duckworth
Executive Director
Melrose Arts District
1934 Wilson Ave.
Arcadia, CA 91006

Comment No. 31-1

The Melrose Business Improvement District (MBID) enthusiastically supports TVC 2050: The Los Angeles Studio Plan.

The MBID Board of Directors, a non-profit 501.c.6 corporation dedicated to revitalizing Melrose Avenue in partnership with the City of Los Angeles and other community based organizations, met on July 22, 2022 to continue its on-going review of the TVC 2050 Studio Plan. MBID represents over 300 business and commercial property owners along Melrose Avenue between Fairfax Avenue and Highland Avenue. After full consideration of the TVC proposal, the Board voted unanimously to support the Plan and continue to participate in its implementation.

As Los Angeles continues to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers, the TVC 2050 Studio Plan represents an unprecedented long-term investment in the future of our City's most beloved industry.

TVC 2050 Studio Plan will modernize Television City, establishing a dynamic studio ecosystem and ensuring it can serve the growing and unmet demand for state-of-the-art production facilities. The Plan will create thousands of entertainment industry jobs, generate more than \$2.4 billion in new, annual economic output, and reaffirm Los Angeles' status as the creative capital of the world. These jobs and their economic output will directly affect small businesses located on Melrose Avenue.

TVC 2050 Studio Plan also represents a significant investment in the Beverly/Fairfax/Melrose community. The plan improves and beautifies the public realm, creating a more vibrant, pedestrian friendly environment; provides a multi-modal mobility hub, encouraging alternative means of transportation and connections to the surrounding neighborhood; and respects its surrounding context by reducing height along studio edges. Lastly, TVC 2050 Studio Plan celebrates and preserves the Historic Cultural Monument onsite.

As the leading business organization of the Melrose neighborhood, we recognize the potential benefits the project will bring to our community and the greater LA business community. Our business and property owners have a vital stake in this project and encourage the City to approve the TVC 2050 Studio Plan.

Response to Comment No. 31-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 32

Greg Goldin
President
Miracle Mile Residential Assn.
P.O. Box 361295
Los Angeles, CA 90036-9495

Comment No. 32-1

The Miracle Mile Residential Association (MMRA) opposes the proposed above-referenced TVC 2050 Project as presently contemplated in the Draft Environmental Impact Report.

Response to Comment No. 32-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 32-2

The TVC 2050 project will negatively impact and irrevocably change the Miracle Mile neighborhood as well as surrounding neighborhoods. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, the Miracle Mile will face irreversible and long-term health, traffic, and other environmental impacts.

Response to Comment No. 32-2

The issues raised by the commenter are addressed in Response to Comment Nos. 32-3 through 32-8.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 32-3

This enormous project has been quietly pushed forward without adequate public input due to more than two years of a global pandemic. In addition to opposing the project as currently proposed, the MMRA requests extended time for public comment on the voluminous DEIR.

Response to Comment No. 32-3

In addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively conducted stakeholder outreach and shared information about the Project in 2019. When the Project entitlement application was filed on March 26, 2021, TVC mailed thousands of brochures to its neighbors to announce its plan to expand and modernize the studio facility. The application filing was also covered by the Los Angeles Times, along with other local and regional publications. The Notice of Preparation (NOP) for the Project was filed on July 2, 2021. The NOP was sent to owners and occupants within a 500-foot radius of the Project Site, numerous agencies and City departments (including the Council Office and Neighborhood Council), and individuals and entities who identified themselves to the Planning Department as "interested parties." The NOP included a description of the Project and all entitlements sought, and stated that the Planning Department would be holding a Scoping Meeting on July 20, 2021 to present the Project, explain the CEQA process, and solicit comments regarding the environmental implications of the Project. The Draft EIR was published on July 14, 2022, in accordance with CEQA Guidelines Section 15087. The Notice of Completion and Availability of the Draft EIR was sent to the same extensive distribution list and explained that the CEQA-required 45-day comment period concluded on August 29, 2022. In response to community feedback and at the request of Councilman Paul Koretz's office, the Department of City Planning extended the comment period by 15 days, for a total of 60 days concluding on September 13, 2022, which exceeds CEQA requirements. Following the publication of this Final EIR, the EIR and the Project's requested approvals will be considered during public hearings before City decision-makers, including the City Hearing Officer and Deputy Advisory Agency, the City Planning Commission, the Planning and Land Use Management Committee, and the City Council with input from the City Attorney's office. Also refer to Response to Comment Nos. 78-2 and 85-3.

Comment No. 32-4

Here are some of our major concerns:

The scope of this project is too large. It would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. It would be twice the size and twice as tall as the Beverly Center, just one mile west.

Response to Comment No. 32-4

Refer to Response to Comment No. 11-3 regarding how the height and scale of the Project would be compatible with the surrounding community and how proposed building heights would not be twice as tall as the Beverly Center.

Comment No. 32-5

The project would place greater strain on already overburdened infrastructure and community services, importantly including fire and public safety.

Response to Comment No. 32-5

With regard to the adequacy of LAFD fire protection and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 16-5, 16-10, 26-147, and 35-133. Regarding public safety, as discussed in Response to Comment No. 16-5, per Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police services.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 32-6

Traffic and air quality would be severely impacted. The proposed twenty-year construction timeline will jam the already gridlocked nearby streets with 60,000 dump trucks, hauling millions of tons of steel, concrete, and construction materials as many as six days each week. As each phase of the project is completed, more traffic will ensue—commuters heading to work at the newly expanded facilities as well as dozens of production trucks entering and exiting the site every day. Gridlock, increased cut-through traffic, and more air pollution, will be the inevitable result. Our barely walkable streets will become even more perilous for pedestrians, and cyclists will be pushed off the road.

Response to Comment No. 32-6

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Refer to Topical Response No. 8, Vehicle Miles Traveled, and Topical Response No. 10, Trip Generation.

Refer to Response to Comment No. 26-30 regarding haul truck trips. As discussed therein, there would be a maximum of 300 haul trucks and 20 delivery trucks per day during peak export activities with a conservative estimate of up to 126,972 truck trips (63,486 trucks) during the 185 day grading period. Importantly, while construction-related activities associated with the Project would result in varying levels of truck and worker trips to and from the Project Site on a daily basis, such trips would be far less than operational Project-related trips. Even under phased construction, in which portions of the Project Site

may begin operations while other portions of the Project Site are under construction, the total trips generated to and from the Project Site would be less than those forecast for the Project upon completion and, therefore, would have less of an effect on traffic operations than the completed Project as evaluated in the Transportation Assessment. Additionally, the Project would include a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 and IV.K-37 of the Draft EIR), which would include provisions to limit the amount of construction-related trips during peak hours to the extent feasible. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

With respect to operational trips, as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, changes in driver delay are not considered to be transportation impacts under CEQA. As discussed on pages IV.K-72 through IV.K-78 of the Draft EIR, impacts related to VMT would be less than significant. In addition, refer to Topical Response No. 12, Safety and Congestion, regarding measures that have been included in the Project's transportation improvement program in the form of TDM strategies and traffic signal and operational improvements along the High Injury Network corridors that would advance the traffic safety goals of the City's Vision Zero Program and would include LOS benefits. Refer also to Topical Response No. 11, Transportation Demand Management.

With regard to cut-through trips, a detailed analysis of cut-through effects is provided in Section 5C (commencing on page 167) of the Transportation Assessment included as Appendix M.1 to the Draft EIR. As discussed in the introduction to and Section A, Deferred Mitigation, of Topical Response No. 9, Neighborhood Traffic Management Plan, a project's effect on automobile delay (including cut-through trips) is no longer an environmental impact under CEQA.

Refer to Topical Response No. 12, Safety and Congestion, regarding pedestrian safety.

Regarding air quality impacts, Section IV.A, Air Quality, of the Draft EIR provided an analysis of construction, operations, and concurrent construction and operations. As stated on pages IV.A-59, IV.A-66, IV.A-73, and IV.A-75 through IV.A-77 of the Draft EIR, air quality impacts would be less than significant for all criteria pollutants after the application of mitigation, except for regional construction NO_x emissions, and regional overlapping construction plus operational VOC and NO_x emissions during the long-term buildout scenario. All localized impacts would be less than significant with incorporation of mitigation measures.

Comment No. 32-7

The project includes zero affordable housing, yet will generate approximately 8,000 jobs—with nowhere for new workers to live without long, climate-impacting, commutes. This is completely contrary to state and local policy and will only increase the rent burden on those currently living nearby the proposed project.

Response to Comment No. 32-7

Television City has been an operating studio within the Project Site since 1952. As is typical of studio environments, the land uses are centered around production operations, including associated parking, loading, storage, and related basecamp activities. The Project Site does not currently contain housing, and the Project does not propose residential uses. As discussed in Section II, Project Description, of the Draft EIR, the Project's underlying purpose is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot.

With respect to employment growth, as discussed in the Initial Study provided in Appendix A to the Draft EIR, the Project is estimated to generate a total of approximately 7,832 employees at buildout, for a net increase of approximately 5,702 employees over existing conditions. Based upon employment data provided in the 2020–2045 RTP/SCS, an estimated 1,947,472 employees are projected in the City of Los Angeles in 2026, the Project's earliest buildout year, with 49,586 new employees projected in the City between 2021 and 2026. The Project's net increase in employment would represent approximately 0.29 percent of the total number of employees in the City in 2026 and approximately 11.50 percent of the employment growth between 2021 and 2026.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. As the Project does not include development of residential uses, it would not directly contribute to substantial population growth in the Project area. Additionally, many of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, similar to existing conditions. Thus, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly and such impacts would be less than significant.

The commenter states that the Project conflicts with state and local policies; however, no specific examples are provided. The Project's potential to conflict with state and local plans and policies is analyzed in the Draft EIR. Refer to the entirety of Section IV.H, Land Use and Planning, and Appendix I; pages IV.A-48 through IV.A-60 of Section IV.A, Air Quality; pages IV.E-52 through IV.E-73 of Section IV.E, Greenhouse Gas Emissions; and pages IV.K-45 through IV.K-72 of Section IV.K, Transportation, of the Draft EIR which present analyses of the Project's consistency with applicable policies. As discussed therein, impacts would be less than significant.

Pursuant to CEQA Guidelines Section 15131(a), a project's economic and social effects, including potential impacts on housing rent burdens, are not treated as effects on the physical environment under CEQA. Substantial evidence must be provided to demonstrate a reasonably foreseeable physical impact on the environment resulting from the economic or social change, and this comment does not include any such evidence. Therefore, no further response to this comment is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment No. 32-8

In addition to these specific concerns, the MMRA opposes the proposed amendment to the City's general plan which would designate the project a "Regional Center." This would give it the same zoning and planning designation as Century City and Downtown Los Angeles. Such a designation is not only unwarranted, but given the way in which the DEIR is written, would give the developer carte blanche to do as it pleases at any time in the future—without public input or review. It also runs contrary to the Wilshire Community Plan, which the city was obligated to update and would not permit this project nor a "regional center" designation. To grant such a designation is to do an end-run around the city's legally-mandated community plan update program and make a mockery of that process.

The DEIR is entirely inadequate. In place of a detailed plan that specifies exactly what project applicants will build, the applicants offer a "conceptual" site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site "a regional center" that writes its own rules.

Response to Comment No. 32-8

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation. Refer to Topical Response No. 6, Wilshire Community Plan Update, and Response to Comment No. 28-20 regarding the Wilshire Community Plan. Refer to Response to Comment Nos. 5-5 and 9-12 and Topical Response No. 1,

Clearly Defined Project Description and Specific Plan, regarding the Conceptual Site Plan, the adequacy of the Project Description, and the purpose and function of a specific plan. As discussed in Topical Response No. 1, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Refer to Response to Comment No. 32-3 regarding the noticing of the Project in accordance with CEQA and the public hearing process.

Comment No. 32-9

For the reasons stated, the Miracle Mile Residential Association asks that the city revisit the DEIR to address these concerns fully and adequately before proceeding in any way with this project.

Response to Comment No. 32-9

Refer to Response to Comment Nos. 32-2 through 32-8. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA.

Comment Letter No. 33

Dennis Wachs
Senior Lumber Trader
Neiman Reed Lumber Company
7875 Willis Ave.
Panorama City, CA 91402-5964

Comment No. 33-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 33-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 34

Barbara Gallen
President
Park La Brea Impacted Residents Group
16255 Ventura Blvd., Ste. 950
Encino, CA 91436-2313

Comment No. 34-1

I am writing on behalf of the Park La Brea Impacted Residents Group (PLBIRG). PLBIRG is a group of multifamily Park La Brea residents living 7/10 of a mile from the Proposed Project, near the intersection of Fairfax and 3rd Street.

We're aware of comments and concerns voiced by other neighborhood groups and businesses, re: the Project's proposed scope, density, massing, traffic congestion, lack of an affordable housing component, impacts related to the proposed access/egress on Grove Drive, as well as the proposed General Plan amendment which would designate the Project as a Regional Center. We support these groups and businesses' concerns, and recognize that some of the concerns fall under the entitlements portion of the City's decision-making rather than CEQA.

The amount of time provided for the public to review, digest and prepare comments to the DEIR was grossly inadequate given the length of the report, the scope of the Project, and the fact that it was published in the middle of the summer when many people were away and/or preoccupied with our children who were home from school. Our purpose here is to comment on a partial list of the Project's CEQA environmental impacts that we believe were inadequately addressed in the DEIR. Whether the Project is ultimately scaled back by 50% (or more), or built as proposed, the impacts would still be present and need to be addressed, as would many more DEIR-related issues we were unable to prepare comments for in the limited time provided.

Response to Comment No. 34-1

The issues raised by the commenter are addressed in Response to Comment Nos. 34-2 through 34-5.

With respect to the claim that the public review period was inadequate, which is incorrect, refer to Response to Comment No. 32-3. With respect to the extension request, see Response to Comment No. 16-102.

Regarding the length of the EIR, refer to Response to Comment No. 26-4.

Comment No. 34-2**EMERGENCY RESPONSE**

Appendix K of the DEIR contains the LAFD Response Letter (“Response Letter”) written by then-Fire Marshall (and current LAFD Fire Chief) Kristin Crowley. Per the Response Letter, the Project is first and foremost served by Fire Station No. 61 at 5821 W. 3rd Street, LA 90036, which is 1.2 miles from the Project and offers Task Force level services and equipment. (The next closest fire station offers less than half the resources and equipment as No. 61.)

The Response Letter states:

*“Based on these criteria [sic] (response distance from existing fire stations), fire protection would be considered **inadequate**.” [Bolding per LAFD.]*

“At present, there are no immediate plans to increase Fire Department staffing or resources in those areas which will serve the proposed project.”

The resource and staffing levels shown in the Response Letter are deemed “**inadequate**” at full strength, and we draw the City’s attention to the fact that at Fire Station No. 61 (the sole nearby station with Task Force response capability) actual levels of personnel and engines on most days are significantly less than full strength. For the past several years, multiple days per week, Fire Station No. 61 has forfeited the use of one of its engines because of insufficient staffing, per LAFD policy.

The Project at its proposed scale—or anything approaching it—would hijack already inadequate emergency response services from our neighborhoods and neighbor businesses.

Last week my teenage son discovered a suspicious, rapidly-spreading fire started in a cardboard box in our Park La Brea multifamily carport (determined to be arson by LAFD). It took 11 minutes from the 911 call for the LAFD to arrive on the scene. LAFD contained and extinguished the fire, and nobody was hurt. We later learned Station No. 61’s response time, from activation to arrival on scene was only 4½ minutes; the rest of the 11 minutes was the internal workings of the 911 system. 11 minutes is an unacceptable amount of time to wait. But the TVC 2050 Project as proposed portends much worse; a project of this size’s need for fire and emergency services will send response times skyrocketing and severely compromise public safety.

Response to Comment No. 34-2

With regard to the adequacy of LAFD fire protection services and infrastructure, refer to Response to Comment Nos. 9-35, 16-5, 16-10 and 26-147. With regard to LAFD emergency response times, refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35. Refer to the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR which confirms that the Project would result in less-than-significant impacts associated with fire protection facilities and the associated demand for new or expanded fire facilities. The information regarding the equipment and staffing levels for the fire stations included in Table IV.J.1-3 on page IV.J.1-16 of the Draft EIR was provided by Fire Marshal Kristen Crowley (refer to Appendix K of the Draft EIR). The comments regarding the equipment and staffing levels, the scale of the Project, and the non-Project-related arson incident are noted for the administrative record and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 34-3**CUT THROUGH TRAFFIC—IMPACTS ON NEIGHBORHOOD BELOW 3rd St. EAST OF FAIRFAX**

The DEIR fails at all to analyze or even mention cut through impacts on the residential neighborhood south of 3rd Street/east of Fairfax. This includes Park La Brea multifamily complex, other current and in-the-pipeline multifamily complexes along Ogden, as well as an elementary school. To paraphrase comedian Joan Rivers: “What are we, chopped liver?”

Potentially thousands of TVC 2050 employees, visitors, vendors and audience members daily will get off the 10 Freeway and drive north on a narrow, congested Fairfax Avenue headed to the Project’s 12 story parking structure off Grove Drive. To avoid the heavily congested 3rd and Fairfax intersection, lots of them will turn off Fairfax at Colgate, speed eastward running the stop sign and zip up to 3rd Street for a quick right turn onto 3rd St. to head east to Grove Drive and then up to TVC Parking Structure entrance. (Then do it all again in reverse going home.)

Availability of an entrance on Fairfax Avenue will not prevent or minimize the appeal of this cut through route to drivers wanting to avoid the congested, collision prone intersection and stretch of 3rd Street between Fairfax and Ogden. To be clear: congestion is not a CEQA impact, but a gross increase in cut through traffic on Colgate/Ogden is.

Not all motorists will use the Colgate/Ogden cut through and there will still be a huge increase in vehicle trips traveling north to TVC 2050 on Fairfax Avenue that need to cross 3rd St.

For drivers who continue north beyond Colgate, there is no right turn lane at Fairfax/3rd St. When they are forced to wait for throngs of pedestrians crossing crossing [sic] 3rd St. on eastbound side of intersection it can take a full signal phase for a single car to clear the intersection on a right turn. The City-approved doubling of the Town and Country project site's density on the S.E. corner will significantly increase both vehicle and pedestrian trips at that corner and the opening of the Metro at Wilshire will also significantly increase the pedestrian trips across 3rd St. When a right turning vehicle must begin their turn in the through lane, due to lack of a right turn lane, cannot make their turn, hundreds of northbound vehicles behind them are stalled.

We get that congestion itself is not a CEQA impact, but public safety is. When a new project dramatically increases the volume of vehicle trips on a roadway such that it paralyzes an intersection, the associated frustration, anger and carelessness of thousands of people wanting to get where they're going puts everyone at risk for collisions, both pedestrian v. vehicle and vehicle v. vehicle. The 3rd and Fairfax intersection is already on the high injury network and per LAPD Traffic data, there were 9 pedestrian v. vehicle collisions in barely 36 months in the vicinity of this intersection from 2019–2021.

Response to Comment No. 34-3

The non-CEQA analysis of cut-through trips included in the Transportation Assessment (Appendix M.1 of the Draft EIR) considered the residential streets south of 3rd Street, including Colgate Avenue and Ogden Drive and the Park La Brea streets. The Park La Brea internal streets did not meet the thresholds for cut-through analysis under the TAG because the Park La Brea internal streets are gated private streets, and, thus, there is no opportunity for cut-through effects as defined in the TAG. Ogden Drive and Colgate Avenue are primarily lined with institutional or retail commercial uses and would not be considered residential streets by the TAG. Refer to pages 167 through 178 of the Transportation Assessment and Topical Response No. 9, Neighborhood Traffic Management Plan.

Pedestrian safety and hazards are discussed in Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion. As discussed in detail therein, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting, and construction process, and safety issues, such as safe sight distance and pedestrian control across the signalized locations, would be confirmed in the detailed driveway design approval process. Refer to Response to

Comment No. 9-29 regarding the Project's less-than-significant impacts related to traffic hazards.

As a point of correction, the comment incorrectly identifies a 12-story parking structure off of The Grove Drive. As described on page 3 of the Transportation Assessment, the Conceptual Site Plan proposes a parking structure with eight levels above ground-level basecamp space in the southeast corner of the Project Site off The Grove Drive adjacent to the above-ground parking structure for The Grove. Nonetheless, as described on page II-30 of the Draft EIR, parking may be located anywhere within the Project Site and would be subject to height limitations designated in the Specific Plan. This comment also discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 34-4

Ridehailing Vehicle Trips and Greenhouse Gases (GHG)

The DEIR touts a mobility hub that will serve ride hailing drop off and pick up, but fails to consider, at all, the impacts on Greenhouse Gases (GHG) of the rail [sic] hailing component of vehicle trips related to the Project in addition to seriously undercounting the number of trips for an industry that does not follow a traditional "peak hour" paradigm.

Published studies from the City of San Francisco, Uber Lyft, and others, have been available for several years documenting that the explosion of ride hailing has significantly increased vehicle trips and GHG in both urban and suburban areas. LADOT and City Planning, and City Council officials continue to act as if these well documented impacts do not exist, and have rebuffed PLBIRG members' requests that our City study and consider the GHG impacts of projects that increase demand for ride hailing services.

The connection between ride hailing's growth and the increase in vehicle trips and GHG stems in part from "deadheading." Compared with a person using their own vehicle to visit TVC, the individual using ride hailing generates 2 trips for every trip generated by the person who drove their own car.

Response to Comment No. 34-4

The Draft EIR and the Transportation Assessment (included in Appendix M.1 of the Draft EIR) included ridesharing as one of many strategies included in the TDM Program for the Project. However, the Transportation Assessment did not reduce the number of trips to/from the Project beyond the base level that LADOT allows for any project located in the

Central Area Planning Commission (APC) area with similar transit accessibility. Thus, the Transportation Assessment estimate of Project vehicular trips added to the street system conservatively overestimates Project trips in the Draft EIR and in the transportation and GHG analyses presented therein; refer to Sections IV.E, Greenhouse Gas Emissions, and IV.K, Transportation, of the Draft EIR. Refer to Topical Response No. 11, Transportation Demand Management.

The Mobility Hub would provide off-street services for numerous types of travel choices, all of which will reduce the number of vehicular trips and VMT to/from the Project, even after the potential increases in vehicle trips associated with the rideshare industry. A summary of the potential net vehicular and VMT effects of the Mobility Hub may be found in Appendix FEIR-20 of this Final EIR. The overall effects of the Project TDM and the Mobility Hub activities has the potential to reduce vehicle trips to/from the Project Site by a net of approximately 3,400 trips per day and reduce overall Project VMT by over 23,500 VMT per day.

Clarification regarding VMT associated with the Mobility Hub is provided in the Mobility Hub Memo, included as Appendix FEIR-20 of this Final EIR. As discussed therein, the Mobility Hub would result in approximately 52 shuttle round trips (approximately 90 VMT per day based on an approximately 1.7-mile round trip) to the planned Metro D (Purple) Line Wilshire/Fairfax Station and would displace approximately 1,469 automobile trips (over approximately 9,800 VMT per day based on 6.7 VMT per capita as shown in Table IV.K-5 of the Draft EIR).

The comment's claim that every rideshare trip generates two trips for every trip generated by the person who drove their own car implies that every rideshare trip returns empty all the way to the original pickup location, thus doubling VMT, which is a gross overstatement of the number and length of rideshare trips. Most rideshare "deadhead" trips are very short, as the rideshare driver can pick up another rider nearby after dropping one off. This is especially true given the Project's location in an area with both high commercial and residential density providing many opportunities for a rideshare driver to quickly pick up a new fare and minimizing deadhead VMT.

Regardless, as discussed above, the VMT potentially generated by rideshare deadhead trips would be more than offset by the reduction in VMT from the other modes using the Mobility Hub. The number of rideshare trips expected to and from the Mobility Hub and the Project Site is very small compared to the overall trips estimated to be generated by the Project. Rideshare trips (including pick-ups and drop-offs by friends or family) are expected to generate approximately 596 net new daily trips to/from the Mobility Hub (refer to the Mobility Hub Memo in Appendix FEIR-20 of this Final EIR). However, the effects of the full TDM Program and the operation of the Mobility Hub have the potential to reduce vehicle trips to/from the Project Site by over 3,400 vehicle trips per day and total

VMT by over 23,500 VMT per day. Therefore, the net effect of these measures would substantially reduce VMT even accounting for a potential increase in VMT due to rideshare and pick-up/drop off activities.

The Draft EIR conservatively did not account for the reduction in criteria pollutant and GHG emissions associated with the Mobility Hub.

Comment No. 34-5

EXACERBATION OF PUBLIC HAZARD RELATED TO INADEQUATE PEDESTRIAN SAFETY INFRASTRUCTURE ON SOUTHERN PERIMETER

The DEIR indicates that Applicant proposes to improve and add to existing pedestrian infrastructure on Fairfax north of 3rd, as well as on Beverly and on Grove Drive, but fails to consider that crucial pedestrian routes to the Project include Fairfax between the Wilshire Metro station and 1st Street, and the segment of 3rd Street between Fairfax and Grove Drive. In terms of public access to TVC, 3rd St. is the Project's de facto southern perimeter.

Many, if not most, TVC-headed transit users riding the 3rd Street bus lines—which are among the most frequent service the City, so an appealing transportation option—may prefer to walk north on Fairfax or Grove Drive from 3rd St. to the TVC entrances, in lieu of waiting for a northbound Fairfax bus connection not as frequent. (Note: The DEIR cites the Fairfax 780 bus line which has been discontinued for some time.) These 3rd St. transit users will proceed to Television City by crossing 3rd at Fairfax and/or at Ogden, and/or at Grove Drive, and/or at Gilmore Lane if they have an access card to use the private “CBS” southern gate. To do that they must face intersections and a stretch of 3rd St. on the high injury network with a very high level of ped. v. vehicle collisions. In recent years (9 in 36 months).

We believe the Project-induced increases in pedestrian and vehicle trips necessitate study and implementation of Traffic Signal “Scrambles” at both the 3rd & Fairfax and 3rd & Ogden/Gilmore intersections to **provide a protected all-way pedestrian cycle that minimizes pedestrian and cyclist conflicts with vehicles**. Scrambles will also help to keep long queues of vehicles from being stalled and stressed out while a motorist in the lead position holds up an entire through lane waiting for a break in pedestrian traffic to turn right, helping to reduce the collision risks inherent in the increased vehicle and pedestrian trips.

Broken sidewalks discourage walking as a component of TVC trips originating from Metro station and other points south of 4th Street. Many TVC workers and visitors will want to walk, bike or scoot from the Wilshire Metro station up Fairfax all the way to TVC,

but they will face a stretch of Fairfax on its eastern side between 6th Street and 4th Street with extremely broken sidewalks, which could discourage them from doing so.

Response to Comment No. 34-5

Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 34-3 regarding hazards and pedestrian safety. As discussed in detail therein, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting, and construction process, and safety issues, such as safe sight distance and pedestrian control across the signalized locations, would be confirmed in the detailed driveway design approval process.

Given the lack of any significant impact, the suggestions offered by the commenter are not required by CEQA. Notwithstanding, the Project is improving the sidewalks and parkways along its north, east, and west borders to improve the walking quality and safety of any employees or visitors headed for the 3rd Street buses as described in the comment. Controlled crosswalks are available at 3rd Street traffic signals at The Grove Drive, Ogden Drive, and Fairfax Avenue to assist pedestrians accessing the buses on both sides of 3rd Street. Internal to The Original Farmers Market and The Grove, a private north/south sidewalk currently exists, which provides crosswalks across the South Alley and The Original Farmers Market Lane to create a controlled connection between the 3rd Street buses and the Project pedestrian gate on the southern property line for Project employees.

LADOT has previously investigated the feasibility of adding a scramble pedestrian system to the intersection of Fairfax Avenue and 3rd Street and found that the intersection did not meet the criteria for adding the scramble system at this location. Since the traffic volumes and the pedestrian volumes are much lower at the Ogden/Gilmore and 3rd Street intersection, it is highly unlikely that this intersection would meet the pedestrian scramble warrants either.

In terms of the condition of the sidewalk along Fairfax Avenue between 6th Street and 4th Street, this comment will be forwarded to City decision-makers for their information and consideration. The Project has committed to providing a free shuttle bus ride from the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction to the Project Site for its employees and visitors because the distance between the station and the Project is almost one mile, which is beyond the industry standard for acceptable walking distance for a daily walk trip from a transit stop.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 35

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Comment No. 35-1

This firm represents Mayer Beverly Park Limited Partnership, an affiliate of Apartment Income REIT Corp. (“AIR Communities”), which owns and operates the Broadcast Center Apartments (“Broadcast Center”) located at 7660 Beverly Boulevard (the “BC Site”).

Broadcast Center has requested our assistance regarding the proposed TVC 2050 Project, as currently proposed by Television City Studios, LLC, which we understand is controlled by Hackman Capital Partners (“Hackman”), on an approximately 25-acre site located at 7716–7860 Beverly Boulevard (the “Project Site”) in the City of Los Angeles (the “City”). The Project Site and the existing television studio (the “Existing Television Studio”) located on the Project Site was previously known as “CBS Television City” or “CBS Television Studios.” Hackman apparently modified the name to “Television City” after it acquired the Project Site and Existing Television Studio in early 2019.

Response to Comment No. 35-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 35-2

The BC Site is located adjacent to the Project Site at both its western and southern boundaries. It also borders Beverly Boulevard to the north and The Grove Drive to the

east. Broadcast Center has approximately 500 residents. Affiliates of Broadcast Center also own Palazzo West and Palazzo East, which collectively house approximately 2,500 residents and are located a short distance from the Project Site to the east.

Response to Comment No. 35-2

This comment briefly discusses the location of Broadcast Center Apartments in relation to the Project Site. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please note that Palazzo West apartments are located approximately 1,000 feet south of the Project Site and the Palazzo East apartments are located approximately 2,100 feet southeast of the Project Site.

Comment No. 35-3

As stated in the DEIR (as defined below), the proposed Project consists of the development of up to 1,626,180 square feet of new studio development, the retention of up to 247,820 square feet of existing studio facilities and the demolition of up to 495,860 of existing studio facilities. According to the DEIR, this would result in a maximum of 1,874,000 square feet of “soundstage, production support, production office, general office, and retail uses” on the Project Site, as well as related circulation improvements, parking and landscaping, notwithstanding that the DEIR states elsewhere that the proposed TVC 2050 Specific Plan (the “Specific Plan”) for the Project would allow a long list of other uses, including all of the permitted uses in the C2 zone.

Response to Comment No. 35-3

This comment providing a general overview of the Project is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Regarding permitted uses on the Project Site, note that the Project no longer allows all uses permitted in the C2 Zone (even though these uses are currently permitted). Refer to Topical Response No. 3, Permitted On-Site Uses. This clarification has been reflected in the Final EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 35-4

The Project requires numerous discretionary approvals, but the central entitlement is the requested approval of the Specific Plan that would establish the zoning for the Project Site and largely override the applicable zoning standards and requirements in the Los Angeles Municipal Code (the “LAMC”) that would otherwise govern development of the Project Site.

Indeed, the first sentence in Section II (Project Description) of the DEIR states that “[t]he TVC 2050 Project... would establish the TVC 2050 Specific Plan.” (DEIR, p. II-1)

On July 14, 2022, the City, through its Department of City Planning (“DCP”), circulated a Draft Environmental Impact Report (the “DEIR”) for the Project, which includes hundreds of pages of text, as well as numerous technical appendices with additional environmental information regarding the Project. However, while the DEIR repeatedly references and purports to describe provisions in the proposed Specific Plan, and notwithstanding that those alleged provisions underpin much of the analysis in the DEIR, the Specific Plan apparently does not exist yet because the City did not release it to the public concurrently with its release of the DEIR itself and has still not released it as of today, September 13, 2022, the last day of the 60-day comment period for the DEIR.

Response to Comment No. 35-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 26-5 regarding the proposed Specific Plan, how all of the physical aspects of the proposed Specific Plan were disclosed and analyzed in the Draft EIR, and a draft Specific Plan was not required to be included as part of the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website prior to the release of this Final EIR.

Lastly, refer to Response to Comment No. 11-3 regarding the Project’s use of a Specific Plan to regulate construction on-site consistent and compatible with the floor area, height, and other various requirements typically identified under the existing (Community Commercial, Limited Commercial, and Neighborhood Commercial) designations and the proposed future general plan land use designation of Regional Commercial.

Comment No. 35-5

Broadcast Center has significant concerns regarding the adequacy of the DEIR. As a threshold matter, the DEIR includes a nebulous and wholly unstable project description that provides no meaningful basis for environmental review. Instead of identifying critical project characteristics such as the specific location, size, massing, height, configuration and other technical features of the proposed buildings and uses, the production areas, the circulation system and parking, the environmental analysis is largely based on a “conceptual site plan” (the “DEIR Conceptual Plan”) that includes white boxes and several new onsite private streets that cover much of the Project Site, with no data or text at all. (DEIR, p. II-14 [Figure II-4]) The DEIR states that this conceptual site plan “illustrates one possible development scenario” and that actual development would **not** be governed by the conceptual site plan, but rather by the requirements of the Specific Plan, which the

public has never seen and may not exist yet. (*Id.* p. II-13, emphasis added) As the City must be aware, in *Stopthemillennium.com v. City of Los Angeles* (“*Millennium*”), 39 Cal. App. 5th 1 (2019), the Court of Appeal determined that an illustrative conceptual development scenario was neither a stable nor finite project description.

It is also apparent that virtually no subsequent review under the California Environmental Quality Act (“*CEQA*”) would be required for the actual buildings and related improvements proposed by Hackman following the adoption of the Specific Plan. In other words, the DEIR provides no meaningful information regarding the Project because the Specific Plan would allow virtually any type of development with a myriad of different uses at any location within the Project Site, but the actual development plans would be insulated from CEQA review.

Response to Comment No. 35-5

This comment is similar to those provided in Comment Letter Nos. 5, 9, and 26. Refer to Response to Comment Nos. 5-3, 5-5, 5-6, 5-15, 9-12, 9-13, and 26-11, as well as Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As explained in Response to Comment No. 5-3, 35-10, and Topical Response No. 1, a draft Specific Plan was not required to be part of the EIR and all of the physical aspects of the Preliminary Draft Specific Plan were fully disclosed and analyzed in the Draft EIR as demonstrated in Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. In addition, as explained in Response to Comment Nos. 5-6 and 9-13 and Topical Response No. 3, Permitted On-Site Uses, consistent with the Project’s studio objectives, the permitted uses on-site will only include the five studio uses and associated ancillary uses, and these uses have all been addressed in the Draft EIR.

Refer to Response to Comment Nos. 5-5, 9-12, and 9-13 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Conceptual Site Plan and the procedures under the proposed Specific Plan. As discussed therein, all plans included in an EIR are inherently conceptual. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Refer to Response to Comment No. 9-13 and Topical Response No. 1 regarding how the Draft EIR comprehensively analyzes the environmental impacts of a defined project. As demonstrated in these responses, Section II, Project Description, of the Draft EIR is accurate, stable, and finite and fully complies with CEQA, and the Project is distinguishable from the *Millennium* case.

Comment No. 35-6

In addition, the DEIR appears to bootstrap from defined terms in the unseen Specific Plan that deviate significantly from corresponding defined terms in the LAMC in order to understate the Project's various environmental impacts. The definition of "floor area" in Section 12.03 of the LAMC includes all actively used space in a building (other than parking areas). However, according to the DEIR, the Specific Plan definition of floor area excludes all sorts of commercial activity within the proposed buildings, including "basecamp areas" and other production support and production activity areas. (DEIR, pp. II-2 [n. 1]; II-13 [Table II-2, note a]) Based on this artificially narrow and inaccurate definition of floor area, it appears that the DEIR omits two entire levels of commercial activity—an at-grade "production activity level" and a below-grade "production operations level" that would be used for production activity and provide space for basecamp activity and production staging. (*Id.*, pp. II-25–26) These two production levels, which are not even graphically illustrated on the nebulous DEIR Conceptual Plan, could cover the entire Project Site. Given that many of the environmental analyses are based on the floor area of the Project, the omission of these production levels necessarily results in a substantial understatement of environmental impacts.

Response to Comment No. 35-6

This comment is similar to those provided in Comment Letter Nos. 5, 9, and 26. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 regarding the basis for the definition of floor area, how the Draft EIR does not underestimate the size of the Project, how all of the proposed areas, uses and activities have been accounted for in the impact analyses in the EIR regardless of whether they are considered floor area, and how no active production activities would be located in the basecamp and parking areas below Project Grade. This is consistent with the Draft EIR description referenced in this comment regarding the multi-level circulation plan, which is discussed further in Response to Comment No. 35-23. Also refer to Figure II-4(e), Basecamp Areas Below Project Grade—Future Conditions, and Figure II-6(a), Lower Level Below Project Grade—Future Conditions, in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for graphic depictions of the lower level below Project Grade.

Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Please note that the Preliminary Draft Specific Plan includes the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

Comment No. 35-7

Broadcast Center has numerous additional concerns regarding the individual environmental analyses in the DEIR, many of which stem from the unstable and incomplete project description.

Response to Comment No. 35-7

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion that demonstrates how Section II, Project Description, of the Draft EIR is accurate, stable, and finite and fully complies with CEQA.

Comment No. 35-8

The comments below reference and are supported by technical comments attached to this letter that were prepared by a variety of reputable consultants with significant expertise in their various fields. Attached as **Exhibit 1** is a technical comment letter prepared by Ramboll US Consulting ("Ramboll") with respect to the DEIR's analysis of air quality, greenhouse gas emissions, hydrology and water quality, noise, hazards and hazardous materials and land use (the "Ramboll Letter"). Attached as **Exhibit 2** is a technical comment letter prepared by Linscott, Law & Greenspan ("LLG") regarding the DEIR's transportation analysis (the "LLG Letter"). Attached as **Exhibit 3** is a technical comment letter prepared by Statistical Research, Inc. ("SRI") with respect to the DEIR's cultural resource, paleontological resource and tribal cultural resource analyses (the "SRI Letter").

Broadcast Center recognizes the importance of the entertainment industry in the City and the desire to expand production facilities. However, the development of additional studio facilities on the Project Site must be balanced with the impacts that the Project would have on existing residents and uses.

I.**SUMMARY**

Against that background, Broadcast Center has the following concerns with respect to the DEIR, each of which is discussed in detail below.

1. The DEIR's project description is inadequate.
2. The DEIR does not analyze the Project's maximum possible impacts.

3. The DEIR's reliance on an allegedly modified and artificial definition of "floor area" in the Specific Plan results in a substantial and unlawful understatement of the Project's environmental impacts.
4. The DEIR's analysis of the Project's air quality impacts is inadequate.
5. The DEIR's analysis of the Project's historical resource impacts is inadequate.
6. The DEIR's analysis of the Project's archaeological resource impacts is inadequate. inadequate. inadequate.
7. The DEIR's analysis of the Project's energy impacts is inadequate.
8. The DEIR's analysis of the Project's geology and soils impacts is
9. The DEIR's analysis of the Project's paleontological impacts is
10. The DEIR's analysis of the Project's greenhouse gas emissions impacts is inadequate.
11. The DEIR's analysis of the Project's hazards and hazardous materials impacts is inadequate.
12. The DEIR's analysis of the Project's hydrology and water quality impacts is inadequate.
13. The DEIR's analysis of the Project's land use and planning impacts is inadequate.
14. The DEIR's analysis of the Project's noise impacts is inadequate.
15. The DEIR's analysis of the Project's public services impacts is inadequate.
16. The DEIR's analysis of the Project's transportation impacts is inadequate.
17. The DEIR's analysis of the Project's tribal cultural resources impacts is inadequate.
18. The DEIR's analysis of the Project's utility and service systems impacts is inadequate.

19. The DEIR's analysis of alternatives is inadequate.

Response to Comment No. 35-8

This comment introduces technical exhibits and outlines the commenter's concerns about the Draft EIR. Refer to Response to Comment Nos. 35-10 through 35-168, below, regarding the issues raised in this comment.

Comment No. 35-9

II.

ANALYSIS

A. Overview of CEQA.

CEQA was enacted in response to the well-documented failure of state and local governmental agencies to consider fully the environmental implications of their actions. Selmi, *The Judicial Development of the California Environmental Quality Act*, 18 U.C.D. L. Rev. 197,202 (1984).¹ The California Supreme Court has repeatedly affirmed that CEQA must be interpreted liberally "to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Laurel Heights Improvement Assn. v. The Regents of the University of California* ("Laurel Heights"), 47 Cal. 3d 376, 390 (1988), quoting *Friends of Mammoth v. Board of Supervisors*, 8 Cal. 3d 247, 259 (1972).

Two of the central purposes of CEQA are to inform governmental decisionmakers and the public about the potential significant environmental effects of a proposed project and to identify ways that environmental damage can be avoided or significantly reduced. Guidelines §§ 15002(a) and (b).

The EIR is the heart of CEQA. Guidelines§ 15003(a). As noted by the California Supreme Court, the EIR:

is the primary means of achieving the Legislature's considered declaration that it is the policy of this state to "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state." (§ 21001, subd. (a).)... Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees. The EIR process protects not only the environment but also informed self-government. *Laurel Heights*, 47 Cal. 3d at 392.²

An EIR must be “prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” Guidelines § 15151. “The EIR must contain facts and analysis, not just the bare conclusions of a public agency. An agency’s opinion concerning matters within its expertise is of obvious value, but the public and decision-makers, for whom the EIR is prepared, should also have before them the basis for that opinion so as to enable them to make an independent, reasoned judgment.” *Kings County Farm Bureau v. City of Hanford* (“*Kings County*”), 221 Cal. App. 3d 692, 736 (1990), quoting *Santiago County Water Dist. v. County of Orange*, 118 Cal. App. 3d 818, 831 (1981). The certification of an EIR constitutes a prejudicial abuse of discretion if the failure to include relevant information precludes informed decisionmaking and informed participation, thereby thwarting the statutory goals of the EIR process. *Kings County*, 221 Cal. App. 3d at 712.

- ¹ The Office of Planning and Research has promulgated guidelines to implement CEQA. 14 Cal. Code of Regs. §§ 15000 et seq. (the “Guidelines”).
- ² An EIR serves “to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of its action.” *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 86 (1974). An EIR also allows the public to “determine the environmental and economic values of their elected and appointed officials, thus allowing for appropriate action on election day should a majority of the voters disagree.” *People v. County of Kern*, 39 Cal. App. 3d 830, 842 (1974). “The report... may be viewed as an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *County of Inyo v. Yorty*, 32 Cal. App. 3d 795, 810 (1973).

Response to Comment No. 35-9

This comment providing the commenter’s overview of CEQA is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 35-10

B. The DEIR’s Project Description Is Inadequate.

For the many reasons discussed below, the project description in the DEIR is inadequate and unlawful.

1. The Project Description.

As a threshold matter, the project description in Section II (Project Description) of the DEIR repeatedly references provisions in the Specific Plan, but the City did not release any such document for public review on or before the public comment period for the DEIR began on July 14, 2022, and still has not released any such document for public review. As discussed in more detail below, the project description repeatedly references provisions that purportedly will be in the Specific Plan, but often in general terms that leave the public

with little and sometimes no idea of what the Specific Plan actually would require and not require. This fundamentally impairs the public's ability to understand the nature of the Project and its environmental impacts.

Hackman filed an entitlement application for the Project with DCP on May 13, 2021 (the "Project Application"). The requested entitlements included the Specific Plan. The Project Application states that "the specific plan sets forth clear and cohesive set of principles and guidelines.... This language suggests that the Specific Plan existed on that date. If so, why was it not provided to the public concurrently with the release of the DEIR?

One of the attachments to the Project Application is a plan set with 18 sheets (the "Application Plans"). The second sheet is a "Conceptual Site Plan," but unlike the DEIR Conceptual Plan included in Section II of the DEIR, this conceptual plan includes a description of each of the illustrative buildings (e.g., stage, office, production support) and graphically illustrates the large parking structure in the southeastern corner of the Project Site. In addition, the Application Plans include floor plans for Project Grade Level, Levels 2–4, Level 5 and Level B1, as well as Site Elevations from The Grove Drive (east), Beverly Boulevard (north), Fairfax Avenue (west) and the southern alley (south).

The DEIR Conceptual Plan does not include any of those details. It consists of approximately 21 white boxes with no data or text that explains anything about any of them. Moreover, the DEIR Conceptual Plan entirely omits the potential "production levels" described in the DEIR (DEIR, pp. II-25–26), which include an at-grade "production activity level" and a below-grade "production operations level" that would be used for production activity and provide space for basecamp activities, production staging and loading. This omission is striking because, while, as discussed below, the DEIR Conceptual Plan is "illustrative," the DEIR firmly states that the Project will include the two production levels. And yet, the DEIR provides no graphic illustration or information regarding the location of these two levels, which could theoretically cover the entire Project Site.

And that graphic information apparently already exists. For example, looking beyond the four corners of the DEIR (which the reader should not be required to do), the Application Plans includes a sheet for "Floor Plan—Level B1," which appears to be the below-grade "production operations level." That sheet specifies multiple "production basecamp" and "production support" areas. That sheet, however, was omitted from the DEIR, even for "illustrative" purposes.

Response to Comment No. 35-10

Refer to Response to Comment No. 35-5. As discussed therein, and explained in Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, a draft Specific Plan was not required to be part of the EIR,

and all of the physical aspects of the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR. Refer to Response to Comment Nos. 5-5, 9-12, and 9-13 and Topical Response No. 1 regarding the Conceptual Site Plan. As discussed therein, the Conceptual Site Plan that was analyzed in the Draft EIR was based on the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*. Refer to Response to Comment No. 35-6 regarding how all of the proposed areas, uses, and activities have been accounted for in the environmental analyses throughout the EIR. Also refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for a graphic that shows the lower level below Project Grade, which is consistent with the application plans.

Contrary to this comment, Section II, Project Description, of the Draft EIR is not inadequate or unlawful. Rather, the Project Description has been completed in full compliance with CEQA.

Comment No. 35-11

Furthermore, hundreds of pages after the nebulous DEIR Conceptual Plan in Figure II-4, Alternative 5 (Above-Grade Parking Alternative) in the DEIR's alternatives sheds some light on Hackman's actual development plan. Alternative 5 "include[s] the same proposed development program and layout as shown in Figure V-6 on page V-128, except that all of the Project's subterranean parking would be moved above ground." (DEIR, p. V-127) Figure V-6, however, is not limited to a bunch of white boxes, but instead includes detailed information regarding specific buildings and parking structures, including the use, height and number of stories in each building and the location of parking areas and structures. (*Id.*, p. V-128) This includes a 140-foot-tall building adjacent to the western boundary of the BC Site.³ Why was all of this information omitted from the DEIR Conceptual Plan? Why is the reader forced to sift through hundreds of pages of text (and thousands of pages of technical appendices to the DEIR, as well as the Project Application) to find details of what appears to be Hackman's very specific conceptual plan? Does Figure V-6 actually show the details of the DEIR Conceptual Plan, albeit in the alternatives analysis? In short, what is going on here?

Moreover, during the DEIR comment period, Hackman also presented far more detailed information regarding its "conceptual" project to the City, in stark contrast to the absence of meaningful information in the DEIR Conceptual Plan. At the Cultural Heritage Commission meeting on August 18, 2022, Hackman made its second "informational presentation" to the Commission (see Item 5 in the meeting agenda attached as **Exhibit 4**). Hackman and its team presented a PowerPoint (attached as **Exhibit 5**) that included a slide titled "Project Evolution—Original Proposal Pre-Application Submittal (January 2021)." The next slide is

titled “Project Evolution- Revised Proposal/Application Submittal (March 2021)” and shows a simulation of development that would occur around the Primary Studio Complex (the two original, attached historic buildings on the Project Site, as discussed further below), as viewed from Beverly Boulevard.

The PowerPoint then presents a series of six slides with simulations of all or portions of the Project as envisioned by Hackman. The first one, titled “Project Evolution—Current Proposal/Draft EIR Proposal (July 2022)” is the same view from Beverly Boulevard that shows the intended development around the Primary Studio Complex. The next slide, however, which is titled “Illustrative Concept of HCM Viewshed,” is a very detailed simulation of the **entire** Project, apparently as contemplated in the nebulous DEIR Conceptual Plan. More detailed simulations follow with regard to specific development areas.

All of this more detailed information in the Project Application, the Alternative 5 Conceptual Site Plan and the multiple simulations shown to the Cultural Heritage Commission individually and collectively reflect that, notwithstanding the lack of concrete project details in the DEIR’s project description and virtually all of the impact analyses, Hackman and its architect have a very specific project in mind. And, while the preparers of the PowerPoint simulation slides threw in the word “illustrative” in many (although not all) of their titles, Hackman’s team clearly presented this as the project it intends to build and as an “evolution” from its prior proposals.

³ The same is apparently true for Alternative 3, which reduces the Project’s density by 20%. (*Id.*, p. V-62) Like the Conceptual Site Plan for Alternative 5, the Conceptual Site Plan for Alternative 3 appears to be a more detailed version of the DEIR Conceptual Plan, but with 20% reductions in the sizes of the various buildings and parking structures. (*Id.*, p. V-62 [Figure V-4])

Response to Comment No. 35-11

Refer to Response to Comment Nos. 5-3, 5-5, 9-12, 9-13 and 9-15 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Conceptual Site Plan and proposed development program, the level of detail required in an EIR for a specific plan project, how Section II, Project Description, of the Draft EIR complies with CEQA and includes sufficient information to evaluate the environmental impacts of the Project, and the required discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project that was analyzed in the EIR.

Refer to Topical Response No. 16, Project Alternatives Analysis, and Response to Comment Nos. 26-18, 26-180, 26-182, 35-164, 35-165 and 35-166 regarding the alternatives, including Alternatives 3 and 5. The graphics included in Section V, Alternatives, of the Draft EIR are provided so that the reader can visually understand the

physical differences between the Project and the alternatives. Contrary to the comment, these graphics do not include specific building details. Note that in addition to the Conceptual Site Plan, Section II, Project Description, of the Draft EIR also includes a height zone map with frontage areas and stepbacks, an open space and landscape plan, plans showing vehicular and pedestrian access, and a plan of the Mobility Hub. Furthermore, Sections IV.H, Land Use and Planning, and IV.K, Transportation, of the Draft EIR also include graphics depicting the public realm improvements and a site access map that incorporates the Conceptual Site Plan that notes the use of each of the buildings. Also note that the City's environmental review process is separate from any community outreach activities conducted by the Applicant. As discussed in Response to Comment No. 26-12, the Cultural Heritage Commission presentation was an informational presentation to explain the Project and the Project parameters that were adopted and disclosed in the Draft EIR to ensure that impacts to the historic Primary Studio Complex would be less than significant; the figures shown therein are consistent with the Draft EIR and Conceptual Site Plan. The Conceptual Site Plan reflects the application materials submitted by the Applicant to the City, and the Conceptual Site Plan along with the many other graphics and text within the Draft EIR convey the physical details of the Project to support the analyses required by CEQA.

Comment No. 35-12

The DEIR Conceptual Plan also includes two new private streets, one of which would be adjacent to the southerly boundary of the BC Site and the second of which would be adjacent to the western boundary of the BC Site. (DEIR, p. II-14 [Figure II-4]) However, as discussed further below, these new private streets could be located anywhere within the Project Site.

Response to Comment No. 35-12

The comment describes elements of the Conceptual Site Plan but provides no specific commentary. Please note that the Project does not include "new private streets" but rather internal circulation paths, as shown in the Conceptual Site Plan.

Comment No. 35-13

The DEIR project description explains that "[t]he specific mix of uses ultimately constructed will depend upon market demands, and the Specific Plan would allow flexibility in locating the various uses within the Project Site." As a result, the DEIR Conceptual Plan **"illustrates one possible development scenario that could be developed in conformance with the proposed Specific Plan,"** but "actual development would be governed by the requirements of the proposed Specific Plan and **not** the [DEIR Conceptual Plan], which is intended to provide an illustrative depiction of future Project Site development." (*Id.*, p. II-13, emphasis added) Therefore, the DEIR Conceptual Plan is

simply one “scenario” among unlimited scenarios that might result from the adoption of the Specific Plan.

Response to Comment No. 35-13

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5, 9-12, and 9-13 regarding the Conceptual Site Plan, the required discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project analyzed in the EIR, and how all of the physical aspects of the proposed Specific Plan, including the proposed land uses, are consistent with the Draft EIR.

Comment No. 35-14

According to the project description, the Specific Plan would only regulate development on the Project Site in two primary ways. First, as shown on Table II-2, the “proposed development program” (the “DEIR Conceptual Program”) could include up to 1,626,180 square feet of new development, including sound stages (295,820 square feet), production support (80,890 square feet), production office (635,400 square feet), general office (594,090 square feet) and retail uses (20,000 square feet). Note c in Table II-2 states that “an estimated 6,608 square feet of existing production office space would not be demolished but may be converted to basecamp/parking uses, while Noted states that an estimated 38,068 square feet of existing general office space would not be demolished but may be converted to basecamp/parking uses.” (*Id.*) Relatedly, precisely 772,000 cubic yards of excavated dirt would have to be hauled from the Project Site and the import of 50,000 cubic yards of fill may be required.⁴ (*Id.*, pp. II-1, II-15)

These very precise numbers reflect that Hackman has developed a specific development project for the Project Site. Nonetheless, the DEIR makes no reference to it and it is impossible to discern even if that specific development project is consistent with the illustrative DEIR Conceptual Plan. The precise numbers in Table II-2 may be generally consistent with the Application Plans, but the DEIR does not reveal that either.

In any event, the stated floor areas for the proposed new construction are not fixed either. As stated in Note b in Table II-2, “[t]he proposed new construction floor area amounts listed in this table **represent one possible development scenario** that could be developed in conformance with the proposed Specific Plan.^[5] Actual development would be governed by the requirements of the proposed Specific Plan.” (*Id.*, emphasis added) Moreover, the stated floor areas requirements can be substantially increased and/or decreased pursuant to “land use exchanges” between the various uses that would be permitted in the Specific Plan. (*Id.*, pp. II-16–17) As one example, the total permitted “production support floor

area” can be increased from 104,000 square feet to 1,626,180 square feet. (*Id.*, pp. II-16, II-13 [Table II-2])

- ⁴ Parenthetically, the DEIR does not appear to explain why 50,000 cubic yards of imported fill may be required when a much larger volume of dirt (772,000 cubic yards) has to be exported.
- ⁵ It seems apparent that the DEIR Conceptual Plan and DEIR Conceptual Program are linked, so that the floor area amounts in the DEIR Conceptual Program correspond to the white boxes shown on the DEIR Conceptual Plan. Even this is uncertain, however, because the DEIR does not appear to acknowledge it.

Response to Comment No. 35-14

Refer to Response to Comment Nos. 35-5, 35-10, and 35-11 regarding the Specific Plan and Project Description.

Refer to Response to Comment No. 26-5 regarding the development regulations under the proposed Specific Plan. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 26-6 regarding the purpose and function of a specific plan and the differences between a specific plan project and an individual building project. The massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning’s website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project’s entitlement case number, *CPC-2021-4089-AD-GPA-ZC-SN-SP*. Refer to Topical Response No. 1 regarding the Land Use Exchange Program and the maximum limitation of 450,000 square feet of production support. As discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

With regard to the calculations of import and export, the earthwork evaluation is based on the maximum potential grading for the proposed development program. The volume of cut is mostly due to export of soil associated with the underground building levels. The volume of fill is associated with potential for the final site elevations to be higher than the existing site elevations, and the volume of fill assumed in the Draft EIR is a conservative estimate. Even in projects where the volume of cut is much larger than the volume of fill, it is typical for fill material to be accounted for in the unforeseen case the cut material is unsuitable for development. See Figure 3 of the Soil Management Plan (included in Appendix G.1 of the Draft EIR). Also refer to Appendix FEIR-8, Details of Project Buildout and Construction.

Comment No. 35-15

The DEIR Conceptual Program permits (1) the demolition of up to 495,860 square feet of existing uses and (2) the retention of up to 247,820 square feet of existing uses. (DEIR, pp. II-12–13, II-1) These maximum square footages, however, are nonsensical and misleading. The total of these two amounts is 743,680 square feet, which the EIR claims is the floor area of the existing buildings. Therefore, in this zero sum game, Hackman could not demolish fewer than 495,860 square feet of existing improvements because that would cause the retained floor area to exceed 247,820 square feet of existing improvements. Conversely, Hackman could not retain less than 247,820 square feet of existing improvements because that would cause the demolished floor area to exceed 495,860 square feet. In other words, Hackman actually proposes to demolish precisely 495,860 square feet of existing improvements and retain 247,820 square feet of existing improvements. This further indicates that, contrary to the amorphous project description in the DEIR, Hackman has a very specific project in mind that is not described in Section II of the DEIR.

Response to Comment No. 35-15

Refer to Response to Comment No. 35-14 regarding the proposed development program. Note that the numbers presented in Table II-2 that are cited in the comment reflect the Conceptual Site Plan.

Comment No. 35-16

The Specific Plan would also establish six Height Zones (A-F) that would limit the height of buildings from 58 to 225 feet above a defined “Project Grade” of 201 feet above mean sea level (“AMSL”).⁶ (*Id.*, pp. II-17-19) The DEIR emphasizes the nebulous nature of these height zones, stating that they “do not represent the actual development footprint of Project buildings.” (*Id.*, p. II-20)

We note that the portion of the Project Site adjacent to the western boundary of the BC Site is in Height Zone C, which permits a maximum height of 160 feet over 40% of that height zone area (*id.*, pp. II-18-19), with a 30-foot setback (which the DEIR confusingly describes as a “frontage” area) from the eastern boundary of the Project Site. (*Id.*, p. II-20) As a result, one or more 160-foot-high buildings could be constructed along the entire eastern boundary of the Project Site, 37 feet from the Broadcast Center building, which is approximately seven feet from the western property line of the BC Site. Moreover, the 30-foot frontage area could be occupied by the new four-lane private street shown on the DEIR Conceptual Plan⁷, which Hackman has advised Broadcast Center would include substantial truck traffic entering and exiting the Project Site.⁸ As discussed below, the environmental analyses in the DEIR do not account for this potential scenario (in particular

with respect to the Project's air quality and noise impacts), which Broadcast Center considers part of a worst-case scenario with respect to its property.

The DEIR project description also claims that the height zones and related frontage areas and stepbacks “would guide future development in a manner that concentrates building mass and height toward the center of the Project Site.” (*Id.*, p. II-20) That is wildly untrue. The height zones restrict new construction in proximity to, and on top of, the two original, existing and attached buildings on the Project Site—the Service Building and the Studio Building—which are located in the middle of the Project Site and which the DEIR collectively defines as the “Primary Studio Complex” and is a designated City Historic-Cultural Monument (“HCM”). Height Zone A, which is a “Viewshed Restoration Area” directly north of the Primary Studio Complex, limits building height to 58 feet directly north of the Primary Studio Complex. In addition, Height Zones E and F prohibit or substantially limit new construction over the Primary Studio Complex.

- ⁶ The DEIR engages in sleight-of-hand here that will surely mislead most readers. It acknowledges that the elevation of the Project Site slopes downward from northeast to southwest, from 201 feet to 185 feet AMSL (*id.*, p. 11-9), but sets the “Project Grade” at 201 feet AMSL for the entire Project Site (*id.*, p. 11-17 [n. 8]). So, for example, Height Zone C includes the southwestern portion of the Project Site and permits a maximum building height of 160 feet above the arbitrary Project Grade of 201 feet AMSL. However, since the actual elevation in the southwestern portion of the Project Site is only 185 feet AMSL (16 feet lower than the arbitrary Project Grade), the maximum building height at that location is actually 176 feet above ground level (160 + 16).
- ⁷ While the DEIR Conceptual Plan omits the width of this “illustrative” street, another graphic in Section IV.K (Transportation) of the DEIR indicates that it is 30 feet in width, the precise depth of the frontage area (*id.*, p. IV.K-43 [Figure IV.K-3]), so that, in the “illustrative” DEIR Conceptual Plan, there would be no real buffer at all between the project buildings and the BC Site, but rather a use that would generate its own substantial impacts.
- ⁸ However, the placement of this private street within the 30-foot frontage area contradicts the DEIR text, which states that “features such as sidewalks, landscaping, security kiosk, fences, walls, projections, stairs, balconies, and parking would be permitted” in the frontage areas. (*Id.*, p. IT-20) If Hackman wishes to include streets within frontage areas, why does the DEIR list omit that feature? Furthermore, if, as the DER states, frontage areas “would function as buffers and transitional space around the Project Site perimeter,” how does a four-lane private street designed to accommodate truck traffic qualify as a “buffer” for Broadcast Center?

Response to Comment No. 35-16

Refer to Response to Comment Nos. 9-16, 11-3, and 26-7 regarding the height zones, building height, and Project Grade. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, a specific plan is a regulatory land use ordinance that establishes zoning regulations, such as maximum height limits. Notably, the existing zoning for the Project Site permits unlimited height. Nevertheless, the proposed Specific Plan would impose height limits across the entire Project Site. Further, the proposed height limits in each of the height zones have been consistent throughout the life of the Project; the height limits described in the Draft EIR are

the same as those included in the Project's application submittal in March 2021, the Initial Study (Appendix A of the Draft EIR; see pages 17 to 19), and the Preliminary Draft Specific Plan. Also refer to Response to Comment Nos. 11-3 and 26-19 regarding how the Project meets its objective to concentrate building mass and height towards the center of the Project Site while still preserving the integrity of the HCM.

Regarding the frontage areas, refer to Response to Comment Nos. 16-56, 26-7, and 26-8. There is currently no setback requirement along the Shared Eastern Property Line. As discussed on page II-21 in Section II, Project Description, of the Draft EIR, the Project is imposing a 30-foot frontage area requirement along the Shared Eastern Property Line. Contrary to this comment, the frontage area would not be occupied by a "new four lane private street." Rather, as shown in the Conceptual Site Plan provided in Figure II-4 and the Vehicle Access Plan provided in Figure IV.K-3 of the Draft EIR, the 30-foot frontage area along the eastern boundary of the Project Site adjacent to the Broadcast Center Apartment building includes an internal circulation path and a landscaped area. Refer to Response to Comment No. 26-26 regarding how operation of the Project, including on-site vehicles, would not result in significant air quality impacts to the Broadcast Center Apartments. In addition, refer to Response to Comment No. 26-135 regarding how operation of the Project would not result in significant noise impacts at the Broadcast Center Apartments.

Comment No. 35-17

Project Design Feature CUL-PDF-1 includes several additional restrictions on development in proximity to the Primary Studio Complex. First, new buildings cannot be located immediately north of the complex. Second, any new occupiable structure immediately east of the Service Building that exceeds the height of the Service Building must be set back southerly from the north façade of the Service Building by a minimum of 60 feet and separated from the east façade of the Service Building by a minimum of 15 feet. Third, any new occupiable structure immediately west of the Studio Building that exceeds the height of the Service Building must be set back southerly from the north façade of the Service Building by a minimum of 150 feet and separated from the west façade of the Studio Building by a minimum of 10 feet.⁹

While the DEIR Conceptual Plan vaguely reflects one of an infinite number of development options, it appears to reflect the restrictions discussed in the preceding paragraphs because it shows the most significant open-space areas in the central portion of the Project Site, with new development pushed toward and to the perimeter of the Project Site, including significant development immediately adjacent to Broadcast Center. Slide 19 in Hackman's August 18 presentation to the Cultural Heritage Commission (see **Exhibit 5**) clearly reflects that the new development has been concentrated away from the center of the Project Site and toward its boundaries, including multiple buildings adjacent to the BC

Site. The DEIR's false claim to the contrary further erodes its value as an informational document.

- ⁹ While the second and third restrictions limit in some way development in the central portion of the Project Site, they are incomprehensible as written. For example, a new building could not be set back southerly from the north façade of the Service Building by a minimum of 60 feet because the Service Building itself is located to the south of its north façade. This promotes yet further uncertainty as to what can be built where on the Project Site.

Response to Comment No. 35-17

The Conceptual Site Plan that was analyzed in the Draft EIR conforms with all the Project Parameters included in Project Design Feature CUL-PDF-1. This comment incorrectly states that a new building could not be set back southerly from the north façade of the Service Building by a minimum of 60 feet (which is a required Project Parameter for any new construction immediately east of the Service Building); refer to Figure II-10 on page II-957 associated with Response to Comment No. 26-E.2-3, above, which shows how the Conceptual Site Plan analyzed in the Draft EIR complies with the Project Parameters.

As discussed in Response to Comment Nos. 11-3, 26-19, and 35-16, the Project would meet the Project objective to concentrate building mass and height toward the center of the Project Site while also preserving the integrity of the HCM. The tallest buildings would be located in Height Zone D, which is located in the center of the Project Site south of the HCM. Further, a 30-foot frontage would be required along the Shared Eastern Property Line, and, therefore, new buildings would be substantially set back from Broadcast Center Apartments. Please note that Slide 19 in the presentation referenced in this comment includes a rendering of the Conceptual Site Plan that was analyzed in the Draft EIR.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Conceptual Site Plan and Project. The draft Specific Plan is not necessary for evaluation of the Project. Please note that the proposed Specific Plan includes the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 35-18

The project description also lacks a fixed construction period. The DEIR states that “buildout under the Specific Plan could take place in one phase over a 32-month period or could occur in phases over multiple years. Accordingly, the applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.”¹⁰ (DEIR, p. II-12; see *also* p. II-33) Therefore, the construction period could be anywhere between approximately three years and 20 years, an enormous range of time. Moreover, the DEIR presents no information regarding potential project phasing.

¹⁰ The DEIR engenders yet more uncertainty by stating in conflicting fashion elsewhere in the DEIR that “Project buildout is anticipated by 2026,” but “the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.” (DEIR, p. V-4, n. 3; see *also* p. IV.K-42) Is buildout anticipated by 2026 or, as the project description states, could it really occur anytime between 2026 and 2043? If project buildout is anticipated by 2026, why does Hackman need a 20-year development agreement? Moreover, to state that the requested development agreement could extend buildout to 2043 flips cause and effect. Hackman desires the vesting that comes with a development agreement so that it can develop the Project over a period of more than 20 years, not the other way around.

Response to Comment No. 35-18

Refer to Response to Comment Nos. 9-24 and 28-7 regarding the timeframe for the Project, the Development Agreement, and how a long-term buildout has been adequately addressed in the impact analyses throughout the Draft EIR.

Comment No. 35-19

In addition, the project description includes contradictory information regarding the permitted uses on the Project Site. As previously discussed, the DEIR Conceptual Program in Table II-2 includes just five uses—sound stages, production support, production office, general office and retail. Elsewhere in the project description, however, the DEIR states that the Specific Plan will allow numerous other uses, including, for example, motion picture studios¹¹, museum exhibits and theaters, child care and educational facilities, fitness facilities, mills/manufacturing, sleeping quarters, recreational facilities, restaurants and special event areas. (*Id.*, pp. II-15-16) The DEIR further provides that the Specific Plan will allow “all other permitted uses in the C2 zone unless expressly prohibited in the Specific Plan.” (*Id.*, p. II-16) Permitted uses in the C2 zone include, for example, auditoriums with a seating capacity of up to 3,000 people, billiard and pool halls, baseball or football stadiums or boxing arenas with seating capacity of up to 3,000 people, churches, circuses or amusement enterprises, medical or dental clinics and laboratories, hospitals, sanitarium or clinics, etc.

The DEIR does not explain which of these and the numerous other permitted uses in the C2 zone will be prohibited in the Specific Plan, and instead cryptically states that “[t]he specific mix of uses ultimately constructed will depend on market demands, and the Specific Plan would allow flexibility in locating the various uses within the Project Site.” (*Id.*, pp. II-13, IV.K-42) Moreover, the public cannot review the Specific Plan to find this information because it remains unavailable to the public.

For all of these reasons, the public really has no idea of what uses would actually occur on the Project Site following the adoption of the Specific Plan.

- ¹¹ The DEIR distinguishes motion picture studios from television studios. Would a motion picture studio have greater impacts than the television studio that is analyzed in the DEIR? In particular, would outdoor production activities for motion pictures generate more significant noise impacts on Broadcast Center and other nearby sensitive receptors than a television studio?

Response to Comment No. 35-19

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 regarding the permitted uses on-site that are proposed to support the continued operation of the Project Site as a studio. Refer also to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, for clarifications to Section II, Project Description, of the Draft EIR related to the permitted uses on-site, which specifically remove references to all C2 zone uses (even though these uses are currently permitted).

With respect to the comment regarding distinguishing “motion picture studios” from “television studios,” the Draft EIR evaluated outdoor production activities associated with various types of studio uses, including motion picture, television, and broadcast studio uses that currently occur within the Project Site and would continue to be permitted in the future, with the most impactful land use category analyzed as appropriate. Refer to the Maximum Impact Scenarios included as Appendix FEIR-3 of this Final EIR. Also refer to Response to Comment No. 26-146 regarding the noise analysis conducted for outdoor production activities.

This comment incorrectly claims that the sentence in the Draft EIR regarding the mix of uses and market demands concerns other uses that would be permitted. Rather, as discussed in Response to Comment Nos. 9-13 and 26-16, the mix of uses refers to the five studio uses, and the exact size and timing of construction of such uses would be based on market demands.

Comment No. 35-20

With respect to design and architecture, the DEIR references “design standards” and “design requirements” in the Specific Plan, but it does not state them, except that new

development “would embrace the mid-century modern legacy established by Pereira & Luckman and be compatible with the architectural elements of the HCM.” (*Id.*, p. II-17) The reader, however, has no idea of the substance of those design standards and design requirements without the Specific Plan in hand to review. Similarly, the “Other Design Elements” section of the DEIR states that the Specific Plan would also include “design regulations that address screening of rooftop equipment and outdoor storage areas, fencing, parking structures and Project Site access points,” but only provides a few examples of those proposed regulations, resulting in yet more uncertainty, on top of not knowing the location, appearance, configuration and massing of any potential project building. (*Id.*, p. II-22)

Response to Comment No. 35-20

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 35-5. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA. As discussed in Response to Comment No. 9-17, the design standards and more detailed design information are not necessary for the CEQA environmental analysis of the Project.

Comment No. 35-21

The project description also includes a Conceptual Open Space and Landscape Plan in Figure II-6. (*Id.*, p. II-24) The preparers of the DEIR were less careful here, so the DEIR does not expressly state that this plan “illustrates one possible open space and landscape scenario,” but the inclusion of the word “Conceptual” in the name of the plan presumably means that. Therefore, the reader has no idea where the actual open space and landscaped areas would be developed on the Project Site as part of the Project. The DEIR includes rosy, generic language that “landscaping and open space elements would be used to unify the various building types, programs and activities on the Project Site through cohesive plant palette,” and “planting zones and associated pallets would be established to define streetscape areas, gateways and major Project site Entrances, production areas, bungalows, and rooftop terraces,” but includes no information or illustration as to what any of that would look like. (*Id.*, p. II-23) In particular, the Conceptual Open Space and Landscape Plan may include a very thin band of landscaping adjacent to the western boundary of the BC Site (it is very hard to tell and does not match up with any of the “Keys” [G1–G7]), but otherwise no landscaping at all is even conceptually required along the multiple boundary lines shared by the Project Site and the BC Site.¹²

¹² As is the case for so many aspects of the Project, the Application Plans includes detailed conceptual landscaping information that is absent in the DEIR. For example, the Application Plans include an “Illustrative Tree Plan” that shows the potential location of 19 types of trees, “Illustrative Planting Zones” and a detailed “Illustrative Planning Palette.” While Hackman would not be bound by any of those “illustrative” plan sheets, why would this information be omitted from the DEIR when it already existed

and was linked to the Conceptual Open Space and Landscape Plan that appears in both Figure II-6 in the DEIR and as a plan sheet in the Application Plans?

Response to Comment No. 35-21

Both the Conceptual Site Plan provided in Figure II-4 and the Conceptual Open Space and Landscape Plan provided in Figure II-6 of the Draft EIR are consistent and based on the application materials submitted to the City by the Applicant. The Project would include implementation of open space and landscaped areas consistent with these figures. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of how the Draft EIR disclosed and analyzed all of the elements of the Project required by CEQA. Refer to Response to Comment Nos. 16-47 and 26-E.1-11 regarding how the Project is consistent with applicable plans and policies related to open space. Precise landscape plans are details that are not currently available and are not required to be included as part of an EIR for a specific plan project.

Comment No. 35-22

The DEIR project description also states that “some” of the project buildings may include rooftop terraces or decks it would serve as outdoor gathering spaces, and that this use would be permitted from 7 A.M. to 12 A.M. (*Id.*, p. II-23) However, the DEIR provides no clue as to the actual locations of these rooftop areas and they could potentially be at the top of every new building, including buildings constructed as little as 30 feet away from Broadcast Center.

Response to Comment No. 35-22

Refer to Response to Comment No. 26-135 regarding the outdoor gathering noise analysis.

Comment No. 35-23

The project description further claims that vehicular and pedestrian access “would” be provided as shown in Figures II-7 and II-8. (*Id.*, pp. II-26–28) However, the names for Figures II-7 and II-8 are “**Illustrative** Vehicular Site Access” and “**Illustrative** Pedestrian Site Access.” It therefore appears that vehicular and pedestrian access points could be located anywhere on the Project Site, so that the public has no idea how the Project’s access and internal traffic circulation would actually work, and would not have any idea until Hackman seeks building permits for specific development projects after the adoption of the Specific Plan. At that point, however, no CEQA review would be required with respect to the ministerial approval of building permits.

As previously discussed, the DEIR relatedly states that the Project “would incorporate a multi-level circulation plan” which includes two primary production levels—the at-grade production activity level and the below-grade product operations level—that “would provide access, staging, storage, and conductivity between active production and supporting uses.” (*id.*, pp. II-25–26) However, the DEIR provides no concrete information as to where these production levels, each of which could potentially cover the entire Project Site, would be located or how they would actually “connect” to the rest of the Project. Even the “illustrative” vehicular site access graphic in Figure II-7 and the DEIR Conceptual Plan in Figure II-4 entirely omits the two production levels.

Response to Comment No. 35-23

The proposed vehicular and pedestrian access points are shown in the Conceptual Site Plan (Figure II-4), as well as in Figures II-7 and II-8 in Section II, Project Description, of the Draft EIR. Refer to Response to Comment No. 16-11 regarding the Project’s multi-level circulation plan, which is discussed on pages IV.K-42 to IV.K-44 in Section IV.K, Transportation, of the Draft EIR. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. Please note that any plan, including the vehicular and pedestrian access plans shown in the Conceptual Site Plan, included in an EIR or other CEQA document is inherently conceptual, and plans would be finalized during the building permit process, which occurs after a project is approved and its EIR certified. As discussed in Topical Response No. 1, the Draft EIR fulfilled CEQA’s informational purpose by disclosing all the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

The intent of the internal access and circulation system is to allow a vehicle or pedestrian to enter the Project Site from any of the Project driveways or security gates and be able to travel to any destination or parking area within the Project Site. Figure 2B on page 13 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the basic form of the circulation system. North-south roadways would be provided west of the Primary Studio Complex and as an extension of Genesee Avenue. Vehicles and pedestrians would be able to enter the Project Site on Beverly Boulevard, Fairfax Avenue and The Grove Drive and drive or walk to other areas of the Project Site.

The comments regarding internal circulation and access do not concern the CEQA analysis in the Draft EIR. Nevertheless, this comment will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 35-24

The project description next asserts that the Project “would” include an onsite “Mobility Hub,” as depicted in Figure II-9, that would support first/last mile connections, encourage public transit and ride-sharing and support transportation demand management strategies. (*Id.*, p. II-26) However, the Mobility Hub is another hazy project component. The name for Figure II-9 is “**Conceptual** Mobility Hub,” which connotes that the Mobility Hub could be very different from what is shown on the rendering. More fundamentally, Hackman has not proposed a concrete development project with plans that include the suggested Mobility Hub, nor does the DEIR indicate that the Mobility Hub requirements would be included in the still-unseen Specific Plan. Moreover, the reader has no idea where the Mobility Hub would be located because the DEIR text does not disclose that and the DEIR Conceptual Plan does not include any specific information regarding any potential use, so that the public has no opportunity to comment on whether a particular proposed location would be appropriate. Broadcast Center believes that it would be highly inappropriate to place the Mobility Hub in close proximity to its apartment building, but it currently has no idea if Hackman would attempt to do that since the Mobility Hub could be located anywhere on the Project Site.

We note that Hackman and the City have provided clues as to where the Mobility Hub might be located. While the DEIR Conceptual Plan does not disclose the potential location of the Mobility Hub, Figure IV.K-3 (Vehicular Project Site Access) in the DEIR includes a reference to “Mobility Hub (Ground Level)” in the southwestern corner of the Project Site.¹³ (DEIR, p. IV.K-43) Even this reference, however, is quite confusing. The text right below “Mobility Hub (Ground Level)” states “(N) STAGE,” which indicates that a new sound stage would be constructed at that location, which also appears to be at “ground level.” The Floor Plan-Level BI sheet in the Application Plans may reconcile this contradictory text. It indicates that the Mobility Hub could be located below grade adjacent to production basecamp and production support areas. But this information, illustrative or otherwise, is nowhere to be found in the DEIR.

What all of this further demonstrates is that Hackman has apparently already formulated a specific development project, including the location of the Mobility Hub, and the Project Application and DEIR includes bits of information and discussion that reflect this, but the project description in the DEIR nonetheless omits basic and specific information regarding the project components and their location. Moreover, it forces the reader to engage in serious detective work to try and figure out the potential locations of those improvements, including the Mobility Hub, that Hackman may have in mind.

¹³ Figure IV.K-3 includes the same conceptual layout as the DEIR Conceptual Plan in Figure 11-4. Figure IV.K-3 provides minimal text descriptions for each of the white boxes (e.g., stage, office, north parking structure, southeast parking structure, public retail and the Mobility Hub), as well as the widths of the potential internal streets, but the DEIR Conceptual Plan inexplicably omits even that limited information.

Even the Conceptual Site Plan sheet in the Application Plans includes this basic information, although a comparison of that plan sheet and Figure IV.K-3 reflects that the illustrative conceptual plan was modified in several respects between May 2021 and the release of the DEIR in July 2022. **Why would the DEIR deprive the reader of the most basic information regarding the one illustrative scenario that forms the basis of much of the project description and the subsequent environmental analyses when that information actually exists elsewhere in the DEIR?**

Response to Comment No. 35-24

Refer to Topical Response No. 7, Mobility Hub, for a more detailed discussion of the function and location of the Mobility Hub. As discussed therein, City guidance provides flexibility regarding the proposed location and functions of the Mobility Hub. Nevertheless, the primary Mobility Hub functions and location are proposed in the southwest corner of the Project Site, near the intersection of Fairfax Avenue and 1st Street, as shown in the Conceptual Site Plan in the Draft EIR. This location provides a direct connection to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction, and this location would also be consistent with a possible northern extension of the Metro K (Crenshaw) Line along Fairfax Avenue. The Fairfax Avenue corridor has a high concentration of pedestrian destinations and direct access to the Metro D (Purple) Line Wilshire/Fairfax Station, so it would be beneficial and logical to locate the transit functions in this area. While the primary location for the Metro D (Purple) Line shuttle bus service will likely remain in the southwest portion of the Project Site, a portion of the bicycle, rideshare, and visitor drop-off functions may be distributed across the Project Site to directly link mobility uses with primary destinations.

Topical Response No. 7 also contains a commitment that the Project would not operate bus loading/unloading in an open-air setting within 75 feet of the Broadcast Center apartments. Project Design Feature TR-PDF-2 has been revised to include this commitment; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the proposed development program. Notably, the Conceptual Site Plan is based on the architectural plans on file with the City. These plans are part of the administrative record and have been publicly available on City Planning's website, as evidenced by this comment. Please note that any site plan included in an EIR or other CEQA document is inherently conceptual, and plans are finalized during the building permit process, which occurs after a Project is approved and its EIR certified. The Draft and Final EIRs for the Project provide the detail required by CEQA. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA

compliance review. Refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website for this Project (<https://planning.lacity.org/development-services/eir>).

Comment No. 35-25

The DEIR project description then states that the Project would include approximately 5,300 parking spaces, and that the various uses would require 1–3 parking spaces per 1000 square feet of floor area. (DEIR, p. II-30; see *also* p. IV.K-44) However, the project description does not disclose the location of any of these parking spaces, nor does the DER Conceptual Plan even illustrate their potential location.¹⁴ Furthermore, while unexplained in the project description, the DEIR's transportation analysis states the calculation of the required parking spaces is not based on LAMC parking rates, but rather on three parking rates in the unseen Specific Plan—two spaces/1,000 square feet for retail uses and all other uses permitted under the Specific Plan (excluding soundstages, production office in general office uses), 2.5 spaces/1,000 square feet for sound stage uses, and three parking spaces/1000 square feet for production office and general office uses. It appears that no parking spaces are required for basecamp areas or any of the other uses on the two production levels. (*Id.*, p. IV.K-44) On their face, these parking rates contradict the range of 1–3 parking spaces/1,000 square feet stated in the project description. In any event, the DEIR fails to explain why the Specific Plan parking rates deviate from the applicable LAMC parking rates, while at the same time claiming, with no evidentiary support, that “the Project would provide sufficient on-site parking to meet the needs of employees and visitors at the Project Site.” (*Id.*, p. IV.K-46)

In addition, (1) the parking spaces may be located anywhere on the Project Site or at offsite locations at undisclosed distances from the Project Site, (2) the Specific Plan includes an unspecified process for reduced/shared parking and (3) temporary offsite parking due to displacement resulting from production filming and related activities may be provided with shuttle service to the Project Site. (*Id.*, p. II-30; see *also* p. IV.K-44)

As a result, the reader has no idea whether the proposed 5,300 parking spaces are sufficient to meet the parking demands associated with buildout of the Project, where any of the onsite or offsite parking spaces would actually be located, or how the location of the parking spaces would relate to the internal circulation system (which itself is unknown). For example, Hackman could develop a large parking structure 30 feet from the BC Site's western boundary. It could also choose to provide substantial offsite parking adjacent to nearby schools and other sensitive receptors. This is consistent with the statements in the project description that “ultimately parking may be located throughout the Project Site [and offsite], provided that the Specific Plan's requirements are met,” so that “parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces.” (*Id.*, pp. II-30, IV.K-44)

In addition, the project description fails to explain (1) whether the proposed 5,300 parking spaces include spaces for employees and visitors who would be part of live studio audiences for television shows and attend other events on the Project Site and, if so, how the number of required spaces was calculated, and (2) why no parking spaces whatsoever are required for the commercial activity that would occur within the two production levels. It also fails to disclose how often the “temporary” displacement of parking spaces due to production filming is anticipated to occur or to what extent it would occur.

Moreover, the project description falsely states that “the conceptual site plan [*i.e.*, the DEIR Conceptual Plan in Figure II-4] illustrates specific parking locations. (*Id.*) In fact, it does not. Hundreds of pages later in the DEIR, Figure IV.K-3 (Vehicular Project Site Access) includes the potential locations of a “Southeast Parking Structure” and a “North Parking Structure,” but, as the project description states, the parking can be located anywhere on the Project Site or offsite.

¹⁴ While the DEIR Conceptual Plan does not disclose the potential location of any parking structure, either below grade or above grade, Figure IV.K-3 (Vehicular Project Site Access) in the DEIR designates a large building in the southeastern corner of the Project Site as the “Southeast Parking Structure” and it would apparently be an above-grade parking structure. Since this building is the central building shown in Height Zone B, and Height Zone B has a maximum height of 130 feet, it appears that Hackman contemplates a 130-foot-tall parking structure that would be 60 feet from the BC Site. Broadcast Center believes that is a highly inappropriate location for this enormous parking structure, given that it could easily be constructed elsewhere on the 25-acre Project Site and avoid the potentially significant air quality and noise impacts on Broadcast Center’s residents. Those air quality and noise impacts are discussed in subsequent sections of this letter.

Response to Comment No. 35-25

Pursuant to SB 743, the adequacy of a new development’s parking supply is not a CEQA consideration. (Pub. Res. Code § 21099, subd. (b)(3) [“the adequacy of parking for a project shall not support a finding of significance pursuant to this section.”].)

The Project parking locations are disclosed in the Conceptual Site Plan set forth in the Draft EIR. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the parking proposed for the Project and the operation of/access to the Project’s parking. As discussed therein, the parking provisions in the Preliminary Draft Specific Plan were developed based on employee and visitor (including audiences) populations to be served and the seasons of the year, times of the day and the days of the week that these populations will use the parking supply. These analyses determined the parking supply needed to allow the Project Site to provide sufficient parking on-site to meet the peak day Project demands and prevent spillover parking.

With respect to off-site parking, as discussed in Section B, Off-Site Parking, of Topical Response No. 13, Parking, the Project does not intend to implement an off-site

parking program or negotiate an agreement with the City regarding off-site parking. The Project does not need off-site parking to meet its peak parking demands and, therefore, is no longer proposing off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 35-26

The project description also discusses the proposed “Sign District” for the Project. (*Id.*, pp. II-31–32) In the City, a sign district for a specific project site is normally established pursuant to an ordinance that establishes specific sign standards for the site that override the sign standards and requirements in the LAMC. However, the City did not make the draft sign ordinance available to the public on or before the commencement of the public comment period for the DEIR, and it remains unavailable as of today, the end of the public comment period. In addition, the project description generally states that the ordinance would allow a total of approximately 31,375 square feet of signage along the perimeter of the Project Site, but includes no illustrations or descriptions of any of the specific contemplated signs.

The project description further states that “unlimited signage could occur within the “interior” of the Project Site, which is almost the entire Project Site. (*Id.*) For example, unlimited signage at any height could be placed 30 feet from the western and southern boundaries of the BC Site. Signage would be limited within 30 feet of the BC Site, but that is likely an empty gesture given that Hackman apparently intends to construct a 30-foot-wide private street adjacent to the western boundary of the BC Site and a 60-foot-wide private street along the southern boundary of the BC Site. (*Id.*, p. IV.K-43 [Figure IV.K-3])

Response to Comment No. 35-26

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-10, 9-26, and 26-129 regarding the proposed Sign District. As discussed therein, the application for the proposed Sign District was submitted in accordance with the requirements of the LAMC, the Preliminary Draft Specific Plan ordinance was not required to be included as part of the Draft or Final EIR, the physical aspects of the proposed signs included within the Preliminary Draft Specific Plan are described in the Draft EIR, and specific sign limitations have been proposed for interior signs and signs along the Shared Eastern Property Line near the Broadcast Center Apartments. Refer to Response to Comment No. 35-16 regarding the inaccurate statements in this comment regarding “private street[s]”.

Comment No. 35-27

Finally, the project description includes three different truck routes for construction deliveries and haul trucks. (*Id.*, pp. II-34-35) However, the DEIR does not explain whether one or all of these routes would or could be used. Furthermore, these routes are described as “optional routes,” which suggests that other, undescribed truck routes may be used. (*Id.*, p. II-34)

Relatedly, footnotes 14, 15 and 16 in this discussion restate the three optional routes actually recommended by LADOT. This suggests that the optional routes that LADOT recommended are different from the routes described in the main DEIR text, but the DEIR declines to explain those differences. As a result, the reader is forced to compare the footnote description with the text description to determine those differences. (*id.*, pp. II-34-35; see *also* pp. IV.A-60-61, IV.I-35-36)

And they are indeed different in an important respect. All three options in the main DEIR text state that empty trucks would access the Project Site from Beverly Boulevard and loaded trucks would exit the Project Site from Beverly Boulevard. However, the three footnotes state that LADOT actually recommended that trucks enter and exit Beverly Boulevard **at the existing Genesee Avenue signal**. Therefore, based on LADOT’s recommendations, construction trucks would have to enter and exit the Project Site a substantial distance from Broadcast Center, while the stated options in the main text would allow trucks to enter and exit the Project Site immediately adjacent to Broadcast Center, including large trucks exiting the site that are filled with excavated dirt. Why have Hackman and the City apparently decided to disregard the LADOT recommendations and why has the DEIR been prepared in a way that makes it extremely difficult to discern this distinction?

Response to Comment No. 35-27

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes. Each of the three haul routes was adequately disclosed and evaluated in the Draft EIR and was approved by LADOT. Note that the haul routes described in Section II, Project Description, of the Draft EIR have been revised to fully match the text from LADOT; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The changes pertain only to entry/exit points to and from the Project Site and do not affect any analysis or impact conclusion in the Draft EIR.

Comment No. 35-28**2. The Project Description Is Neither Accurate, Finite Nor Stable.**

The project description in an environmental impact report (“EIR”) “must be accurate, stable and finite.” *Millennium*, 39 Cal. App. 5th 1, 16 (2019). An accurate and stable project description is the sine qua non of an informative and legally sufficient EIR. *Kings County*, 221 Cal. App. 3d at 739. The courts have long held that “[a] curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefits against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal and weigh other alternatives in the balance.” *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 192-193 (1977). In other words, without an accurate, stable and finite project description, the entire EIR is rendered inadequate.

For the many reasons discussed at length in the preceding section, the project description in the DEIR utterly fails to satisfy these requirements. The project description is merely a potpourri of illustrative scenarios, conceptual plans and ranges of options, none of which may occur. The open-ended, inaccurate and indefinite project description fails to describe the Project at all. While the DEIR, Project Application and PowerPoint presentation to the Cultural Heritage Commission telegraph that Hackman has a specific development project in mind and at some point developed concrete plans, it has chosen to largely cloak its intentions and deprive the public of any meaningful information regarding the Project.

Based on the DEIR, the public has no idea where new project buildings, private streets, parking structures, production levels, landscaping, open space or signage would be located, what their general design and relationship to one another would be, or over what period of time they would be constructed. The DEIR Conceptual Plan includes nothing more than white boxes and the general location of private streets, but that plan merely “illustrates one possible development scenario” among an infinite range of development options. The DEIR presents a blurred view of the Project and Hackman could build something that bears no resemblance to the DEIR Conceptual Plan, the Application Plans or any graphic illustration in the DEIR.

Similarly, the project description provides no concrete information as to what uses would be located in which portions of the Project Site. Moreover, while the DEIR Conceptual Program in Figure II-2 includes three types of studio uses, along with general office and retail uses, the DEIR states that the Specific Plan would in fact allow any permitted use in the C2 zone, and the public is in the dark as to which uses Hackman will select and in which buildings on which portions of the Project Site those uses would be located.

Response to Comment No. 35-28

This comment summarizes preceding comments in this comment letter that are fully responded to. As demonstrated in the responses to the preceding comments, including Response to Comment Nos. 35-4 through 35-27, the Project Description is accurate, stable, and finite. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a more detailed discussion of how Section II, Project Description, of the Draft EIR fully complies with CEQA and is distinguishable from the project description at issue in *Millennium*. Also refer to Response to Comment No. 9-11 regarding the *Inyo* case cited in this comment.

Comment No. 35-29

The DEIR's project description incorporates or generally references development regulations that apparently will be included in the as-yet unseen Specific Plan, but those regulations, whatever they may be, provide the public and decisionmakers with little actual information regarding an actual, concrete development scenario. Rather, they will simply limit to some unknown extent the range of construction choices for Hackman or another developer. Moreover, as previously discussed, the limits imposed are often vague, ambiguous or contradictory.

In short, the project description fails to describe in concrete terms the siting, size, mass, appearance or use of any building, structure, street or landscaping proposed to be built or planted on the Project Site. Rather, it presents a single conceptual scenario that itself is virtually devoid of information. Whatever this conceptual scenario is, Hackman has no obligation to follow it, and it does not meet the requirement of a stable or finite project.

It is therefore bewildering for the DEIR to state, among many examples, that the unseen Specific Plan "would establish a clear and cohesive development framework for the entire Project Site, serving to integrate the proposed mix of permitted land use..." (DEIR, p. II-12), and that the Specific Plan results in "visual and physical integration of the proposed land uses" (*id.*, p. V-48). Undeniably, the reality is the precise opposite.

Response to Comment No. 35-29

This comment summarizes preceding comments in this comment letter that are fully responded to. Refer to Response to Comment Nos. 35-4 through 35-7, above. As demonstrated in the responses to the preceding comments, Section II, Project Description, of the Draft EIR is accurate, stable, and finite and complies with CEQA. Refer to Response to Comment Nos. 5-3 and 26-5 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, with regard to the proposed Specific Plan and Response to

Comment Nos. 5-3 and 9-13 regarding the physical aspects of the Project included in Section II, Project Description, of the Draft EIR, including the Conceptual Site Plan.

Comment No. 35-30

In addition, as discussed in more detail in Section II.C, *infra*, the DEIR states that the Specific Plan places an upper limit on the square footage of new construction on the Project Site, but this cap is based on a definition of “floor area” that significantly deviates from the LAMC definition of “floor area” and thereby excludes at least several hundred thousand square feet of enclosed spaces where production activities would occur, including the two proposed “production levels.” This results in an inaccurate project description.

Response to Comment No. 35-30

This comment is similar to Comment No. 35-6. Refer to Response to Comment No. 35-6 for a discussion of the floor area identified for the Project.

Comment No. 35-31

Furthermore, the inchoate project description makes it impossible for the public to participate meaningfully in the CEQA process. In particular, Broadcast Center cannot begin to know what Hackman may eventually choose to develop in close proximity to the Broadcast Center building and how that would impact its residents. Would Hackman decide to construct one or more 160-foot buildings with rooftop areas just a few feet from the western boundary of the BC Site, with a private street in between that is designed to accommodate truck traffic? Would Hackman elect to place significant signage on the eastern sides of those buildings, which it has an unlimited right to do? Would Hackman design the internal circulation system and vehicular access points for the Project in a manner that maximizes the traffic impacts on The Grove Drive and impairs access to, and operation of, Broadcast Center, including resident move-ins and the retail uses on the ground floor? Would Hackman construct offsite parking structures at locations that further exacerbate the Project’s traffic impacts and potentially impact Palazzo West or East? Would Hackman choose to place the Mobility Hub or a parking structure¹⁵ adjacent to the western boundary of the BC Site, which would also significantly impact Broadcast Center residents? Would Hackman allow intrusive outdoor production activities in proximity to Broadcast Center, the noise impacts of which could significantly impact residents? The DEIR does not, and as structured cannot, provide answers to any of these questions or similar questions regarding the Project’s impact on The Grove or the Farmers Market. It therefore fails as an informational document and precludes informed decisionmaking and public participation.

¹⁵ Indeed, one of the project alternatives does feature a six-level, above-grade parking structure adjacent to the BC Site. (DEIR, p. V-33 [Figure V-3])

Response to Comment No. 35-31

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a discussion of the adequacy of the Project Description provided in Section II, Project Description, of the Draft EIR. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. Contrary to the commenter's assertion, the Project Description includes all information required by CEQA and fulfills CEQA's purpose as an informational document that allows for meaningful public participation.

In terms of access on The Grove Drive, the Transportation Assessment in Appendix M.1 of the Draft EIR already shows the maximum potential effects of Project vehicles on that roadway and, therefore, the maximum potential effects on the Broadcast Center Apartment driveways along The Grove Drive. Please note that the Broadcast Center Apartments and its grocery store tenant adversely impact the operation of The Grove Drive by:

- a. Ignoring the red curb along the east side of The Grove Drive south of Beverly Boulevard and instead using that red curb area as a de facto loading zone for the grocery store and blocking the westbound to southbound dual left-turn lanes entering The Grove Drive and extending the traffic queue into the Beverly Boulevard/The Grove Drive intersection;
- b. Operating a valet parking system that extends the queue of vehicles accessing the parking structure into the southbound lanes of The Grove Drive and blocking the street; and
- c. Allowing grocery store employees to utilize the curb parking along the west side of The Grove Drive as all-day employee parking.

With respect to off-site parking, as discussed in Section B, Off-Site Parking, of Topical Response No. 13, Parking, the Project does not intend to implement an off-site parking program or negotiate an agreement with the City regarding off-site parking. The Project does not need off-site parking to meet its peak parking demands and, therefore, is no longer proposing such a program. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR. Thus, the Project would not have any off-site parking impacts on Palazzo East or Palazzo West.

The Conceptual Site Plan includes a 30-foot frontage area along the Shared Eastern Property Line, which includes an internal circulation path. Please note that the assertion that the Project includes a “private street” is incorrect. Rather, the Project would include internal circulation paths, as is typical for any development. As discussed in Response to Comment No. 26-141, only approximately 4 trucks per day would use the Beverly Boulevard driveway immediately to the west of Broadcast Center Apartments.

Refer to Response to Comment No. 26-7 regarding building heights to the west of Broadcast Center Apartments.

Refer to Response to Comment No. 35-24 above for a discussion of the location of the Mobility Hub. Topical Response No. 7, Mobility Hub, also presents a commitment to limit loading/unloading of buses in an open-air setting within 75 feet of the Broadcast Center without a noise barrier in place. This commitment has been included as a PDF as set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

With respect to “the Project’s impact on The Grove or the Farmers Market,” the commenter has made no specific claim as to what impacts are allegedly left unaddressed, so no response can be provided.

Refer to Response to Comment No. 26-135 regarding how noise levels associated with rooftop areas would be less than significant at the Broadcast Center Apartments. Regarding outdoor production activity, in accordance with Project Design Feature NOI-PDF-5, outdoor production activities will continue to be prohibited within 200 feet of the Shared Eastern Property Line between the hours of 10 P.M. and 7 A.M. In addition, Response to Comment No. 16-102 also discusses how noise associated with outdoor production activities would be less than significant at the Broadcast Center Apartments.

With regard to signage, refer to Response to Comment No. 5-10 and page II-31 of Section II, Project Description, of the Draft EIR. As discussed therein, signage in the vicinity of the Broadcast Center Apartments would be limited.

Comment No. 35-32

Relatedly, the project description fails to include a general description of the Project’s technical, economic and environmental characteristics, as required by Section 15124(c) of the Guidelines. The DEIR does not contain a concrete site plan, cross-sections, building elevations or illustrative massing to show what buildings and structures would be built, where they would be built, what they would look like or how many there would be.

Response to Comment No. 35-32

This comment is similar to Comment No. 9-12. Refer to Response to Comment No. 9-12 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project fully complies with Section 15124(c) of the CEQA Guidelines.

Comment No. 35-33

Moreover, there is no practical impediment as to why Hackman could not have provided an accurate, stable and finite project description of what it intends to build. As previously discussed, it is apparent that Hackman has already prepared concrete development plans, but has simply chosen not to disclose them in the DEIR or base the environmental analyses on them. The DEIR suggests that the nebulous project description is required to account for future market demands (DEIR, p. 11-13), but uncertainty about market conditions is an insufficient ground for the DEIR's incoherent and ambiguous project description. See *Millennium*, 39 Cal. App. 5th at 14.

Response to Comment No. 35-33

This comment repeats comments related to the adequacy of the Project Description. Refer to Response to Comment Nos. 35-4 through 35-7 in this letter; Response to Comment Nos. 5-3, 11-12, and 26-11 above; and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding how the Project Description of the Draft EIR is accurate, stable, and finite and is distinguishable from the project description at issue in the *Millennium* case.

Comment No. 35-34

In addition, it appears that, for the most part, no additional CEQA review would be required when Hackman proposes an actual development project or projects. In this regard, the DEIR's project description states as follows:

Specific proposals for development that involve a land use exchange would require a review by the Director of... Planning. This process would entail a determination of whether the development proposal complies with the Specific Plan regulations and mitigation measures set forth in the Mitigation Monitoring Program for the Project and whether the environmental impacts resulting from the proposed development would be within the envelope of impacts identified in this Draft EIR. Throughout this Draft EIR, where appropriate, the analyses address the potential impacts resulting from a hypothetical development mix under the proposed land-use exchange program that would generate the maximum impact for that environmental

issue. Accordingly, the maximum possible impacts of the Project are evaluated herein and represent the measure against which future land use exchange proposals must be considered. (DEIR, pp. II-16-17)

Let us unpack that statement. First, it indicates that no further environmental review under CEQA would occur if a land use exchange is **not** required. It is quite possible that Hackman would not require **any** land use exchange, in which case no additional CEQA review would occur.

Moreover, if Hackman develops the Project in phases, as the DEIR repeatedly states it may do, then if a land use exchange was required at all, it would likely only be required in a later project phase. For example, the total permitted floor area of sound stages is 350,000 square feet, but Hackman has the right to increase the sound-stage floor area to 450,000 square feet. (*Id.*, p. II-16) It is reasonable to assume that Hackman would not include more than 350,000 square feet of sound stages in earlier project phases, but might decide to expand the sound stage use in later project phases, or the last project phase. Furthermore, given that four of the five uses for which land use exchanges are permitted (sound stage, production support, production office and general office) are all studio-related and do not generate significantly different environmental impacts, it is likely that the Director of Planning would determine that the land use exchange would not result in environmental impacts outside the envelope of impacts discussed in the DEIR, particularly given that DCP has already endorsed the preparation of an EIR that does not include an accurate, stable or finite project description. Finally, the statement strongly suggests that the public would have no right to participate in this process, further defeating the informational goals of CEQA. For all of these reasons, no meaningful CEQA review would occur even if a specific development proposal required a land use exchange.

This statement, and others in the DEIR, also reflect that the City and Hackman believe the use of a development envelope for the Project, in lieu of a concrete development project, is acceptable for CEQA purposes because the DEIR allegedly analyzes the Project's "maximum possible impacts" or "maximum impacts." However, numerous courts have "roundly rejected" that argument. *Millennium*, 39 Cal. App. 5th at 18." CEQA's purposes go beyond an evaluation of theoretical environmental impacts. "If an EIR fails to include relevant information and precludes informed decisionmaking and public participation, the goals of CEQA are thwarted and a prejudicial abuse of discretion has occurred." *Id.*

Furthermore, the DEIR's impact analyses do not analyze worst-case impacts, as discussed in Section II.C, *infra*, and subsequent sections of this letter. To the contrary, the inaccurate, unstable and contradictory project description wreaks havoc with the DEIR's impact analyses because it is impossible to adequately analyze a proposed project when most of its characteristics are unknown.

Response to Comment No. 35-34

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5, 9-12, and 9-13, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Also refer to Response to Comment No. 9-13 and Topical Response No. 1 regarding the limited land use exchanges that would be permitted.

With regard to the comments about maximum impacts and "worst case" analyses, refer to Response to Comment Nos. 9-14 and 26-11 and Topical Response No. 1. As discussed therein, the Draft EIR's environmental analysis accounts for the maximum potential environmental impacts associated with buildout of the Project as set forth in Table II-2 of the Draft EIR. In addition, the Draft EIR also analyzes the maximum impact scenarios (i.e., the development scenarios under the limited Land Use Exchange Program that would generate the greatest environmental impact). Refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic in addition to the proposed development program as set forth in Table II-2 of Section II, Project Description, of the Draft EIR.

With regard to the statement about the Department of City Planning, the Los Angeles Department of City Planning is the Lead Agency for the Project and has directed the preparation of the EIR. As such, the Department of City Planning has concluded that Section II, Project Description, of the Draft EIR is indeed accurate, stable, and finite. Please note that the Project has not been approved. As discussed in Response to Comment No. 32-3, public noticing of the Project has been conducted in compliance with CEQA. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeded the typical 45-day period required under CEQA. Following the publication of this Final EIR, the Project approvals and EIR will be considered during public hearings and meetings before City decision-makers prior to any approval, where the public will have additional opportunities to comment on the Project.

Comment No. 35-35**C. The DEIR Does Not Analyze the Project's Maximum Possible Impacts.**

Some of the ways in which the DEIR fails to analyze the Project's maximum possible impacts apply to many or most of the DEIR's impact analyses and others relates to specific impact analyses.

First, the impact analyses ignore a host of permitted uses on the Project Site. As previously discussed, the impact analyses generally consider only the uses described in the DEIR Conceptual Program in Table II-2, which are limited to sound stages, production support, production office, general office and retail.

Elsewhere in the project description, however, the DEIR states that the Specific Plan will include numerous other uses, including, for example, museum exhibits and theaters, child care and educational facilities, fitness facilities, mills/manufacturing, sleeping quarters, recreational facilities, restaurants and special event areas. (*Id.*, pp. II-15–16) Moreover, the DEIR states that the Specific Plan will allow “all other permitted uses in the C2 zone unless expressly prohibited in the Specific Plan, which include uses as varied and substantial as auditoriums and baseball or football stadiums with a seating capacity of up to 3,000 people, hospitals and churches.” (*Id.*, p. II-16) Hackman could include any of those uses as part of the Project.

The DEIR's failure to consider the environmental impacts associated with any of the permitted uses other than the five production-related uses in the DEIR Conceptual Program necessarily means that the DEIR does not analyze the Project's maximum possible impacts.

Response to Comment No. 35-35

With regard to permitted uses, refer to Response to Comment No. 5-6 and Topical Response No. 3, Permitted On-Site Uses, regarding the clarified list of studio-related uses that would be permitted on-site, which removed the C2 zone text referenced in this comment (even though these uses are currently permitted); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. However, it should be noted that the C2 zone quoted in this comment is inaccurate; specifically, the text after the comma that refers to “auditoriums and baseball or football stadiums with a seating capacity of up to 3,000 people, hospitals and churches” was not included in the Draft EIR. As discussed therein, childcare and fitness uses would be permitted as ancillary uses. Refer to Response to Comment Nos. 5-6, 26-14, 26-121, and 28-6 regarding the uses discussed in this comment. Also refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Appendix FEIR-3 of this Final EIR for details of how all of the on-site uses have been

accounted for in the impact analyses throughout the Draft EIR. As such, contrary to this comment, the Project's maximum impacts have been fully analyzed.

Comment No. 35-36

Second, as discussed in detail in Section II.D, *infra*, the DEIR omits impact-generating floor area, in particular the two planned production levels that could include in the neighborhood of 1,000,000 square feet of active project space, by arbitrarily omitting all of that space from the Specific Plan's definition of "floor area" and then using that artificially reduced floor area in various impact analyses. As one example, as discussed in Section II.E, *infra*, the DEIR's quantified analyses of the Project's air quality impacts are based on the Specific Plan's definition of floor area and therefore omit analysis of the air quality impacts associated with the two production levels.

Response to Comment No. 35-36

This comment is similar to Comment No. 35-6. Refer to Response to Comment No. 35-6 regarding the adequacy of the Project Description and how all of the proposed areas, uses, and activities have been accounted for in the impact analyses throughout the EIR. Also refer to Response to Comment No. 26-E.1-27 with regard to potential operational air quality impacts and how all of the on-site uses have been accounted for in the analysis.

Comment No. 35-37

Third, while the DEIR and supporting technical reports and modeling data state that the DEIR Conceptual Plan in Figure II-4 "illustrates one possible development scenario" and the DEIR Conceptual Program in Table II-2 represents just "one possible development scenario that could be developed," so that they in no way govern the development of the Project Site, at the same time the project description, impact analyses and supporting technical reports in the DEIR often expressly state and/or assume that the Project **would** be developed in accordance with the vague and nonbinding DEIR Conceptual Plan and DEIR Conceptual Program and that they reflect a worst-case development scenario, notwithstanding that the Specific Plan allows an infinite number of development options.

Response to Comment No. 35-37

This comment repeats comments mentioned elsewhere in this comment letter. Refer to Response to Comment Nos. 35-5, 35-13, 35-28, and 35-34 regarding the adequacy of the Project Description. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5, 9-12, and 9-13 regarding the Conceptual Site Plan, the regulatory process under the proposed Specific

Plan, and how Section II, Project Description, of the Draft EIR is not vague and fully complies with CEQA.

Comment No. 35-38

As just one of many, many examples, consider the transportation analyses in the DEIR. To start with, in describing the “relevant project characteristics,” the DEIR includes and references Figure IV.K-3 (Vehicular Project Site Access), which is the DEIR Conceptual Plan with additional information, including specific locations for sound stages, production support, office and retail buildings, parking structures, the width of new private streets, and vehicular access points (again, it is mystifying that the DEIR Conceptual Plan itself omits all of this additional information). (DEIR, pp. IV.K-41–44) While this graphic illustrates only one potential development scenario, the DEIR text often misleads the reader into thinking that this is the actual Project. It states that, as shown on Figure IV.K-3, “vehicular access **would** be provided via the nine vehicular access points....” It states that the Project “**would** incorporate a multi-level circulation plan” through the two production levels that “**would** provide access, state staging, storage, and conductivity between the active production and supporting uses,” notwithstanding that those production levels are not shown on Figure IV.K-3 or anywhere else in the DEIR or supporting technical reports.

The VMT (vehicle miles traveled) traffic analysis that follows is then based on the DEIR Conceptual Program in Table II-2, which appears tied to the DEIR Conceptual Plan. To calculate the Project’s VMT traffic impact, the DEIR utilizes the conceptual floor areas for the five categories of use in the DEIR Conceptual Program (sound stages, production support, production office, general office and retail) for input into the City’s VMT Calculator. This generated an average work VMT per employee of 6.7, which is less than the significance threshold of 7.6. The DEIR never explains, however, why or how this reflects the “maximum possible” VMT impact. Given the broad range of uses that would be allowed in the Specific Plan, there are untold combinations of uses that would exceed a work VMT impact of 6.7 and, for that matter, would exceed the significance threshold of 7.6.¹⁶

¹⁶ The DEIR proves this point. It looks at two scenarios involving potential land use exchanges. It discloses that, under Scenario 2, which involves an exchange of 350,000 square feet of sound-stage space for 350,000 square feet of production support space, the average work VMT per employee would increase from 6.7 to 7.6, which “would meet but not exceed” the significance threshold of 7.6. (DEIR, p. IV.K-77) However, the land use exchange allows similar exchanges that would further increase production support space and correspondingly decrease production office, general office and/or retail floor area. If such an additional exchange as part of Scenario 2 resulted in any further increase in the average work VMT per employee (which seems quite likely), the VMT impact would then exceed the significance threshold of 7.6 miles and result in a significant impact that is not acknowledged in the DEIR.

Response to Comment No. 35-38

The comment cites several particular Project features that are part of the Conceptual Site Plan, including specific locations for Project land uses and parking structures, the width of new internal circulation paths, locations of vehicular access points, and a multi-level internal circulation plan. However, none of these features directly relate to any CEQA transportation impact category, and, therefore, any change to those features with the Project upon final design would not affect the transportation impact conclusions presented in the Draft EIR. The Project design is required to be reviewed by the City for compliance with the proposed Specific Plan before construction permits are issued, as well as for compliance with general City standards where applicable.

Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the VMT analysis in Section IV.K, Transportation, of the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 11-17 and 26-154 regarding the Land Use Exchange Program and the Draft EIR's analysis of both the proposed development program and the maximum transportation impact scenarios. The comment incorrectly claims that the Draft EIR doesn't explain why the proposed development program VMT analysis represents the "maximum possible" VMT impact. In fact, the Draft EIR specifically claims that it *doesn't* represent the maximum possible VMT impact, which is why a separate analysis was conducted on page IV.K-77 of the Draft EIR of a land use program that does represent the maximum VMT impact (maximum transportation impact scenario 2). It is important to note that while this scenario, which generates higher work VMT per employee but does not result in a significant VMT impact, is technically permissible under the proposed Specific Plan and, thus, included to represent a worst-case VMT impact scenario, it does not represent a realistic development scenario because a balance of sound stages and production support uses are necessary for a functioning studio campus and in order to meet the Project objectives set forth in Section II, Project Description, of the Draft EIR.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 35-24 and 35-31 regarding the adequacy of the Project Description and the information and analysis provided in the Draft EIR.

Refer to Topical Response No. 3, Permitted On-Site Uses, for a discussion of permitted land uses and how the Project Site is assured to remain a studio use under the proposed Specific Plan.

Comment No. 35-39

The VMT analysis also fails to consider the VMT impact associated with the (1) two planned production levels where numerous employees would work substantial studio

activities would occur. (DEIR, Appendix M, pp. 122–123) and (2) substantial traffic trips associated with live studio audiences for many television shows because those uses are not included in the DEIR Conceptual Program.

Response to Comment No. 35-39

As discussed in detail in Topical Response No. 10, Trip Generation, trips associated with basecamp space (including the studio level and the below grade production levels) and studio audience visitors are inherent in the empirical trip generation rates that were used to estimate Project trips. As discussed in Topical Response No. 8, Vehicle Miles Traveled, the Project's daily trip generation estimate was a direct input to the VMT Calculator tool, and, thus, those trips were a factor in the VMT analysis.

Because the vast majority of the trips to and from the Project Site are generated by employees (studio audience trips represent a small percentage of the overall gross daily trip generation), the VMT analysis was conducted based on the Project serving as an employment destination. As discussed in detail in Topical Response No. 8, the VMT analysis followed guidelines from *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Governor's Office of Planning and Research, December 2018) and appropriately focused on home-based-work attraction trips for estimating work VMT per employee. When other trip types are a small component of overall VMT, the OPR Technical Advisory recommends that the focus of VMT reduction efforts should be on trips between home and work.

As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, the Draft EIR's analysis accounted for the potential physical environmental impacts of all proposed uses and activities, regardless of whether they are within the definition of floor area.

Comment No. 35-40

As a second example, several of the impact analyses, including construction air quality, construction noise and geology and soils analyses, assume that the grading and excavation for the Project would include 772,000 cubic yards of cut and export (as well as 50,000 square feet of imported fill), based on a maximum excavation depth of 45 feet. (See, e.g., *Id.*, pp. II-15, IV.A-59, IV.I-35, IV.D-19) These numbers are again apparently based on the DEIR Conceptual Plan and DEIR Conceptual Program. Hackman, however, is not bound by those concepts. It could decide to excavate to a depth of more than 45 feet to provide subterranean parking, or more subterranean parking, for certain buildings and/or for the stand-alone subterranean parking structure along Beverly Boulevard that is not designated as such in the DEIR Conceptual Plan, but is so designated—as the “North Parking Structure (Subterranean)” —in Figure IV.K-3. (*Id.*, p. IV.K-43) It could choose to

convert a portion of the above-grade parking structure contemplated across the street from the BC Site to below-grade parking, which would increase the amount of excavation at that location. It could decide to break up the permitted new construction into more buildings than shown on the DEIR Conceptual Plan and thereby increase the required amount of excavation and export. It could opt to build an entirely different project with different buildings at different locations with different parking requirements and different building designs that could require substantially more excavation than buildout under the DEIR Conceptual Plan. There is simply no way the preparers of the DEIR can possibly know that 772,000 cubic yards is the maximum cut and export that would occur with the development of the Project, so they therefore cannot know if the relevant impact analyses in the DEIR reflect the “maximum possible impacts.”

Many more examples of the DEIR’s failure to analyze the Project’s “maximum possible impacts” are discussed in following sections.

Response to Comment No. 35-40

Permitted development would adhere to the parameters set forth in Section II, Project Description, of the Draft EIR, as clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The maximum depth of excavation would be approximately 45 feet and the maximum export would be approximately 772,000 cubic yards. Should additional depth of excavation or additional export be required, further CEQA review would also be required. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan. As discussed therein, any substantial changes from the Project would require future discretionary City review and approval and additional CEQA review.

Comment No. 35-41

D. The DEIR’s Reliance on an Allegedly Modified and Artificial Definition of “Floor Area” in the Specific Plan Results in a Substantial and Unlawful Understatement of the Project’s Environmental Impacts.

Normally, the analysis in a draft EIR prepared for a project in the City is based on the various definitions and standards applicable to the relevant project site set forth in the LAMC. Here, however, Hackman has proposed the unseen Specific Plan, which would largely override the applicable zoning provisions in the LAMC. However, the preparers of the DEIR improperly use a modified and artificial definition of “floor area” to understate substantially the Project’s environmental effects.

Specifically, the DEIR analyzes numerous environmental impacts based on the definition of “floor area” in the proposed Specific Plan. LAMC Section 12.03 broadly defines “floor area” as follows:

The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, chdfs, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated the bicycle parking, space for landing and storage of helicopters, and Basement storage areas.

“Building” is defined in LAMC Section 12.03 as “any structure having a roof supported by columns or walls, for the housing, shelter or enclosure persons, animals, chattels or property of any kind.” In other words, the normal zoning definition of “floor area” is broadly defined to include all active uses in a structure that has a roof supported by columns or walls, except for parking.

The apparent definition of “floor area” in the Specific Plan, however, is far narrower and includes a much longer list of excluded areas. According to the DEIR, the Specific Plan definition of “floor area” will exclude all of the following activities that are not excluded from the LAMC definition of “floor area”: the area between the exterior walls and “exterior face” of a building; light courts; bicycle parking (covered); covered ground-floor storage areas; recycling or waste management equipment or machinery; areas related to the Mobility Hub; outdoor eating areas (covered or uncovered), Trellis and shade structures; canopies (covered); existing marquees and walkways (covered); outdoor production areas; buildings wholly constructed to house mechanical, plumbing, electrical or other co-generation and stormwater equipment; production trailers; **basecamp areas**; temporary uses; and sets/façades. (DEIR, pp. II-2 [n. I], II-13 [Table II-2, note a], emphasis added)

Based on this narrow definition of floor area, it appears that the DEIR omits two entire levels of production activities—the at-grade “production activity level” and the below-grade “production operations level.” (*Id.*, pp. II-25–26) The DEIR, however, provides almost no information regarding these two production levels. They are not even graphically illustrated on the nebulous DEIR Conceptual Plan, notwithstanding that each level could apparently cover the entire Project Site. One paragraph in the DEIR’s 36-page project description does state, however, that both production levels “would provide space for basecamp, production staging, loading and emergency vehicle access throughout the Project Site.”¹⁷ (*Id.*, p. II-26) That brief discussion also seems to reflect that the two production levels would be at least partially enclosed, but the DEIR, as is so often the case regarding the DEIR Conceptual Plan, lacks clarity here.

If each production level covered even 50% of the Project Site¹⁸, that would mean the Specific Plan’s definition of “floor area” omits approximately **1,000,000** square feet of

commercial activity (25 acres x 43,560 square feet x 50% x 2). And, the long list of excluded areas in the Specific Plan's definition of "floor area" may well exempt other active areas within buildings that could be constructed on the Project Site.

It is apparent that there is something of a CEQA shell game going on here. The DEIR Conceptual Program in Table II-2 of the DEIR's project description provides the major clue. (DEIR, p. II-13) As shown thereon, the Project would increase the existing floor area on the Project Site by 1,626,180 square feet. This includes significant increases in floor areas for sound stages, production office and general office. Notably, however, the Project includes the demolition of almost all of the existing production support space. Specifically, 302,340 square feet of the existing 325,450 square feet of production support space would be demolished, with only 80,890 square feet of proposed new production support space, for a total of 104,000 square feet of production support space with the development of the Project.

The question, therefore, is how can Hackman hugely increase the overall square footage of the other production uses, while at the same time significantly reducing the existing production support space? The apparent answer is that Hackman plans to substitute and expand the existing production space with new production support space within the two planned production levels. The result is that, notwithstanding both the existing production space and the new production levels would be located in "buildings," somewhere in the range of 1,000,000 square feet of new production support space on those two production levels has been arbitrarily exempted from the definition of "floor area" in the Specific Plan, which artificially and significantly reduces the Project's true floor area.¹⁹

As discussed in following sections of this letter, many of the environmental analyses in the DEIR are based on the floor area of the Project. This includes multiple air quality impact analyses (DEIR, pp. IV.A-59-77), the energy impact analyses (*id.*, pp. IV.C-22-41), noise impact analyses (*id.*, pp. IV.I-48-55, Appendix M.1), the fire protection services impact analysis (*id.*, p. IV.J.1-24), the police protection services impact analysis (*id.*, p. IV.J.2-26), transportation impact analyses (*id.*, p. IV.K-74, Appendix M, pp. 122-123), and almost all of the utilities and service systems impact analyses (water supply and infrastructure, wastewater, electric power and natural gas) (*id.*, pp. IV.M.1-35-36 [Table IV.M.1-5], IV.M.1-37-38 [Table IV.M.1-6], IV.M.2-14-17 [Tables IV.M.2-2 and IV.M.2-3], IV.M.3-12-13).

¹⁷ Similarly, only one page in the 787-page Transportation Assessment for the Project mentions the two enormous production levels and the Conceptual Site Plan in the Transportation Assessment also omits them. (DEIR, Appendix M.1, pp. 4, 11 [Figure 1])

¹⁸ While the DEIR and Transportation Assessment scrupulously avoid providing graphic details regarding the two production levels (even conceptually), the Application Plans reflect that the preparers of those documents once again omitted known details regarding those two levels. In particular, the "Floor Plan-Level BI" sheet reflects that one of those two levels, more likely the below-grade production operations level, would conceptually cover approximately 50% of the Project Site.

- ¹⁹ The DEIR Conceptual Program takes this even further. Notes c and d in Table II-2 state that 44,676 square feet of existing production office and general office space would not be demolished but may be converted to basecamp use. (DEIR, p. II-13) Given that the Specific Plan excludes basecamp areas from its definition of floor area, even substantial square footage in existing buildings may therefore be excluded from the development cap of 1,874,000 square feet.

Response to Comment No. 35-41

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 for details of how the Project's definition of floor area does not understate the environmental impacts of the Project and how all areas, uses, and activities have been accounted for, including in the impact areas referenced in this comment. Note that no active production areas would be located in the parking or basecamp areas below Project Grade as discussed in Response to Comment No. 26-121. Also note that the Conceptual Site Plan depicts the Project Site from a "bird's eye" or plan view above the Project Site and is not intended to depict the subterranean levels. CEQA does not require the EIR to include a graphic depicting exact details of parking, interior circulation, and basecamp areas. Nonetheless, the below-Project Grade level is depicted in Figure II-6(a) in Section III, Revisions, Clarifications and Corrections to the Draft EIR, which is consistent with the architectural plans on file with the City. Also note that the conversion of office floor area to basecamp uses would reduce floor area and also reduce impacts as office uses generally generate more impacts than basecamp uses.

Refer to Response to Comment No. 26-16 regarding the ratio of studio land uses.

Comment No. 35-42

Moreover, the DEIR's impact analyses reflect that production support space does generate environmental impacts. As one of many examples, the VMT traffic analysis demonstrates that production support use generates traffic trips and that using the land use exchange program to decrease sound stage floor area and increase production support floor area substantially increases the Project's work VMT per employee. (DEIR, pp. IV.K-73–77)

Response to Comment No. 35-42

The comment correctly notes that increasing production support space while decreasing sound stage space increases the Project's work VMT per employee. However, it incorrectly claims this results in environmental impacts. With regard to the VMT analysis, the Draft EIR analyzed the proposed development program and two other scenarios that account for the limited Land Use Exchange Program, including "maximum transportation impact scenario 2" on page IV.K-77, which assumes eliminating sound stages and allocating all of that space to production support. While work VMT per employee would increase to 7.6 under that scenario, it would not exceed the significant impact threshold (also 7.6) and, thus, would not result in a significant impact. Moreover, as stated on page

IV.K-77 of the Draft EIR, this does not represent a likely development scenario, as a balance of sound stages and production support uses are necessary for a functioning studio campus and in order to meet the objectives set forth in Section II, Project Description, of the Draft EIR. Refer to Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 35-38 regarding the Land Use Exchange Program and the Draft EIR's comprehensive transportation analysis.

Comment No. 35-43

As a result, the omission of these production levels necessarily results in a substantial understatement of the Project's actual environmental impacts. As one prominent example, the CalEEMod inputs for DEIR's operational air quality analyses entirely omit the production levels and their floor area. This omission is unstated in the DEIR text, which forces the reader to delve into the underlying air quality modeling in Appendix B (Air Quality and Greenhouse Gas Emissions) to the DEIR, which discloses that, while the model accounts for operational pollutant emissions associated with enclosed and unenclosed parking areas (which fall outside both the Specific Plan and LAMC definitions of floor area), the model ignores the Mobility Hub, basecamp areas and other production-related activities contemplated within the two production levels. (DEIR, Appendix B, pp. 98 and 102–105 of PDF)

Response to Comment No. 35-43

Please see Response to Comment Nos. 26-E.1-27, 26-E.1-28, and 35-53 for a discussion on the conservative nature of the CalEEMod land use modeling and how the Draft EIR analyzed the potential physical environmental impacts of all proposed uses, areas, and activities, regardless of whether they are considered to be within the definition of floor area.

Comment No. 35-44

In contrast, in two other impact analyses, the preparers of the DEIR acknowledge that at least some of the floor area in the two production levels must be considered. Specifically, in estimating the Project's water demand, the DEIR factors in 194,600 square feet of basecamp area and 36,000 square feet for the Mobility Hub, a total of 230,600 square feet. (DEIR, pp. IV.M.1-35-38 [Tables IV.M.1-5 and IV.M.1-6]) The same is true with respect to the DEIR's estimate of the Project's wastewater demand. (*Id.*, pp. IV.M.2-14-17 [Tables IV.M.2-2 and IV.M.2-3]) These sizable uses should have been taken into account in all of the other relevant impact analyses, but were not.

Having said this, how was the basecamp floor area calculated? To our knowledge, there is nothing in the DEIR to substantiate this number. We surmise that the basecamp area comes from plans that have not been disclosed to the public, or perhaps from the "Floor

Plan—Level B1” sheet in the Application Plans, which shows the general locations of multiple basecamp areas. But the public really has no idea. Moreover, why do these water and wastewater demand calculations omit the floor area of the rest of the two production levels, which are apparently intended to collectively include far more than 230,600 square feet of space?

Response to Comment No. 35-44

Refer to Response to Comment No. 26-140 regarding the inclusion of basecamp uses throughout the impact analyses in the EIR. As discussed in Topical Response No. 2, Definition of Floor Area is Appropriate, the impacts associated with the Mobility Hub were fully analyzed in the EIR.

In addition, as set forth on pages II-25 to II-26 of Section II, Project Description, of the Draft EIR, the below grade levels referred to by the comment would be part of an integrated circulation and access plan with ancillary functions as follows.

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

As discussed in Response to Comment No. 26-121, the circulation, parking and basecamp areas below Project Grade would not include active production activities. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR, which shows the existing and proposed basecamp areas. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, regarding the proposed Specific Plan’s definition of floor area. Refer to Table II-2 on page II-13 in Section II, Project Description, of the Draft EIR for the land use and floor area breakdown of the proposed

development program (i.e., Conceptual Site Plan [Figure II-4 on page II-14 of the Draft EIR]) that was analyzed in the Draft EIR.

Comment No. 35-45

E. The DEIR's Analysis of the Project's Air Quality Impacts Is Inadequate.

For the numerous reasons discussed below, the DEIR's analysis of the Project's air quality impacts is inadequate and distorts and/or understates the Project's true air quality impacts. The comments below are supported in part by the Ramboll Letter, and the Ramboll Letter includes comments that are not summarized or referenced here.

1. The DEIR Unlawfully Failed To Include and Summarize a Health Risk Assessment.

The construction and operation of the Project is anticipated to include high levels of diesel particulate matter ("DPM") and other toxic air contaminants ("TAC"). Despite these substantial TAC emissions, the DEIR does not include a health risk assessment ("HRA") to evaluate the potential health impacts (e.g., acute, chronic and cancer risk) from construction and operation of the Project on adjacent sensitive land uses, including the BC Site. Instead, the DEIR summarily dismisses the need for an HRA by claiming that (1) the Project only has short-term construction impacts based on a 32-month construction schedule, (2) the Project includes less than 100 diesel-fueled trucks per day during operations and (3) the land uses associated with operation of the Project "are not considered land uses that generate substantial TAC emissions." (DEIR, pp. IV.A-68, IV.A-72) As discussed in more detail below, these statements are all inaccurate and unsupported by the DEIR.

Broadcast Center requests the City to update the DEIR to include an HRA that addresses the Project's short- and long-term construction impacts and operational impacts of the Project. As written, the DEIR provides limited information to the residents at Broadcast Center and other sensitive receptors in the surrounding area about how the Project could impact their health.

Response to Comment No. 35-45

Contrary to the commenter's assertion, the Draft EIR was not required to include a quantitative HRA. CEQA does not specifically require the completion of a quantitative HRA but, instead, requires that a project correctly identify and disclose the effects of pollutants, such as TACs, from project activities. Such identification and disclosure of impacts for the Project is performed qualitatively in the Draft EIR. Please see Response to Comment Nos. 1-3 and 1-4 for an explanation of why the qualitative health impact assessment included in the Draft EIR was indeed appropriate for this Project. Nonetheless, in response

to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. Refer to Response to Comment No. 26-E.1-2 regarding the HRA. As shown therein, the quantitative HRA demonstrates the Project would not result in significant health risks and confirms the findings of the Draft EIR.

See Response to Comment No. 26-E.1-21 for a discussion of sensitive receptors in proximity to the Project Site.

See Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline and the long-term buildout impact assessment.

See Section E, Truck Trips, of Topical Response No. 10, Trip Generation, and Response to Comment No. 26-E.1-16 for a discussion of Project truck trip generation during operation.

Comment No. 35-46

a. Construction Impacts.

The construction of the Project will require use of heavy-duty trucks and heavy-duty off-road equipment during the entire construction period. (*Id.*, Appendix B, [Air Quality and GHG Technical Appendix], the “Air Quality Report”) Section IV.A (Air Quality) of the DEIR assumes two very different construction scenarios: (1) a 32-month construction period with a buildout year of 2026 (“2026 Buildout”); and (2) a 20-year construction timeline with concurrent operations with a final buildout year of 2043 (“Long-Term Buildout”). (DEIR, p. II-12; *see also* p. II-33) Therefore, the construction period could be anywhere between approximately three years and 20 years, an enormous range of time. The DEIR provides limited justification to support why it did not consider any construction period longer than three years and less than 20 years.

Under both of these assumed scenarios, construction would occur adjacent to, or in very close proximity to, numerous sensitive receptors, including Broadcast Center, which includes numerous dwelling units that have windows and balconies facing the Project Site, only seven feet from the Project Site. In fact, sensitive receptors (*e.g.*, residences, parks, hotels, etc.) surround the Project Site on all four sides, despite the misleading figure created for the DEIR.²⁰ (DEIR, p. IV.A-30 [Figure IV.A-4, Air Quality Sensitive Receptors Locations]) See Figure 1, Haul Truck Routes from the Ramboll Letter, which more accurately illustrates the expansive number of sensitive receptors surrounding the Project Site.

Notwithstanding the proximity and number of sensitive receptors near the Project Site, the DEIR summarily dismisses the need to prepare an HRA, based on an unrealistic and

unsupported assumption that the construction schedule would only be “short-term” in nature. The DEIR claims: “[g]iven the short-term construction schedule of approximately 32 months (2.5 years), the Project would not result in a long-term (*i.e.*, 70-year) source of TAC emissions.” (*Id.*, p. IV.A-68) However, as stated previously, the DEIR includes both a 2026 Buildout and a Long-Term Buildout. But, the Long-Term Buildout is ignored in DEIR’s analysis of TAC emissions. (*Id.*, pp. IV.A-74-77) As an attempt at justification, the DEIR claims that construction air quality impacts are evaluated based on a worst-case scenario using the “worst-case day.” However, this is only true and conservative for some air quality analyses, but not for the analysis used for an HRA. The methodology for a health risk analysis consists of four main steps: (1) hazard identification; (2) exposure assessment; (3) dose-response assessment; and (4) risk characterization.²¹ As recognized in other HRAs prepared for the City, long-term exposure to low concentrations of chemicals may eventually cause harm, meaning that a worst-case day analysis may not actually result in a worst-case analysis for purposes of health risk analyses. Therefore, a worst-case day analysis is misleading in that it sounds conservative and the “worst-case,” but in actuality it does not account for health impacts related to long-term exposure to chemicals at lower doses. So, the long-term exposure and potential health impacts to sensitive receptors from a Long-Term Buildout was not analyzed in the DEIR. As such, the DEIR fails to inform the public, especially the thousands of residents living in nearby sensitive receptors, of the true scope of health impacts caused by the Project.

²⁰ The DEIR also excludes several sensitive receptors from Figure IV.A-4 that are located closer to the Project Site than those identified in that Figure, including (1) future residential uses and sensitive receptors at 3rd & Fairfax Project, (2) residential uses at the Gilmore Adobe, 6333 W. Third Street, (3) The Fairfax Apartments, W. 1st Street and I 05 S. Fairfax Avenue, (4) SureStay Hotel by Best Western on Beverly and Genesee Avenue, 7721 Beverly Boulevard, (5) Beverly Inn, 7701 Beverly Boulevard, (6) School of Rock, 7801 Beverly Boulevard, and (7) Short Stories Hotel, 115 S. Fairfax Avenue.

²¹ “The first step, hazard identification involves determining the potential health effect which may be associated with emitted pollutants. The purpose is to identify qualitatively whether a pollutant is a potential human carcinogen or is associated with other types of adverse health effects. Depending on the chemical, these health effects may include short-term ailments or chronic diseases. The dose-response assessment is designed to characterize the relationship between the amount or dose of a chemical and its toxicological effect on the human body. Responses to toxic chemicals will vary depending on the amount and length of exposure. For example, short-term exposure to low concentrations of chemicals may produce no noticeable effect, but **continued exposure to the same levels of chemicals over a long period of time may eventually cause harm.** The purpose of the exposure assessment is to estimate the extent of exposure to each substance for which risk will be evaluated. This involves emission quantification, modeling of environmental transport, identification of chemicals of concern, identification of exposure routes, identification of exposed populations, and estimation of long-term exposure levels. Risk characterization is an integration of the health effects and public exposure information developed for emitted pollutants to provide a quantitative probability of adverse health effects.” (Final EIR, Appendix FEIR-7, Health Risk Assessment for 3rd & Fairfax Project, pp. 6–7, emphasis added)

Response to Comment No. 35-46

The commenter incorrectly states that no interim years other than 2026 (32-month buildout) and 2040 (long-term buildout) were analyzed in the Draft EIR. As clearly presented in Table IV.A-12 of the Draft EIR, interim years with overlapping construction and operation were analyzed, including 2026, 2030, 2035, 2040, and 2043. Refer to Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline and the long-term buildout impact assessment.

The commenter also incorrectly asserts that Figure IV.A-4 of the Draft EIR excludes several sensitive receptors that are located closer to the Project Site than those identified in that figure. As stated on page IV.A-31 in Section IV.A, Air Quality, of the Draft EIR, only those sensitive receptors nearest to the Project Site are displayed in Figure IV.A-4. In review of the additional receptors identified in this comment, hotels would not be considered sensitive receptors based on the definition included in the SCAQMD's LST methodology. While the School of Rock does include camps and lessons, it would not be considered a school where children would spend substantial amount of time on an ongoing basis and is not considered a sensitive receptor. Figure IV.A-4 has been updated to include the 3rd and Fairfax Project and the Fairfax Apartments; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. While these additional sensitive receptors were not specifically identified in Figure IV.A-4, the closest sensitive receptor land use to the Project Site would remain to be the residential use located immediately east of the Project Site (Broadcast Center Apartments). As shown in Table IV.A-10 and Table IV.A-11 of the Draft EIR, Project localized construction and operational emissions would remain below the significance thresholds for all identified receptors. Based on the SCAQMD LST methodology properly employed in the Draft EIR, impact estimates would be greatest at those receptors closest to the Project Site and would be lower at all other receptors. Please see Response to Comment No. 26-26 for a discussion of analyzed sensitive receptors and the conservative nature of the LST methodology. This response to comment also discusses the types of land uses considered to be sensitive receptors under the applicable methodology.

Please see Response to Comment Nos. 26-E.1-2 and 26-E.1-14 for a discussion of human health risk impacts and the Draft EIR's conservative use of the 32-month buildout scenario for the analysis of Project health risk. Moreover, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the conclusions of the Draft EIR.

Comment No. 35-47

In addition, the DEIR should have included an analysis of health impacts related to a 2026 Buildout, given the proximity of numerous residential uses near the Project Site, which includes dozens of apartments with windows and balconies facing the Project Site. These residents would have direct exposure to DPM and other TAC emissions during the entire duration of construction over a large construction area of approximately 25 acres. Moreover, the Office of Environmental Health Hazards Assessment's ("OEHHA") Air Toxics Hot Spots Program Guidance Manual for Preparation of Risk Assessments ("2015 OEHHA Guidance Manual"), provides recommendations related to cancer risk evaluation of short-term projects, which further demonstrates that the DEIR should have addressed short-term construction impacts.²² In the recent past, the City has required the preparation of HRAs in connection with EIRs for residential projects that examine health impacts related to short-term construction consistent with these recommendations.

Therefore, either a 2026 Buildout or a Long-Term Buildout necessitates the preparation of an HRA. As such, the analysis in the DEIR should be updated to include an HRA that examines the Project's health impacts related to both a 2026 Buildout and a Long-Term Buildout.

²² "The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation." See Section 8.2.10 of the 2015 OEHHA Guidance Manual.

Response to Comment No. 35-47

Please see Response to Comment No. 26-E.1-14 for a discussion of human health risk impacts. Moreover, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the conclusions of the Draft EIR.

This comment misconstrues information in the 2015 OEHHA Guidance regarding applicability of preparing an HRA of short-term projects. In addition, this comment incorrectly claims that the Draft EIR was required to conduct a quantitative HRA based on this guidance. OEHHA adopted the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (2003 Guidance Manual) in October of 2003. The Guidance Manual was developed by OEHHA, in conjunction with CARB, for use in implementing the Air Toxics "Hot Spots" Program (Health and Safety Code Section 44360 et. seq.). The Air Toxics "Hot Spots" Program requires certain stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Program are to collect emission data, identify facilities having

localized impacts, ascertain health risks, to notify nearby residents of significant risks, and reduce those significant risks to acceptable levels.

OEHHA adopted a new version of the *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments* (2015 Guidance Manual) in March of 2015.¹³² CARB acknowledges that the Guidance Manual does not include guidance for projects prepared under the auspices of CEQA and that it would be “handled by individual [Air Pollution Control] Districts.”¹³³ The intent in developing the 2015 Guidance Manual was to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of new or modified stationary sources.¹³⁴ The 2015 Guidance Manual provides recommendations related to cancer risk evaluation of short-term projects. As discussed in Section 8.2.10 of the 2015 Guidance Manual, “[t]he local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.” Short-term projects that would require a permitting decision by SCAQMD typically would be limited to site remediation (e.g., stationary soil vapor extractors). The extent of potentially contaminated soils and groundwater are not anticipated to require a permitting decision by SCAQMD. The 2015 Guidance Manual does not provide specific recommendations for evaluation of short-term use of mobile sources (e.g., heavy-duty diesel construction equipment). OEHHA’s recommendation to prepare a quantitative HRA for a short-term project does not apply to this Project. Please note that construction activities associated with potentially contaminated soils and groundwater were included in the above-referenced HRA (see Appendix FEIR-10 of this Final EIR).

Comment No. 35-48

To fill in these informational gaps, Ramboll performed a screening-level analysis for construction impacts for the 2026 Buildout. Using the CalEEMod-generated unmitigated emissions reported in DEIR for the 2016 Buildout, Ramboll completed a Tier 3 HRA for on-site construction equipment using the United States Environment Protection Agency (“USEPA”) AERSCREEN tool. The screening-level analysis determined that DPM from on-site construction equipment would generate a maximum incremental cancer risk of **52.9 in a million** at the property line and **65.2 in a million** at a distance of 175 meters from

¹³² Office of Environmental Health Hazard Assessment, Air Toxicology and Epidemiology, Adoption of Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, March 6, 2015, <https://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

¹³³ CARB, Risk Management Guidance for Stationary Sources of Air Toxics, July 23, 2015, www.arb.ca.gov/toxics/rma/rmgssat.pdf, p. 19.

¹³⁴ CARB, Overview of the Air Toxics “Hot Spots” Information and Assessment Act, ww2.arb.ca.gov/overview-air-toxics-hot-spots-information-and-assessment-act.

the Project Site. (Ramboll Letter, Attachment A). This is well over the **10 in a million significance threshold** for a significant health risk impact. While the use of Tier 4 construction equipment, as required by Mitigation Measure AIR-MM-1, could reduce the health risk impacts below this threshold, the DEIR did not evaluate and disclose the unmitigated impact, nor demonstrate how AIR-MM-1 would mitigate that significant impact to less than significant. In addition, if corrected CalEEMod assumptions were used (see discussion below), the construction health impacts would be even greater and may not be mitigable.

Response to Comment No. 35-48

This comment is similar to Comment No. 26-E.1-14. Please see Response to Comment No. 26-E.1-14.

Comment No. 35-49

As a final point, the health risk impacts of the truck activity at the two “potential” offsite truck staging areas (shown on Figures IV.I-4 and IV.I-5 in the DEIR) that will be used during project construction are not evaluated in the DEIR. The Project is expected to generate over 102,000 hauling truck trips during construction. Many of those trucks would use these staging areas. There are numerous sensitive receptors, including residences, schools and a hospital, that are located in the vicinity of these staging areas and would be exposed to DPM and other TAC emissions from trucks. (Ramboll Letter, Figures 2 and 3) Therefore, the required HRA should assess and disclose the health impacts on sensitive receptors near the potential staging areas.

Furthermore, these trucks would enter the Project Site during construction. DPM emissions from the onsite activity of these trucks (driving and idling) should be evaluated as part of the HRA construction analysis.

b. Operational Impacts.

The Project contemplates several new mobile and stationary sources of DPM and other TAC emissions during operation that further necessitate the preparation of an HRA. Specifically, the Project apparently includes new mobile sources such as diesel-fueled delivery and production trucks, the addition of a private roads [sic] adjacent to the BC Site, and the construction of a Mobility Hub. The Project also apparently includes new stationary sources such as diesel-fueled generators for emergency power and for basecamps, spray-paint booths, and the storage and use of hazardous materials like diesel-fuel filled belly tanks and above-ground storage.²³ These sources of DPM and other TAC emissions would be located adjacent to sensitive receptors, including the many windows and balconies in Broadcast Center that abut the Project Site.

Despite the proposed uses and proximity to sensitive receptors, the DEIR dismisses the need to prepare an HRA to assess operational health impacts with incomplete, unsupported and sometimes misleading claims about the Project. (DEIR, p. IV.A-72) To start with, the DEIR recognizes that, for mobile sources, the South Coast Air Quality Management District (“SCAQMD”) recommends preparation of an HRA when a project includes “substantial individual sources” of DPM such as truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units.²⁴ (*Id.*, p. IV.A-72)

²³ The Existing Television Studio is currently designated as a small quantity generator under the Resource Conservation and Recovery Act (“RCRA”). (DEIR, p. IV.F-48) The DEIR recognizes that the Project could increase the hazardous-waste generating activities, but does not state whether Hackman’s designation would change or require reassignment. The DEIR also does not address how or whether this designation undercuts statements regarding the types of TACs anticipated on the Project Site. According to the DEIR, the only TACs anticipated as part of operations (except mobile sources) include cleaning solvents, paints, landscape pesticides, etc. (*Id.*, p. IV.A-72) The DEIR, however, does not discuss the other potential sources of TACs identified in Section IV.F (Hazards and Hazardous Materials), such as diesel storage tanks, diesel-fuel generators, spray paint booths, etc.

²⁴ See also California Air Resources Board (“CARB”), Air Quality and Land Use Handbook: A Community Health Perspective.” April 2005, Table 1-1 on p. 4.

Response to Comment No. 35-49

The first paragraph of this comment is similar to Comment No. 26-E.1-20. Please see Response to Comment No. 26-E.1-20. Please see Response to Comment No. 26-E.1-18 for a discussion of operational TAC sources, including emergency generators, portable generators, and spray paint booths. Additionally, as discussed in Response to Comment No. 26-34, the Project does not propose a fueling station, and a fueling station is not permitted under the proposed Specific Plan. As such, there would be no fueling belly-tanks on-site. Furthermore, VOC emissions and related TACs from diesel storage tanks associated with emergency generators would not represent a substantial TAC source. The combustion of diesel and not the storage of diesel contributes to cancer risk. SCAQMD provides guidance regarding the calculation of VOC emissions from storage tanks, which provides 0.0028 pound of VOC per 1,000 gallons of diesel throughput.¹³⁵ In 2019, Television City used approximately 3,464 gallons of diesel for all of the emergency generators, which would equate to less than 10 pounds per year (0.03 pound per day) of VOC emissions across the Project Site. These emissions were not required to be reported in Television City’s Annual Emission Reports. Please refer to Response to Comment No. 1-4 for a discussion of the 100 trucks per day siting criteria. Please refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, for a detailed explanation of the

¹³⁵ SCAQMD, Supplemental Instructions for Liquid Organic Storage Tanks Annual Emissions Reporting Program, revised December 2020.

trip generation assumptions, which went into the Draft EIR's daily truck estimates. Please refer to Response to Comment No. 26-E.1-21 regarding impacts to Broadcast Center Apartments.

Additionally, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. The HRA includes all anticipated sources of DPM (e.g., emergency generators and spray paint booths) and other TAC which would occur on the Project Site during construction and operations. As shown therein, health risk impacts would be less than significant, confirming the conclusions of the Draft EIR.

Refer to Response to Comment No. 26-78 regarding the hazardous waste categorization for the Project Site and how the routine use of small quantities of potentially hazardous materials will continue to be managed in similar quantities in accordance with applicable permits and regulations, such as LAFD CERS/CUPA permitting requirements, under which the Project Site currently operates.

Comment No. 35-50

The DEIR claims that daily truck trips for the Project would not exceed 100 trucks per day or more than 40 with operating transport refrigeration units. (*Id.*, p. IV.A-72) However, these claims are not supported by evidence elsewhere in the DEIR and Appendices. The CalEEMod assumptions in the Air Quality Report reflect that the Project would generate approximately 559 one-way trips or 279 round trips per day during operations, far greater than 100 trucks per day. (Air Quality Report, pp. 102 and 103; Ramboll Letter, Comment 4c). This is almost three times more than the 100 truck trips/day threshold that triggers the need for a mobile air toxics HRA.

Figures in the transportation analysis also indicate that more than 100 trucks per day is likely. We count approximately 54 large, 18-wheeler trucks shown in these figures, which only includes at-grade activity and omits, at a minimum, the below-grade production level. This further indicates that considerably more than 100 trucks would visit the Project Site each day. (DEIR, Appendix M.1 [Transportation Assessment, Figures 1, 2B, 3,]; [sic] *Id.*, p. IV.K-43 [Figure IV.K-3]) Setting aside the lack of transparency, the number of anticipated diesel-fueled trucks alone should have triggered preparation of an HRA to assess health impacts from DPM and other TAC emissions from operational mobile sources.

Response to Comment No. 35-50

This comment is similar to Comment No. 26-29. Refer to Response to Comment Nos. 26-29.

This comment misrepresents information included in the figures in the transportation analysis. Figure 2B (Project Site Vehicular Access Proposed) on page 13 of Appendix M.1, Transportation Assessment, of the Draft EIR shows truck access and routing throughout the Project Site by depicting truck movements regardless of at-grade or below-grade and not the proposed number of trucks per day.

Additionally, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the conclusions of the Draft EIR.

Comment No. 35-51

In addition, the Project includes two new “conceptual” private streets adjacent to Broadcast Center, but fails to address their potential health impacts on Broadcast Center residents. Specifically, the DEIR Conceptual Plan includes two new private streets, one of which would be adjacent to the southerly boundary of the BC Site and the second of which would be adjacent to the western boundary of the BC Site. (DEIR, p. II-14 [Figure II-4]) The western private street would include four lanes and have a width of 30 feet (*id.*, p. IV.K-43 [Figure IV.K-3]), and Hackman has indicated that this private street would be used for truck traffic. In addition, based on the Height Zone Map in Figure II-5, Hackman could construct one or more 160-foot-tall buildings immediately adjacent to the western private street and 37 feet from the Broadcast Center building, approximately seven feet from the western boundary of the BC Site. (*Id.*, p. II-20)

Similarly, the southern private street would include six lanes and have a width of 60 feet. (*Id.*, p. IV.K-43 [Figure IV.K-3]). Hackman has indicated that the street would also support truck traffic. Based on the Height Zone Map, Hackman could construct one or more 130-foot-tall buildings immediately adjacent to the southern private street.

What this means is that the new streets would support traffic from diesel-fueled trucks adjacent to sensitive receptors and the windows and balconies of Broadcast Center residents. Despite this obviously problematic project feature, the DEIR does not address potential health impacts from siting these new private streets immediately adjacent to Broadcast Center.

Moreover, the new private streets would essentially create “canyons” between the Broadcast Center building and the new buildings at the edges of the Project Site. The TAC emissions from diesel-fueled trucks would linger in the “canyons” for longer periods, rather than more quickly dispersing. The DEIR does not address this unique and potentially harmful condition created by the Project, or the potential health impacts on nearby sensitive receptors.

As previously discussed, the Project also includes an onsite Mobility Hub (depicted in Figure II-9 of the DEIR) that would support first/last mile connections, encourage employee and visitor use of public transit through the provision of a shuttle bus service,²⁵ carpooling, vanpooling, and biking/scooter to work, and support transportation demand management strategies. (DEIR, p. II-26) However, the scope and location of the Mobility Hub is conceptual and it could be located anywhere on the Project Site since the DEIR Conceptual Plan only illustrates one potential development scenario. Broadcast Center believes that it would be highly inappropriate to place the Mobility Hub in proximity to its building. That said, if the air quality analysis in the DEIR truly reflected a worst-case scenario, as stated in the project description (*id.*, pp. II-16–17), the analysis should have assumed that the Mobility Hub would be located adjacent to the BC Site. To the contrary, however, the analysis does not address potential health impacts of siting the Mobility Hub near any sensitive land use, notwithstanding that Hackman would have full discretion to do precisely that.

²⁵ It is important to note that the project description also states that shuttle buses would use the Mobility Hub. (DEIR, pp. II-26, 30 [Figure II-9]) However, the DEIR provides almost no information about the shuttle buses. For example, it is not clear whether the shuttle buses would use diesel or gasoline, how many buses are anticipated per day, or whether the shuttle buses would enter the Project Site on either of the new private streets adjacent to Broadcast Center. How would diesel-fueled shuttle buses impact the health of adjacent residents? Were the shuttle buses factored into the DEIR's determination that an HRA is not required for the Project? Would the number of shuttle buses increase over time? Would there be any cap on the maximum number of shuttle buses per day? The DEIR should provide information to address these basic questions. The DEIR should be updated to fill in these informational gaps and address the potential health impact from diesel-fueled shuttle buses.

Response to Comment No. 35-51

See Response to Comment No. 26-E.1-21 for a discussion of why further investigation into speculative and unsubstantiated alleged “air canyon” effects is not warranted. As discussed in the response, the findings of the Draft EIR would not be meaningfully changed by the consideration of additional downwash effects, and the results of the Draft EIR and HRA, included as Appendix FEIR-10 of this Final EIR, are conservative in their assessment of potential health risks. Please see Response to Comment No. 26-E.1-23 and Topical Response No. 7, Mobility Hub, for a discussion of the vehicle trip effects of the Mobility Hub, which would be expected to reduce vehicle trips and VMT associated with Project operations.

Refer to Topical Response No. 7, Mobility Hub, for a more detailed discussion of the function and location of the Mobility Hub. Contrary to what is stated in this comment, Figure 4 (Mobility Hub Conceptual Plan) on page 15 of Appendix M.1, Transportation Assessment, of the Draft EIR provides additional details regarding the Mobility Hub. The primary Mobility Hub functions and location are proposed in the southwest corner of the Project Site, near the intersection of Fairfax Avenue and 1st Street, as shown in the Conceptual Site Plan in the Draft EIR and Transportation Assessment. Also refer to

Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan that requires, among other things, a discretionary approval and CEQA compliance review for substantial changes to the Project. While not specifically identified in the Draft EIR, the Mobility Hub would not include any diesel fueled shuttles (thereby reducing DPM and health risk impacts), and the shuttles were instead conservatively assumed to be gasoline-fueled, although four EV chargers would be provided for future electrical shuttles. Additional details regarding the number and type of shuttles and Mobility Hub are included in the quantitative HRA, included as Appendix FEIR-10 of this Final EIR and the Mobility Hub Memo included as Appendix FEIR-20 of this Final EIR. As discussed therein, the Mobility Hub would result in approximately 52 shuttle round trips (approximately 90 VMT per day based on an approximately 1.7-mile round trip) to the Metro D (Purple) Line Wilshire/Fairfax Station and would displace approximately 1,346 auto trips (over 9,000 VMT per day based on 6.7 VMT per capita as shown in Table IV.K-5 of the Draft EIR). The Draft EIR conservatively did not account for the reduction in emissions associated with the reduction in trips and VMT associated with the use of the Mobility Hub. These shuttle bus trip totals would accommodate the anticipated demand from the full buildout of the Project and, thus, are not expected to increase beyond these levels. Clarification regarding the additional EV chargers is provided in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Thus, the Draft EIR's analysis of health impacts and the HRA present conservative assessments of Project health impacts.

The comments expressing the commenter's opinions are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 35-52

With respect to stationary sources, the DEIR makes the blanket claim that the land uses associated with operation of the Project "are not considered land uses that generate substantial TAC emissions." (*Id.*, p. IV.A-72) However, the DEIR glosses over the fact that the Project, like the Existing Television Studio, actually does include sources of TACs, including spray-paint booths, diesel-powered generators for emergency power and for basecamps, and broilers. Starting with the Existing Television Studio, based on publicly available data that Ramboll reviewed from SCAQMD's Facility Information Detail ("FIND") database, the Existing Television Studio currently uses numerous sources of TAC emissions, including six diesel emergency generators, four spray booths, and six boilers.²⁶ (Ramboll Letter, Comment 4e) Annual TAC emissions from these existing sources, as reported to SCAQMD in calendar year 2021, are shown in Table 1 in the Ramboll Letter. Table 1 shows that DPM emissions from existing operations (*i.e.*, diesel generators) were greater than 39 pounds per year (lbs/yr) in 2021. SCAQMD's Risk Assessment Procedures (Permit Application Package "N") establish annual Tier 1 screening emission

levels for DPM, which range from 0.0483 lbs/yr for a 25-meter (m) receptor distance to 0.404 lbs/yr for a 100m receptor distance.²⁷ According to SCAQMD's Risk Assessment Procedures, these "six screening levels are pollutant emission thresholds, which are not expected to produce a maximum incremental cancer risk ["MICR"] greater than one in one million nor a hazard index greater than one."²⁸ The current operational DPM emissions are nearly 100 times greater than the DPM screening emission level at 100m and 800 times greater than the screening emission level at 25 meters, indicating that the MICR from DPM emission due to the operation of the existing diesel generators is likely far greater than 10 in a million. (*Id.*)

The DEIR does not discuss how the TAC emissions from the Existing Television Studio would change with the Project, despite the proposed intensification of the existing uses at the Project Site. (DEIR, pp. IV.A-71-72) As such, the reader has no idea whether the Project would worsen existing TAC emissions at the Existing Television Studio, keep emissions the same or similar, or reduce existing emissions. Without identifying the proposed stationary sources of TAC emissions, the public also has little understanding of the health impacts of the Project on sensitive receptors.

As such, in addition to an operational HRA, the DEIR should also be updated to include information regarding the scope, level of emissions, and health impacts of certain TAC-emitting uses proposed during operations of the Project, including the diesel-powered generators (emergency, basecamps, trailer-mounted), spray-paint booths, storage of waste paint and cleaning fluids (*i.e.*, hazardous wastes), clarifiers for the helipad and transformer substation, and the storage and use of hazardous materials like diesel-fuel belly tanks and above-ground storage. (*Id.*, pp. IV.F-29–30, 40, 41) These are all uses identified in Section IV.F (Hazards and Hazardous Materials) of the DEIR that would result in TAC emissions, yet the DEIR does not address whether these stationary sources of TAC would expand, stay the same, or be reduced, or if the TAC emissions would result in substantial health impacts to nearby sensitive receptors.

As an example, the DEIR states throughout that generators will be used for basecamp operations. (*Id.*, pp. 11-7; IV.A-10, 64 [Table IV.A-7], and 70 [Table IV.A-10]; IV.C-17 and 27 [Table IV.C-2]; and IV.F-32 and 41) However, the air quality analysis provides limited information related to the DPM emissions and health impacts from these generators. It is difficult to understand basic facts regarding the generators let alone their potential environmental impacts. Information regarding the number of proposed generators at the Project Site,²⁹ where the generators would be located, how many generators could be used at one time, how long generators would be running, or if the basecamp and trailer-mounted generators are included in the total estimate for "emergency" generators is completely missing from the DEIR. Without knowing this information, it is impossible for the public to understand the potential health impacts from the generators that very well could be placed adjacent to Broadcast Center, exposing dozens of residents to unhealthy levels of DPM.

- ²⁶ Data for Television City Productions, LLC, located at 7800 Beverly Blvd., Los Angeles, CA 90036, SCAQMD Facility ID 189282. Available at: <https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=189282>. Accessed: August 2022.
- ²⁷ SCAQMD Permit Application Package “N” For Use in Conjunction with the Risk Assessment Procedures for Rules 1401, 1401.1, and 212. Version 8.1. Available at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/attachmentn-v8-1.pdf?sfvrsn=4>. Accessed: August 2022.
- ²⁸ SCAQMD Risk Assessment Procedures for Rules 140 I, 1401.1 and 212. Version 8.1. Available at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=l2>. Accessed: August 2022.
- ²⁹ The only information contained in the DEIR regarding the number of existing and proposed diesel-powered generators is in Section IV.C (Energy), which states that six emergency generators are currently used on the Project Site, and that the Project would increase the amount of diesel fuel used by generators by an additional 4,594 gallons per year (which, if you do the math, would increase the total to approximately nine generators). However, as a separate issue, this assumption raises the obvious question of whether it is reasonable to assume that the proposed intensification of uses and increase in square footage at the Project Site would only require three additional generators. The DEIR provides no justification for this assumption. And, the facts suggest otherwise. The project description reflects the continued use of belly tanks and aboveground storage tanks (“AST”) for diesel fuel storage at the Project Site, which implies that the generators could be used frequently, likely beyond any “emergency” use.

Response to Comment No. 35-52

The first portion of this comment is similar to Comment No. 26-E.1-18. Please see Response to Comment Nos. 1-3 and 26-E.1-18 for a discussion of existing and future Project permitted source TAC emissions, including emergency generation units, boilers, portable generators, and paint booths. In the comment footnote, the commenter suggests that the number of emergency generators proposed in the Project is speculative, which is incorrect. The generators included in the Project assessment represent the number of emergency generation units necessary to meet reasonably foreseeable needs of the facility based on the designs and operational uses specified for the Project. However, the emergency generator calculation sheet was inadvertently not provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. This worksheet is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As shown therein, the Project would include 7 new emergency generators. Please refer to Response to Comment No. 1-4 for a detailed discussion of emissions associated with the existing and proposed emergency generators.

This comment incorrectly states that the Draft EIR includes multiple references to generators being used for basecamp operations; refer to Response to Comment No. 26-36.

Additionally, as discussed in Response to Comment No. 35-49, the Project does not propose a fueling station, and a fueling station is not permitted under the proposed Specific Plan. As such, there would be no fueling belly-tanks on-site.

As discussed in Response to Comment Nos. 26-15 and 16-87, while both the existing conditions and future Project would include a helipad, the operational usage of the helipad would not be expected to change as a result of the Project and its location would be expected to be located higher (i.e., further from receptors) than under existing conditions. Storage of operational wastes, such as paint and cleaning fluids, would be consistent with regulatory requirements for hazardous waste products and would not be expected to result in an airborne source of TAC beyond the architectural coating and consumer product emissions estimated in the Draft EIR modeling. Please refer to pdf page 106 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR for the calculation of architectural coating and consumer product emissions.

As discussed above in Response to Comment No. 26-E.1-18, the Project would not create new substantial sources of TACs and would result in overall reductions to existing TAC emissions at the Project Site, and the Draft EIR correctly concluded that impacts would be less than significant based on the qualitative health risk analysis. However, in response to comments on the Draft EIR, further evaluation of TAC emissions is included in a quantitative HRA, provided as Appendix FEIR-10 of this Final EIR, which confirms the conclusion in the Draft EIR. Please note that the seven new emergency generators were located for analysis purposes in close proximity to the Broadcast Center Apartments for purposes of the HRA to conservatively evaluate potential health risk impacts at this sensitive receptor.

Comment No. 35-53

2. The Nebulous Project Description Invalidates the Entire Air Quality Analysis.

Broadcast Center has significant concerns regarding how the amorphous and unstable project description impacts the assumptions used for the air quality analysis. To begin with, the air quality analysis appears to be based on the “Proposed New Construction” and “Existing to Remain” columns in Table II-2 (Proposed Development Program) of the DEIR, which is apparently tied to the DEIR Conceptual Plan. (DEIR, p. II-13) However, as previously discussed, Table II-2 makes clear that the “proposed construction floor area amounts listed in this table represent **one possible development scenario** that could be developed in conformance with the proposed Specific Plan. **Actual development would be governed by the requirements of the proposed Specific Plan.**” (*Id.*, p. II-13 [Table II-2, Note b], emphasis added) Moreover, the stated floor area requirements can be substantially increased and/or decreased pursuant to “land use exchanges” between the various uses that would be permitted in the Specific Plan. (*Id.*, pp. II-16–17) In other words, the Project remains indeterminate, and the DEIR’s air quality analyses are based on inputs from an illustrative development scenario that cannot possibly reflect the Project’s “maximum possible” air quality impacts, as the DEIR claims in the project description. (*Id.*) The DEIR provides no support for this statement with respect to the air quality analyses.

To further confuse matters, the proposed development program in Table II-2 is based on “floor area” as defined in the yet-to-be-seen Specific Plan. (*Id.*, p. II-13 [Table 11-2, Note a]) As previously noted, however, the Specific Plan would modify the LAMC definition of floor area to exclude activity areas that would generate air quality impacts. According to the DEIR, the Specific Plan definition of “floor area” eliminates at least 110,000 square feet of active production-related spaces that would be counted as floor area under the LAMC definition.³⁰ So, the assumptions inputted into CalEEMod artificially limit the air quality impacts associated with the already amorphous DEIR Conceptual Plan.

To make matters worse, it further appears that the DEIR’s air quality analyses omits at least 120,000 square feet of additional active production and other spaces that may not qualify as LAMC floor area but nonetheless would generate pollutant emissions (for a total of approximately 230,000 square feet of impact-generating areas).³¹ A meaningful analysis should include all areas and uses that would generate pollutant emissions and thereby impact air quality.

It appears that the floor area associated with some of the most intensive project uses has been eliminated in the LAMC and/or Specific Plan definitions, including the Mobility Hub, all of the basecamp areas and outdoor production areas, eating areas and production trailers.

Moreover, the minimum of approximately 230,000 square feet of unanalyzed active space may be substantially understated. As previously discussed, even if the two planned production levels each covered only 50% of the Project Site (they could potentially cover the entire Project Site), that results in an additional approximately 1,000,000 square feet of active project space. It appears, however, that no floor area associated with these production levels were inputted into CalEEMod, so their potential air quality impacts are not analyzed at all.

Therefore, the DEIR significantly understates the Project’s operational air quality impacts, which may result in undisclosed significant impacts. As one example of the potential importance of this omission, Table IV.A-7 indicates that the Project’s operational VOC emissions would be 45 pounds per day, which is just under the significance threshold of 55 pounds per day. (DEIR, p. IV.A-64) That VOC operational impact, however, could easily exceed the significance threshold, resulting in a significant impact, if the DEIR had properly analyzed all of the Project’s impact-generating areas.

³⁰ Specifically, the DEIR indicates that the Project includes 1,874,000 square feet of Specific Plan floor area, but 1,984,000 square of LAMC floor area. (*Id.*, p. II-1)

³¹ The preparers of the DEIR make it exceptionally difficult to figure this out. However, buried in footnote 1 on page II-1 of the project description is a statement that the Project’s “gross” floor area is approximately 2.103 million square feet. The difference between that gross floor area and the Specific Plan floor area is approximately 230,000 square feet (2.103–1.874). That difference matches up with the 230,600 square feet of non-Specific Plan floor area that was added to the Specific Plan floor area to evaluate the Project’s

water and wastewater impacts. That 230,600 square feet includes 194,600 square feet of “basecamp” and 36,000 square feet for the Mobility Hub. (*Id.*, pp. IV.M.2-14 [Table IV.M2-2], [sic] IV.M.2-16 [Table IV.M2-3]) [sic] Therefore, at a minimum, the air quality analyses omit a total of approximately 230,000 square feet of impact-generating uses.

Response to Comment No. 35-53

Please see Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for detailed explanation of how the Project Description is accurate, stable and finite and complies with CEQA, and how the Draft EIR comprehensively analyzed the Project’s potential air quality impacts in accordance with CEQA and based on conservative assumptions and is supported by substantial evidence. Please see Topical Response No. 3, Permitted On-Site Uses, for a detailed explanation of the land uses permitted for the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR’s air quality analysis accounts for the proposed Specific Plan’s Land Use Exchange Program. As discussed therein, the CalEEMod model was developed using representative land use types, modeled such that the most conservative representation of permitted land use emissions was assumed, and the maximum impact scenarios under the land use exchange were analyzed. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for additional discussion regarding the Land Use Exchange Program.

See Response to Comment No. 26-E.1-28 for a discussion of how the CalEEMod model appropriately accounts for the entire Project, not just those elements that might be defined as “floor area.” As discussed therein, electricity and lighting associated with basecamp operations and Mobility Hub were accounted for within the parking structure electricity use. When electricity is used in buildings, the electricity generation typically takes place off-site at power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered the maximum feasible level of mitigation for stack emissions. Therefore, electricity usage associated with the basecamp areas and the Mobility Hub would not change the air emissions conclusions presented in the Draft EIR. See Response to Comment No. 26-36 for a discussion of operational emission sources from basecamps. See Response to Comment No. 26-E.1-28 for a discussion of the operational impacts of the Mobility Hub.

As discussed in Response to Comment No. 26-36, while outdoor production activities may occur above Project Grade, no active production activities or uses would be located in the parking and basecamp areas below Project Grade. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

As shown in Table IV.A-7 in Section IV.A, Air Quality, of the Draft EIR, operational VOC emissions were estimated to be 45 pounds per day, approximately 82 percent of the threshold, and thus impacts would be less than significant. Furthermore, the additional electricity usage associated with basecamp areas and the Mobility Hub would not increase operational VOC emissions. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan; Topical Response No. 3, Permitted On-Site Uses; and Response to Comment Nos. 26-E.1-27 and 26-E.1-28, this conclusion reflects the operational emissions associated with basecamp areas and the Mobility Hub and reflects a conservative estimate of Project operational VOC emissions.

Comment No. 35-54

In addition, the DEIR shows the “net” operational emissions from the Project in Table IV.A-7 and Table IV.A-10, rather than the total expected emissions from the Project. (*Id.*, pp. IV.A-64 and 70) Ostensibly, the EIR preparers subtracted the total emissions from “TVC Operations—Total Permitted Land Uses” on pages 98 through 117 of the Air Quality Report with the CalEEMod results from “TVC Existing” on pages 77 through 97. However, this is not explained in the DEIR or in Table IV.A-7 or Table IV.A-10. Furthermore, the DEIR does not address how existing floor area is calculated, which makes the air quality analysis (and the Project’s impacts) impossible to understand. Specifically, the reader has no way of knowing if the floor area assumptions inputted in CalEEMod are based on the Specific Plan definition of floor area or the LAMC definition of floor area. Being able to comprehend the assumptions used in CalEEMod is critical because the analyses for both regional and localized operational emissions was offset by the proposed emissions from the Project with emissions from existing conditions.

As a final point, the DEIR makes no effort to connect the dots for readers. We had to piece together statements regarding the nebulous project description with descriptions from multiple sections and technical appendices in the DEIR to even begin to understand the inputs used in the CalEEMod and assumptions in the air quality analyses. No cogent explanation of these assumptions exists in the DEIR.

Response to Comment No. 35-54

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project Description is accurate, stable, and finite and meets all of the requirements under CEQA.

Page IV.A-59 in Section IV.A, Air Quality, of the Draft EIR states that regional emission impacts were analyzed based on the “net increase” in criteria pollutant emissions, and page IV.A-68 indicates that the “pollutant increment” is applicable to the LST analysis.

Consistent with the requirements of CEQA, the “net increase” and “increment” represent the difference between the buildout of the Project and existing conditions.

Please see Topical Response No. 2, Definition of Floor Area is Appropriate, for a detailed description of the floor area assumed throughout the analysis. The square footage of land uses in Table II-2, Proposed Development Program, in Section II, Project Description, of the Draft EIR are based on the Specific Plan definition of floor area and are consistent with the square footage by land use included in the CalEEMod modeling provided in Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Appendix FEIR-3 of this Final EIR for a discussion of the Land Use Exchange Program. Additionally, Response to Comment No. 26-E.1-27 explains how the Draft EIR air quality analysis accounts for the proposed Specific Plan’s Land Use Exchange Program. As discussed therein, the CalEEMod model was developed using representative land use types, modeled such that the most conservative representation of permitted land use emissions was assumed. Please see Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR for a detailed explanation of the analytical methods and calculations utilized throughout the Draft EIR air quality and GHG analyses.

Comment No. 35-55

3. The DEIR Air Quality Analyses Are Based on Inaccurate and Self-Serving Assumptions That Do Not Account For Worst-Case Scenarios or Otherwise Result in Inaccurate or Unsupported Analyses.

As previously discussed, the DEIR claims all of the impact analyses evaluate “maximum possible impacts.” The DEIR does so to excuse the unstable project description. As discussed earlier, in addition to the courts having “roundly rejected” this approach, the DEIR’s impact analyses do not actually analyze worst-case impacts. As discussed in more detail below, the inaccurate, unstable and contradictory project description makes it impossible to adequately analyze the Project’s air quality impacts because most of the Project’s characteristics are unknown. In addition, many aspects of the analyses are inaccurate and/or unsupported.

Response to Comment No. 35-55

Please see Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for detailed explanation of how the Draft EIR defines the Project and analyzes impacts to a level appropriate and necessary under CEQA. Please see Topical Response No. 3, Permitted On-Site Uses, for a detailed explanation of the land uses permitted for the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR air quality analysis accounts for the proposed Specific Plan’s permitted land use exchange.

Comment No. 35-56**a. Construction-Related Assumptions.****i. Construction Phasing.**

The air quality analyses are based on two very different construction timelines—a 2026 Buildout and a Long-Term Buildout. The DEIR states that a 2026 Buildout was assumed “to provide a conservative evaluation” of the Project’s air quality impacts, but provides no credible justification as to why it is conservative. (DEIR, p. IV.A-59). Moreover, given that the Specific Plan would allow an infinite number of development options, how does analyzing the air quality impacts associated with one of those unlimited options—the DEIR Conceptual Plan—result in a conservative evaluation, whether based on a 2026 Buildout, a Long-Term Buildout or a construction period in between them?

As discussed in the Ramboll Letter, the DEIR does not properly evaluate the emissions from construction under a Long-Term Buildout. (Ramboll Letter, Comment 10a) The CalEEMod runs for construction air quality emissions do not appear to reasonably estimate the construction impacts at different years, despite the fact that Table IV.A-12 and IV.A-13 in the DEIR show emission estimates for overlapping construction and operation. For example, the emissions for construction presented in Tables IV.A-12 and IV.A-13 are assumed to be 50% of the maximum daily emissions that were found in each respective CalEEMod run. However, the assumption that 50% of the maximum daily emissions reported in CalEEMod would apply to each five-year period is arbitrary and the DEIR does not provide sufficient evidence to justify this assumption. Furthermore, the DEIR needs to provide a reasonable estimate of what the level of construction activity may be over the course of the 20-year construction period to accurately characterize potential construction emissions and associated air quality and health risk impacts.

Response to Comment No. 35-56

This comment is similar to Comment No. 26-E.1-24. Please see Response to Comment No. 26-E.1-24 for a discussion of the Draft EIR’s comprehensive analysis of both the long-term buildout and the 32-month buildout scenarios. Please see Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a detailed explanation of how the Draft EIR defines the Project and analyzes impacts to a level appropriate and necessary under CEQA. The air quality analysis included in the Draft EIR is consistent with the requirements of CEQA and constitutes a reasonable estimate of the air quality impacts which would arise from construction and operation of the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR air quality analysis accounts for the proposed Specific Plan’s Land Use Exchange Program. Additionally, Table IV.A-12 of the Draft EIR presents an analysis of various potential long-term buildout conditions at multiple potential construction years including 2026, 2030, 2035, 2040, and 2043.

See Response to Comment No. 26-E.1-24 for a discussion of the conservative nature of the long-term buildout scenario analysis and the reasonability of the 50 percent of peak activity long-term buildout assumption. See Response to Comment No. 26-E.1-25 for supporting detail pertaining to the CalEEMod air quality analysis.

Comment No. 35-57

ii. Construction Staging.

The DEIR does not evaluate the potential air quality and health risk impacts of the truck activity in the potential offsite truck staging areas. (DEIR, Figures IV.I-4 and IV.I-5) As noted previously, the Project is expected to generate over 102,000 truck trips during construction. Many of these trucks would likely utilize the two offsite staging areas identified in the project description, located within the City on the north side of Venice Boulevard, west of Guthrie Avenue, and on the north side of Venice Boulevard, east of Normandie Avenue. As noted by Ramboll, the air quality analysis does not address the potential construction air quality impacts related to these offsite staging areas at all, despite the significant number of nearby sensitive receptors. (Ramboll Letter, Comment 5) As shown in Figures 2 and 3 of the Ramboll Letter, those sensitive receptors include residences, schools, and a hospital that would be exposed to criteria air pollutant and toxic air contaminant emissions including diesel particulate matter emissions from trucks that use these staging areas. The DEIR should have assessed offsite air quality impacts related to truck staging areas and must be updated to do so.

Response to Comment No. 35-57

Please see Response to Comment No. 26-E.1-17 for a discussion of haul truck staging areas, which would occur on-site.

Comment No. 35-58

iii. Localized Construction Impacts.

The methodology used to assess localized construction impacts of criteria air pollutants (NO_x , CO, PM_{10} , and $\text{PM}_{2.5}$) is flawed for several reasons and does not provide a conservative or worst-case analysis. First, the DEIR uses the mass look-up tables developed by SCAQMD for each source receptor area ("SRA") as a screening-level tool, including the Localized Significant Thresholds ("LST") mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. (DEIR, p. IV.A-43) While the DEIR recognizes that this look-up value can be used for sites larger than five acres, it also states that this is a screening-level tool used only to "determine which pollutants require detailed analysis." (*Id.*) If a project "exceeds the LST look-up values, then SCAQMD recommends that project-specific air quality modeling be performed." (*Id.*)

In that case, the project-specific air quality modeling required is the AERMOD dispersion modeling, which would show how the concentration of pollutants is dispersed from the area and volume sources to nearby sensitive receptors. (*Id.*) Here, the Project exceeds the look-up values for PM₁₀, and PM_{2.5}. However, additional project-specific air quality modeling for PM₁₀, and PM_{2.5} was not completed for the Project. The air quality analysis needs to be updated to include project-specific air quality modeling using the AERMOD dispersion modeling to demonstrate the dispersion of PM₁₀, and PM_{2.5} emissions from the Project Site to sensitive receptors, and the potential impacts on sensitive receptors.

In addition, the five-acre look-up tables are far too simplistic to use for this complex Project Site, Project and construction schedule. The five-acre look-up provides a conservative analysis as a screening-level tool in certain circumstances when the actual construction area is greater than five acres because the approach assumes that all onsite emissions would occur within a five-acre area. Per the DEIR, this approach “over-predicts potential localized impacts (*i.e.*, more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors).” (*Id.*) As such, if the actual area of active construction is less than five acres, using the five-acre look-up table would no longer be a conservative analysis as it would erroneously show emissions dispersed over a larger area than actually anticipated during construction. In those cases, a different look-up value should be used, such as one or two acres, to ensure the analysis remains conservative. (Ramboll Letter, Comment 6c)

Here, a simple change to the sequence of project construction could entirely throw off the modeling. For example, Hackman could choose to construct first the above-grade parking structure that is contemplated as part of the DEIR Conceptual Plan, which is proposed on an area less than five acres, then continue with construction on a piecemeal basis on other fewer-than-five-acre sections on the Project Site until the entire Project is constructed. Under this hypothetical construction schedule, the five-acre look-up would no longer be a conservative assumption, or provide an accurate assessment of localized impacts related to construction. As we understand it, nothing limits Hackman’s ability to engage in continuous construction on sections of the Project Site that are less than five acres, or mandates that construction occur only on portions of the Project Site that are larger than five acres.

Response to Comment No. 35-58

Please see Response to Comment No. 26-E.1-21 for a discussion relating to the analysis of localized air quality impacts, applicability of the LST methodology and the appropriateness of the 25-meter and 5-acre look-up criteria. Additionally, the commenter’s assertion that “the Project exceeds the look-up values for PM₁₀, and PM_{2.5}” ignores the mitigated results presented in Tables IV.A-10 and IV.A-11 in Section IV.A, Air Quality, of the Draft EIR. Project emissions would not exceed the LST look-up values for any pollutant

during operations and would not exceed the look-up values for any pollutant during construction after the application of applicable mitigation.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which used the AERMOD model. The HRA confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 35-59

Second, the DEIR and the Air Quality Report use SCAQMD's 25 meter look-up for all sensitive receptors, even though there are receptors, including Broadcast Center, far closer than 25 meters from the Project Site. As coverage, the DEIR includes a blanket statement that, even though Broadcast Center is adjacent to the Project Site,

[i]n accordance with SCAQMD recommendations, the LST receptor distance was assumed to be 25 meters. **All other existing air quality-sensitive uses are located at greater distance from the Project Site and would experience lower air quality impacts** from potential sources of emissions at the Project Site due to atmospheric dispersion effects. (*Id.*, p. IV.A-31, emphasis added)

However, this is simply a false assumption which arbitrarily increases the distance between the BC Site and the Project Site from 0 meters to 25 meters, essentially ignores that the DEIR Conceptual plan includes two new private streets contiguous to the BC Site, and thereby diminishes and obfuscates the Project's localized air quality impacts on Broadcast Center residents, which are not directly evaluated in the DEIR at all.

Third, the DEIR does not accurately identify the closest sensitive receptors to the Project Site. Figure IV.A-4 omits several sensitive receptors that are located closer to the Project Site than some receptors identified in the Figure, including: (1) future residential uses and sensitive receptors at 3rd & Fairfax Project; (2) residential uses at the Gilmore Adobe, 6333 W. Third Street; (3) The Fairfax Apartment, W. 1st Street and 105 S. Fairfax Avenue; (4) SureStay Hotel by Best Western on Beverly and Genesee Avenue, 7721 Beverly Boulevard; (5) Beverly Inn, 7701 Beverly Boulevard; (6) School of Rock, 7801 Beverly Boulevard; and (7) Short Stories Hotel, 115 S. Fairfax Avenue. Figure IV.A-4 is also misleading in that it only identifies the "closest" sensitive receptors, but does not identify that the Project is surrounded by residential uses to the west, north, and east. Ramboll has prepared an updated figure that more accurately shows the number of sensitive receptors around the Project Site. (Ramboll Letter, Figure 1)

Response to Comment No. 35-59

Please see Response to Comment No. 26-E.1-21 for a discussion of the 25-meter LST criterion. As discussed therein, page 3-3 of the SCAQMD LST methodology provides the following specific guidance: “The closest receptor distance on the mass rate LST look-up tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” This comment contradicts the SCAQMD LST methodology for receptors closer than 25 meters. Furthermore, the statement quoted from the Draft EIR, which states that all receptors further from the Project Site than the analyzed 25-meter LST receptor distance would experience lower impacts than the analyzed 25-meter LST receptor distance analysis, is correct in the context of SCAQMD LST methodology guidance given atmospheric dispersion of emissions. Further, as discussed in Response to Comment No. 26-26, as instructed by SCAQMD guidance, the LST lookup tables for a 25-meter receptor distance would be applicable to receptors located less than 25 meters from the Project Site. Please see Response to Comment Nos. 26-26 and 35-46 for a discussion of sensitive receptors.

Comment No. 35-60

Fourth, according to Tables IV.A-9, IV.A-10 and IV.A-11, the DEIR uses thresholds from SRA 2 for both NO_x and CO localized emissions.³² However, the Project Site falls within SRA 1.³³ (Ramboll Letter, Comment 6b) In addition, the analysis does not address the federal 2010 1-hour NO₂ standard.³⁴ The DEIR must evaluate the potential localized impacts relative to the federal 2010 1-hour NO₂ standard.

³² <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>.

³³ <https://data-scaqmdonline.opendata.arcgis.com/maps/814d6e7a791044dabcb3d0d4b8af4df9/explore?location=34.086950%2C-118.600650%2C10.48>.

³⁴ <https://www.epa.gov/criteria-air-pollutants/naaqs-table>.

Response to Comment No. 35-60

This comment is similar to a portion of Comment No. 26-E.1-21. Please see Response to Comment No. 26-E.1-21.

Comment No. 35-61**iv. Dewatering Activities.**

The DEIR states that project construction would include potential dewatering, given the high water table at the Project Site. (DEIR, p. IV.G-28) The DEIR further states that

dewatering activities are anticipated during construction, which would require the installation and operation of temporary pumps and filtration in accordance with National Pollutant Discharge Elimination System (“NPDES”) requirements. (*Id.*, p. IV.G-9) However, the DEIR does not account for dewatering activities in the air quality analysis. Because the DEIR acknowledges that dewatering activities are anticipated, emissions from the dewatering equipment (e.g., pumps, trucks, etc.) must be evaluated. (Ramboll Letter, Comment 14)

Response to Comment No. 35-61

This comment is similar to Comment No. 26-E.1-30. Please see Response to Comment No. 26-E.1-30.

Comment No. 35-62

v. Potential Odors.

The Project Site is located within the City’s Methane Zone and is therefore impacted by naturally occurring hydrogen sulfide. According to Ramboll, in addition to posing health risks, hydrogen sulfide is a highly odorous gas. (Ramboll Letter, Comment 15) The DEIR should evaluate the potential impacts associated with the release hydrogen sulfide and other odorous compounds released during project construction (particularly during soil excavation) and operation (from the tar collection system in the southwestern corner of the Project Site and methane mitigation systems for buildings on the Project Site).

b. Operational-Related Assumptions.

i. Diesel-Fueled Trucks and Buses.

As previously discussed, the DEIR claims that daily truck trips for the Project would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. (DEIR, p. IV.A-72) The DEIR relies on these assumptions to justify not preparing an I-IRA to assess DPM and other TAC emissions from mobile sources during operation of the Project. CalEEMod shows approximately 559 one-way trips or 279 round trips per day during project operation, far greater than 100 trucks per day. (Air Quality Report, pp. 102–103) This is an example where the DEIR uses understated data that does not reflect a worst-case scenario for an impact analysis.

In addition, the project description states that shuttle buses would use the Mobility Hub. (DEIR, pp. II-26, 30 [Figure II-9]) However, the DEIR provides almost no information about the shuttle buses. It is not clear whether the shuttle buses use diesel or gasoline, how many buses are anticipated per day, or whether the shuttle buses would enter the Project Site on either of the new private streets adjacent to Broadcast Center. The impacts of

these buses is completely unknown to the public. A worst-case scenario analysis would have provided answers to these basic questions and included a corresponding impact analysis.

ii. Localized Operational Impacts.

Like the regional construction air quality analysis, the DEIR's methodology used to assess the Project's localized operational impacts is flawed. The DEIR uses the 25 meter look-up tables to assess impacts to sensitive receptors at a 25-meter distance and beyond. However, this approach does not make sense for this Project because the Broadcast Center building, which is only seven feet from the Project Site, is much closer than 25 meters. In addition, the DEIR's analysis of localized impacts simply ignores the two new private streets that would be sited adjacent to the western and southern boundaries of the BC Site pursuant to the DEIR Conceptual Plan. These six-lane and four-lane streets would support substantial traffic adjacent to the windows and balconies of Broadcast Center residents. The proper way to proceed would have been to prepare a project-specific assessment using AERMOD to assess LST for criteria air pollutants. (Rambo!! Letter, Comment 6) The AERMOD modeling would demonstrate how pollutants, like PM_{2.5} and PM₁₀, would disperse from the area and volume sources to nearby sensitive receptors, in particular Broadcast Center, the closest residential use to the Project Site.

Response to Comment No. 35-62

Regarding potential odors, this comment is similar to Comment No. 26-E.1-31. Please see Response to Comment No. 26-E.1-31 for further discussion of this topic.

Regarding air quality operational-related assumptions, this comment is similar to Comment Nos. 26-29, 26-E.1-16, 35-50, 35-51, and 35-58. Refer to Response to Comment Nos. 26-29, 26-E.1-16, 35-50, 35-51, and 35-58 for further discussion of this topic.

Please see Response to Comment No. 26-E.1-16 for a discussion of truck trip estimates associated with Project operations. Please see Response to Comment No. 26-E.1-23 for a discussion of the vehicle trip effects of the Mobility Hub, which would be expected to reduce vehicle trips associated with Project operations.

Please see Response to Comment No. 26-26 for a discussion of the 25-meter LST criterion. Please see Response to Comment No. 26-E.1-21 for an explanation of the appropriate nature of the LST analysis for operational Project emissions, including such emissions from on-site roadways.

Comment No. 35-63**iii. Production Levels.**

As previously discussed, it appears the DEIR did not consider the air quality impacts, including regional emissions, localized emissions, TACs and other potential health impacts to nearby sensitive receptors, related to the two planned “production levels,” which apparently include multiple basecamp areas and other production-related areas. Specifically, the DEIR excluded the production levels from the CalEEMod modeling. We assume that this was done because the Specific Plan’s proposed definition of floor area specifically excludes basecamp areas, outdoor production area, production trailers, sets/facades and the like. (DEIR, p. II-1 [n. 1])

However, it is undeniable that the basecamps areas and other activities contemplated on the production levels are impact-generating uses. For example, basecamps are defined as

areas at, near, or within a filming location where critical production activities can be coordinated. These areas provide for active uses (including but not limited to loading, wardrobe, hair, make-up, craft services, etc.) and passive uses (including but not limited to parking, storage of mobile facilities, power generators, support vehicles, etc.) all related to production activities. (*Id.*, p. II-7)

A meaningful analysis of the Project’s air quality impacts would include the basecamps and other planned activities within the production levels in CalEEMod and assumed the maximum number of basecamp areas running simultaneously adjacent to the nearest sensitive receptor, which is Broadcast Center. The air quality analysis must be updated to address this significant omission.

Response to Comment No. 35-63

Please see Response to Comment Nos. 26-E.1-27, 26-E.1-28, and 35-53 for a discussion on the conservative nature of the CalEEMod land use modeling and how the Draft EIR analyzed the potential physical environmental impacts of all proposed uses, areas and activities regardless of whether they are considered to be within the definition of floor area. Response to Comment Nos. 26-28 and 26-E.1-28 provide a detailed discussion regarding potential emissions related to production, basecamp operations, and the Mobility Hub.

As further discussed in Response to Comment No. 26-E.1-28, CalEEMod does not calculate pollutant emissions (except for GHG emissions) and related TAC emissions from building electricity because power plants are existing stationary sources permitted by air

districts and/or the USEPA and pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users.¹³⁶ Therefore, electricity usage associated with the production areas, basecamp areas and the Mobility Hub would not change the air emissions or conclusions in the Draft EIR.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities. Sources analyzed in the HRA include operations in production, basecamp areas, and the Mobility Hub (e.g., vehicular and truck activity and char broilers) and in close proximity to the Broadcast Center Apartments as recommended in this comment. As discussed in Response to Comment No. 26-E.1-2, the quantitative HRA confirms the Draft EIR's conclusion that health risks from the Project would remain below applicable significance thresholds and impacts would be less than significant.

Comment No. 35-64

iv. Mobility Hub.

The DEIR Conceptual Plan does not even include an illustrative location for the Mobility Hub. As previously disclosed, a combined review of a graphic in the transportation section of the DEIR and a sheet in the Application Plans indicate that it might be located on the lower production level in the southwestern corner of the Project Site. However, given that the DEIR Conceptual Plan is just one of an unlimited number of potential development scenarios, Hackman could place the Mobility Hub anywhere, including adjacent to Broadcast Center. Of course, the DEIR did not analyze this worst-case air quality impact because the DEIR engages in the pretense that the DEIR Conceptual Plan reflects the "maximum possible impacts." An actual worst-case scenario analysis would be based on potentially locating the Mobility Hub next to the BC Site. Broadcast Center would vigorously oppose that location, but the point is that Hackman could do exactly that following the adoption of the Specific Plan with no further environmental review. Therefore, it is incumbent on the City to provide a true worst-case analysis now to apprise the public and decisionmakers of the Project's actual maximum impacts.

Response to Comment No. 35-64

This comment is similar to a portion of Comment No. 35-51. Please see Response to Comment Nos. 26-E.1-28 and 35-51 for a discussion of the Draft EIR's analysis of the

¹³⁶ California Air Pollution Control Officers Association, CalEEMod User's Guide, Appendix C, Emission Calculation Details for CalEEMod (Page C-53), April 2022.

Mobility Hub, which would be expected to reduce vehicle trips associated with Project operations.

Comment No. 35-65

v. Visitor Trips.

As discussed in more detail in Section II.Q, *infra*, the DEIR's air quality analyses do not properly account for visitor or audience trips to the Project Site during operations. (Ramboll Letter, Comment 8; LLG Letter, p. 19-21) The Project's VMT Calculator only includes "employees" trips taken within the land use "Studio, Production, and Office." The inputs from the VMT calculator are used in the CalEEMod to determine air emissions from operations of the Project. As such, if the traffic assumptions do not accurately reflect the true scope of the Project, then the air quality results from CalEEMod will be inaccurate. In this case, by omitting visitor and audience trips, the CalEEMod assumptions underrepresent the Project's VMT. As a result, the analysis underestimates the daily trip rate and operational VMT, and therefore underestimates the associated mobile source operational emissions.

Response to Comment No. 35-65

Please see Response to Comment No. 26-E.1-23 for a discussion of trip generation rates, which included trips that would be generated by visitors. As discussed therein, the total trips and related VMT accounts for the total Project development and is not limited to "employee" trips.

Comment No. 35-66

vi. Other Permitted Uses.

As previously discussed, the DEIR's project description includes contradictory information regarding the permitted uses on the Project Site. The DEIR Conceptual Program in Table II-2 includes just five uses—sound stages, production support, production office, general office and retail. Elsewhere in the project description, however, the DEIR states that the Specific Plan will include numerous other permitted uses. (*Id.*, pp. II-15–16) The DEIR further provides that the Specific Plan will allow "all other permitted uses in the C2 zone unless expressly prohibited in the Specific Plan." (*Id.*, p. II-16)

As a result, the air quality analyses in the DEIR do not adequately evaluate the extensive list of potential land uses. Most of those permitted uses are not analyzed in the CalEEMod runs, which focus solely production offices (as general office building), sound stages (as industrial park), production support (as user defined industrial), and retail (as restaurant and strip mall). Several of the related land uses proposed in the project description

(including child care and educational facilities, medical facilities, warehouses, and museum exhibits and theatres) would have different associated emissions and energy and water demands than the limited uses analyzed for air quality purposes. Therefore, the Project's air quality analysis would be inaccurate if the Project is developed for any of the other permitted use and those analyses almost certainly do not reflect the Project's "maximum possible impacts."

Response to Comment No. 35-66

Please see Topical Response No. 3, Permitted On-Site Uses, for a detailed explanation of the land uses permitted for the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR air quality analysis accounts for the proposed Specific Plan's Land Use Exchange Program. As discussed therein, the CalEEMod model was developed using representative land use types, modeled such that the most conservative representation of permitted land use emissions was assumed. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Appendix FEIR-3 of this Final EIR for a discussion of the Land Use Exchange Program and the maximum impact scenarios analyzed in the Draft EIR.

Comment No. 35-67

vii. Land Use Exchange—Maximum Air Emissions.

The DEIR claims that the "maximum air emissions" from implementing a "land use exchange" would be exchanging 100,000 square feet of production support space for 100,000 square feet of additional sound stages. (DEIR, p. IV.A-63, 64 [Table IV.A-7, note c]) This means that the DEIR Conceptual Plan (one of an infinite number of development scenarios) would include 1,400,000 square feet of production office, 450,000 square feet of sound stages, 20,000 feet of retail space, and only 4,000 square feet of production support use.

This exchange is nonsensical. How could the sound-stage floor area increase by 100,000 square feet without a requisite increase in the production support? This exchange appears to allow Hackman to shift even more production support space to basecamp areas, the floor area of which is ignored in the air quality analyses. The DEIR does not explain why this exchange is realistic or how it represents a worst-case scenario for project emissions. To the contrary, it appears to allow a further opportunity to conceal a substantial portion of the Project's pollutant emissions.

Response to Comment No. 35-67

Please see Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a detailed explanation of the Land Use Exchange Program and the

Project's regulatory framework under the proposed Specific Plan. Please see Topical Response No. 3, Permitted On-Site Uses, for a detailed explanation of the land uses permitted for the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR air quality analysis accounts for the proposed Specific Plan's Land Use Exchange Program. Refer to Appendix FEIR-3 of this Final EIR for a summary of the maximum impact scenarios analyzed in the Draft EIR.

Comment No. 35-68

c. Other CalEEMod Modeling Issues.

i. Outdated Modeling.

As discussed in the Ramboll Letter, the modelling used in the air quality analyses contains numerous errors. In addition to the errors mentioned previously, the Ramboll Letter identifies additional concerns in Comments 10 and 20. For example, the DEIR should have used the most recent iteration of the CalEEMod and Emissions Factor ("EMFAC") models, 2020.4.0 version of CalEEMod and EMFAC2021.

Response to Comment No. 35-68

Please refer to Response to Comment No. 26-E.1-25 with regard to the adequate modeling and technical documentation for the air quality and GHG analyses in the Draft EIR. As discussed therein, the documentation and CalEEMod output files provided in Appendix B of the Draft EIR properly identify Project construction and operational impacts. Please refer to Response to Comment No. 26-E.1-35 for an explanation as to the applicability of the CalEEMod 2020.4.0 version used in the Draft EIR and a discussion of CalEEMod 2022.1.1 results included for informational purposes in Appendix FEIR-9 of this Final EIR.

Comment No. 35-69

ii. Missing Output Files.

The Air Quality Report (Appendix B) does not include the complete technical documentation, so it is not clear if the peak daily emissions are accurately represented in the DEIR. The missing output files prevent the reviewer from verifying the technical analyses and results. (Ramboll Letter, Comment 10)

Specifically, page 2 of the Air Quality Report includes a table of contents for all CalEEMod Output files corresponding to the 2026 Buildout and Long-Term Buildout scenarios. However, the actual output reports provided are incomplete. First, the TVC Operations—Total Permitted Land Uses run on page 264 seems to have several pages of outputs

missing. Second, the table of contents lists two runs as “2043 Buildout” runs. However, the corresponding runs in the output files have 2045, not 2043, as the operational year. Third and most important, there are no summer output runs provided in the Air Quality Report. SCAQMD Mass Daily Air Quality Significance Thresholds³⁵ are for maximum daily emissions, which should be calculated as the maximum daily emissions across both summer and winter seasons. These missing output files must be provided so the public can fully understand the Project’s air quality impacts.

³⁵ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

Response to Comment No. 35-69

Please refer to Response to Comment No. 26-E.1-25 with regard to the adequate technical documentation for the air quality and GHG analyses in the Draft EIR. The commenter incorrectly asserts that the CalEEMod output file provided in Appendix B of the Draft EIR is missing pages. As discussed in Response to Comment No. 26-E.1-25, documentation and CalEEMod output files provided in Appendix B of the Draft EIR properly identify Project construction and operational impacts. Please refer to Response to Comment No. 26-E.1-35 for an explanation as to the applicability of the CalEEMod 2020.4.0 version used in the Draft EIR and a discussion of CalEEMod 2022.1.1 results included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR).

Comment No. 35-70

F. The DEIR’s Analysis of the Project’s Historical Resources Impacts Is Inadequate.

The DEIR’s analysis of the Project’s impacts on historical resources is inadequate for the reasons set forth below.

1. The Development of the Project Would Materially Impair the Historic Significance of the Primary Studio Complex.

As previously discussed in detail, it is difficult to assess the Project’s environmental impacts because the proposed development is undefined. In any event, the development of the Project, whether or not in accordance with the DEIR Conceptual Plan, Height Zone Map and Proposed Development Program, would materially impair the historic significance of the Primary Studio Complex for several reasons. (SRI Letter, pp. 1-5)

First, as discussed in the SRI Letter, one would assume based on a review of the DEIR that almost no above-grade new construction would occur to the north of the Primary Studio Complex. (*Id.*, p. 2) However, the DEIR Conceptual Plan is just one of a limitless

number of development options, and in fact new buildings are allowed between Beverly Boulevard and the Primary Studio Complex in “Height Zone A—Viewshed Restoration Area.” (*Id.*) Notwithstanding Hackman’s negotiated agreement with the Los Angeles Conservancy to preserve in part the view of the Primary Studio Complex from Beverly Boulevard, Height [sic] Zone A does not promote “view restoration” because one or more buildings of up to 58 feet in height (*i.e.*, six-story buildings) are permitted in Height Zone A. (*Id.*)

While Project Design Feature CUL-PDF-1 states that “new buildings immediately adjacent to the Primary Studio Complex [should be located] to the east and south of the Service Building and to the west of the Studio Building,” new buildings are not necessarily prohibited because this provision seemingly precludes new construction to the north that is “immediately adjacent” to the Primary Studio Complex. In other words, the project design feature would not preclude new buildings that are five feet, or 10 feet, or 20 feet from the Primary Studio Complex. (*Id.*)

Response to Comment No. 35-70

This comment is substantially similar to Comment Nos. 26-E.2-2 and 26-E.2-3. Refer to Response to Comment Nos. 26-E.2-2 and 26-E.2-3.

Comment No. 35-71

Second, contrary to the DEIR and Historic Resources Technical Report (“Historic Report”) prepared by Historic Resources Group for the Project (DEIR, Appendix C.1), it is likely that the 1969 Mill Addition and the 1976 Support Building Addition (collectively, “Additions”) are historical resources. (SRI Letter, p. 2) The DEIR and Historic Report attempt to disqualify the Additions as historical resources by artificially limiting the period of significance to 1952 to 1963 and then concluding that the Additions are not historical resources because they were constructed in 1969 and 1976 (*i.e.*, after 1963). (*Id.*) The only justification offered for using the 1952-1963 period of significance is that the Primary Studio Complex was constructed in 1952 and then, in 1963, “CBS abandoned its vision of a single unified production facility and moved its filmed programming operations to the CBS Studio Center lot in Studio City.”³⁶ (*Id.*, pp. 2-3; DEIR, IV.B-24; Historic Report, p. 34)

However, the period of significance for the Project Site did not end in 1963. “Period of significance” refers to the dates when a property achieved the historic significance necessary to qualify for listing on the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). (SRI Letter, p. 3) The period of significance for the television studio on the Project Site is the duration in which the property actively contributed to the growth and popularity of commercial television, which clearly did not end in 1963. As recognized in the Historic Report, a variety of groundbreaking and innovative

television shows were shot there with live studio audiences throughout the 1960s and 1970s, including the Smothers Brothers Comedy Hour (1967–1970), All In The Family (1971–1979), Maude (1972–1978) and the Carol Burnett Show (1967–1978). (*Id.*) Accordingly, the DEIR and Historic Report “cannot credibly omit these and other television shows that became part of the nation’s shared cultural experience during these two decades.” (*Id.*)

The DEIR and Historic Report’s brief discussion of the period of significance undercuts the artificially shortened period by stating that (1) from 1952 to 1963, television use was growing rapidly and networks expanded their operations and facilities nationwide and (2) the period from 1952–1963 “captured the postwar evolution of CBS and with the construction of Television City” and “represents the maturation of commercial television.” (*Id.*) As emphasized by SRI, “none of this was less true in 1979 than it was in 1963.” (*Id.*) Indeed, even after 1963, CBS continued to grow and expand its domination of American television into the 1970s, and constructed the Additions in 1969 and 1976, demonstrating its continued demand for and expansion of television production facilities. (*Id.*) For these reasons, the period of significance of the CBS television studio ended no earlier than 1979. (*Id.*)

Moreover, sufficient time has passed to provide a scholarly perspective on the potential historical significance of the 1969 Mill Addition and the 1976 Support Building Addition. (*Id.*) As analyzed in the SRI Letter, both of the Additions were designed by master architect Gin Wong. (*Id.*) As stated in the Historic Report, Gin Wong coordinated the architectural design and construction of the Primary Studio Complex for Pereira and Luckman. (*Id.*) Because the Additions were erroneously excluded from consideration as historical resources based on the artificially limited 1952–1963 period of significance, the Additions must be reevaluated under the more appropriate period of significance of 1952–1979 to determine whether they are historical resources that alter the overall historic significance of the Primary Studio Complex. (*Id.*)

³⁶ The SRI Letter also notes a disconnect between the stated reason for ending the period of significance in 1963 and the evidence cited to support it. (SRI Letter, p. 3) As stated in the report, “[t]he stated reason is that, in 1963, CBS decided to move filmed programming to Studio City. But the subsequent discussion focuses entirely on the expansion of television programming, not on moving filming to Studio City. This disconnect arises because the reliance on a decision to abandon a unified facility is an artificial construct that has no bearing on the making of some of CBS’s most historically significant television shows throughout the 1960s and 1970s. In other words, the period of significance cannot be based on what did not happen at Television City, but what did happen there.” (*Id.*)

Response to Comment No. 35-71

This comment is substantially similar to Comment No. 26-E.2-4. Refer to Response to Comment No. 26-E.2-4.

Comment No. 35-72

Third, the DEIR and Historic Report understate or entirely omit the Project's overall impact on the integrity of the existing resources. (*Id.*) Integrity is the ability of a historical resource to convey its historic significance. (DEIR, IV.B-54) The National Park Service defines the seven aspects of integrity as location, design, setting, materials, workmanship, feeling, and association. (*Id.*)

As stated above, it is likely that the Additions qualify as historical resources and enlarge the overall historic and architectural significance of the Primary Studio Complex. (SRI Letter, p. 3) If that is the case, then the proposed demolition of the Additions would materially impair the overall historical resource with respect to all aspects of integrity and therefore result in a substantial adverse change in the significance of that overall historical resource. (*Id.*, p. 4, see Cal. Pub. Res. Code§ 21084.1)

In addition, the proposed demolition of the southern portion of the Service Building and removal of up to two bays of the Studio Building's west wall constitute substantial losses that would further compromise the integrity of the overall historical resource. (SRI Letter, p. 4)

Response to Comment No. 35-72

This comment is substantially similar to Comment No. 26-E.2-5. Refer to Response to Comment No. 26-E.2-5.

Comment No. 35-73

Moreover, as illustrated in the SRI Letter, given the broad flexibility granted by the Specific Plan, the Primary Studio Complex could be completely encircled by new construction that, contrary to the DEIR, would envelop it and result in a significant loss of integrity with respect to setting, feeling and association. (*Id.*) To the north of the Primary Studio Complex, Hackman could develop one or more new buildings up to 58 feet in height within Height Zone A. (*Id.*) To the west, east and south of the Primary Studio Complex, Height Zone D allows a base height of 88 feet, but allows a maximum of 225 feet over 40% of the Project Site. (*Id.*) The DEIR even states that the Project "would" include two new buildings to the east and west of the Primary Studio Complex with heights of 225 feet. (*Id.*) In addition, the DEIR Conceptual Plan shows new office and sound stage buildings south of the Primary Studio Complex. (*Id.*) Moreover, new construction would be permitted on top of the Primary Studio Complex within Height Zone E—a rooftop zone that would apparently allow a rooftop addition of up to 36 feet above the existing parapet of the Studio Building for a length of approximately 350 feet. (*Id.*) Height Zone F is another rooftop zone that would permit a variety of non-occupiable structures on top of the Primary Studio Complex north of Height Zone E. (*Id.*)

Even if construction proceeded in accordance with the DEIR Conceptual Plan, contrary to the DEIR's representations, the architectural features of the Primary Studio Complex would not remain visible because new construction would surround the Primary Studio Complex and result in a significant loss of integrity with respect to setting, feeling and association. (*Id.*)

As further stated in the SRI Letter, the "setting of the television studio includes the relationships of surrounding features, reflects the designer's intent, and indicates function. The new development envisioned in the [DEIR] Conceptual [] Plan would diminish integrity of setting by changing dramatically the existing physical environment and character of place by surrounding the Primary Studio Complex both horizontally and vertically with new construction." (*Id.*) For example, the proposed height limit of 58 feet in Height Zone A permits the construction of one or more intrusive structures between Beverly Boulevard and the north façade of the Primary Studio Complex, which would certainly cause major visual intrusions and interrupt the continuity of the historic setting. (*Id.*) Similarly, the development of large buildings on all other sides of the Primary Studio Complex within Height Zone D, and the substantial new additions on top of the Primary Studio Complex within Height Zones E and F, would indeed cause the same intrusion issues. (*Id.*)

Feeling is the expression of a historic sense or a conveyance of historic character. (*Id.*, p. 5) As discussed above, the new buildings allowed in Height Zones C and D would eclipse the Primary Studio Complex with heights of up to 160 feet in Height Zone C and up to 225 feet in Height Zone D. This would substantially impair the original relationship with neighboring buildings and structures and therefore, impair integrity of feeling. (*Id.*)

Association is the link between an important event or trend and resource, wherein the resource conveys that relationship. (*Id.*) As stated in the SRI Letter, integrity of association would be impaired through additions and subtractions to the Primary Studio Complex and surrounding new development by altering the essential physical features that conveyed its appearance during the period of significance. (*Id.*)

Having said all this, it is not the case, as the DEIR repeatedly suggests by using the word "would," that the Project would proceed in accordance with Conceptual Site Plan. (*Id.*) While development would apparently be subject to the restrictions in the Height Zone Map, the actual development could be even more impactful to integrity of setting, feeling and association than the Conceptual Site Plan, which is an illustrative scenario. (*Id.*) As previously discussed, while the Conceptual Site Plan includes no material above-ground buildings to the north of the Primary Studio Complex, the developer could choose to construct buildings there as tall as the Primary Studio Complex. (*Id.*)

Response to Comment No. 35-73

This comment is substantially similar to Comment Nos. 26-E.2-5 and 26-E.2-6. Refer to Response to Comment Nos. 26-E.2-5 and 26-E.2-6.

Comment No. 35-74**2. The DEIR Impermissibly Defers the Preparation of a Historic Structure Report.**

The historic resource analysis in the DEIR includes Project Design Feature CUL-PDF-2 (DEIR, p. IV.H-20), which requires the preparation of a Historic Structure Report (“HSR”) after the entitlements for the Project have been approved. This is a significant flaw. In the absence of a contemporaneous HSR comprehensive information regarding the existing onsite historical resources, the DEIR’s analysis and conclusions regarding the Project’s potential impact on those resources cannot be substantiated . [sic] (SRI Letter, p. 5) This analysis is critical to clarify what mitigation measures are necessary to minimize the Project’s adverse effects on the character-defining features of the historical resource. (*Id.*) As discussed in the SRI Letter, the HSR must be prepared now and in accordance with the National Park Service’s Preservation Brief 43: The Preparation and Use of Historic Structure Reports. (*Id.*) Again, because the DEIR Conceptual Plan is an illustrative scenario and not necessarily reflective of what might actually be constructed, the preparation of an HSR in conjunction with the DEIR is necessary to guide the development of the Project and demonstrate to the public and decisionmakers that the Project would not materially impair the Primary Studio Complex and other historical resources on the Project Site. (*Id.*)

Response to Comment No. 35-74

This comment is substantially similar to Comment No. 26-E.2-7. Refer to Response to Comment No. 26-E.2-7.

Comment No. 35-75**3. The DEIR Fails to Analyze the Project’s Potentially Significant Impact on Surrounding Historical Resources.**

The DEIR and Historic Report solely focus on preserving the visual conditions and scenic integrity of the north façade of the Primary Studio Complex, but entirely fail to consider the Project’s adverse visual effect on surrounding historic properties, including the Original Farmers Market, Gilmore Adobe, Chase Bank, Fairfax Theater, Air Raid Siren No. 25, Beverly Fairfax Historic District, and the Miracle Mile North Historic Preservation Overlay Zone. (SRI Letter, p. 5) As discussed in the SRI Letter, a comprehensive visual resource

or viewshed study is needed to evaluate existing visual conditions to, from and within the Project Site, and assess scenic integrity, visual quality, and viewer sensitivity regarding the existing landscape/streetscape characteristics. (*Id.*)

As illustrated above regarding the Project's proposed Height Zones and intrusive maximum building heights ranging from 130 to 225 feet above "Project Grade," which is already up to 15 feet above existing grade adjacent the Gilmore Adobe, it is apparent that the Project would materially impair the historic significance of the neighboring Gilmore Adobe and Original Farmers Market just south of the Project Site. (*Id.*) Indeed, according to the SRI Letter, "any interruption of the existing horizon line would have an obstructive effect on the historic properties by altering the character, setting, feeling and viewshed that make them eligible for listing in the NRHP and/or CRHR." (*Id.*, pp. 5–6) In addition, the introduction of buildings, signage, and nighttime lighting that are incompatible, out of scale and proportion and/or out of character with the Gilmore Adobe and Original Farmers Market would have a demonstrably negative aesthetic effect (*i.e.*, an effect that diminishes the character or quality of the historic property) to these neighboring historical resources. (*Id.*, p. 6)

Response to Comment No. 35-75

This comment is substantially similar to Comment No. 26-E.2-8. Refer to Response to Comment No. 26-E.2-8..

Comment No. 35-76

Furthermore, while the noise analysis in the DEIR considers building damage impacts from onsite construction (DEIR, pp. IV.I-60–62), including impacts to the Gilmore Adobe, the scope of the analysis is inadequate given the extremely sensitive nature of the adobe's unreinforced masonry building type and the proximity of the adobe to the Project Site's southern property line (approximately 130 feet) (SRI Letter, p. 6). According to the SRI Letter, a preconstruction survey of the structure should be performed by a structural engineer who specializes in adobe architecture to identify structural and seismic deficiencies that may be worsened by ground-borne vibration during construction, and a vibration management and monitoring plan should be prepared to ensure against damage caused by vibration or differential settlement caused by vibration during Project construction and operation activities. (SRI Letter, p. 6)

Response to Comment No. 35-76

Refer to Response to Comment Nos. 26-139 and 363-2 for a discussion of the Gilmore Adobe. As discussed therein, potential vibration impacts would be less than significant.

Comment No. 35-77

Finally, as discussed in the SRI Letter, the DEIR and Historic Report fail to consider the potentially significant impact that the Project's anticipated cut-through traffic would have on the Beverly Fairfax Historic District located just north of the Project Site. (*Id.*) The DEIR omits any discussion of the increased traffic expected within the historic district and how it might adversely affect the pedestrian environment and diminish the integrity of the historic district, which is comprised of narrow residential streets. (*Id.*) Accordingly, the SRI Letter states the DEIR should include a residential neighborhood protection plan or a neighborhood traffic management plan to mitigate traffic and spillover parking impacts to the historic district. (*Id.*)

Response to Comment No. 35-77

This comment is substantially similar to Comment No. 26-E.2-10. Refer to Response to Comment No. 26-E.2-10.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the Project's proposed NTMP, which would implement traffic calming measures to address potential cut-through trips. Refer also to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply and that spillover parking into adjacent neighborhoods and properties is not anticipated.

Comment No. 35-78**G. The DEIR's Analysis of the Project's Archaeological Resources Impacts Is Inadequate.**

The DEIR's analysis with respect to archaeological resources is inadequate largely due to the absence of an underlying archaeological resources report and the DEIR's omission of any substantive discussion regarding the protohistoric and historical archaeology of the Project Site. These omissions are particularly glaring given that the Project Site is located in one of the most archaeologically significant regions in the State of California.

1. The DEIR Is Unsupported By an Archaeological Resources Report.

The DEIR's impact analysis for archaeological resources (DEIR, p. IV.B-57–58) is wholly inadequate because it is not based on an archaeological resources report. (SRI Letter, p. 6) Instead, the DEIR's two-paragraph analysis relies on information in the Tribal Cultural Resources Report (the "TCR Report") prepared for the Project, which is limited to analysis of Native American archaeological resources, but includes no data or substantive analysis regarding the protohistoric and historical archaeology of the Project Site. (DEIR, p. IV.B-57–58, Appendix C.2) As stated in the SRI Letter, "[s]tandard practice, *especially in*

an area expected to contain archaeological resources, is to prepare as part of the environmental review process a cultural resources technical report that includes the identification and evaluation of the full range of cultural resources that might be expected in a project area and to use that information to assess project effects on archaeological resources.” (*Id.*, emphasis in original) Rather than prepare a report that considers the full range of archaeological resources present on the Project Site, the DEIR’s archaeological analysis relies on a report that is narrowly focused only on potential tribal cultural resources and omits discussion of expected archaeological resources from the protohistoric and historical periods, provides a cursory evaluation of potential buried resources, and fails to identify specific types of buried cultural resources that have a high likelihood of being present onsite. (*Id.*)

Per the SRI Letter and in accordance with industry standards set forth in *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*, published by the California Office of Historic Preservation in 1990, “[p]roper analysis of Project effects on archaeological resources involves: (1) preparing a historic context for understanding past human land use, as well as the physical remains these uses create, and identifying where those remains would have likely been located; (2) conducting a geoarchaeological study evaluating the possibility that these remains could be preserved despite past environmental and development disturbances; (3) identifying if archaeological remains exist within the Project area and if they are an historical resource as defined by the California Environmental Quality Act (CEQA); and (4) analyzing the effects of the proposed Project on any archaeological historical resources.” (*Id.*, p. 7)

While the DEIR utterly fails to characterize the archaeological potential of the Project Site and vicinity, from the limited information provided in the DEIR, it is apparent from the historic occupation of the Project Site and surrounding areas, including Gilmore Field, Gilmore Stadium, Gilmore Adobe, and smaller properties like the drive-in and gas station known to have been present prior to 1952, that the Project Site may contain intact subsurface deposits of archaeological significance. (DEIR, Appendix C.1, CBS Television City Historic Resources Assessment dated April 11, 2018, prepared by Architectural Resources Group (“ARG”), April 11, 2018, pp. 63–64 [citing Los Angeles Times, “L.A. Scene: The City Then and Now” 1/11/93, which notes that remains of Gilmore Field dugouts were encountered during excavation for the East Studio Building foundation in 1991])³⁷ Accordingly, an archaeological resources report must be prepared consistent with industry standards and as detailed in the SRI Letter, and the DEIR must thereafter be revised to actually and adequately analyze the Project’s potential impacts on archaeological resources. Only then can the public and decisionmakers properly assess whether the proposed Mitigation Measure CUL-MM-1 is appropriate for a site that is rich in archaeological resources.

³⁷ In 2018, when ARG prepared its Historic Resource Assessment for the Project Site, it did not include a comprehensive archaeological assessment in the scope of the report and therefore, the Project Site's potential to yield information important in prehistory or history was deemed unknown at the time. (*Id.*, p. 64)

Response to Comment No. 35-78

Refer to Response to Comments Nos. 13-7, 26-42, and 26-44 regarding the adequacy of the identification and analysis for archaeological resources, including those from all time periods such as the so-called protohistoric period, also known as the Spanish and Mexican Periods. Refer to Response to Comment Nos. 13-7 and 26-42 regarding the considerations of the adequacy of the historical context and land use history, including the uses of Gilmore Adobe and business ventures of the Gilmore family that produced Gilmore Field, Gilmore Stadium, among other commercial developments. These responses also address the means by which geoarchaeological data have been incorporated into the analysis of archaeological resources.

These responses also provide an explanation for why the available evidence presented in multiple data sources, including but not limited to the data presented in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR, contained sufficiently detailed information and substantial evidence to provide a reasonable characterization of the existing conditions and the types of resources most likely to be encountered. Specifically, the proximity of CA-LAN-3045H to the Project Site is noted on page IV.B-58 of Section IV.B, Cultural Resources, of the Draft EIR, which recognizes that there is some potential for unknown historic-period materials in the Project Site, adequately considers the type of archaeological resource most likely to be encountered, and provides a reasonable means of mitigating potentially significant impacts if such a resource is identified.

Additional explanation of how these results further support the analysis presented in Section IV.B, Cultural Resources, of the Draft EIR are described in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo also includes additional clarifications on why the resources described in the Draft EIR as most likely to occur are unlikely to be considered historical resources under CEQA. The Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Refer to Response to Comment No. 26-E.2-11 regarding the applicability of the ARMN standards.

Comment No. 35-79**2. The TCR Report Is Inadequate as an Informational Document.**

Cultural Setting. As detailed in the SRI Letter, the TCR Report is inadequate because it fails to identify the full range of human land-use history of the Project Site and vicinity with respect to archaeological resources. (SRI Letter, p. 7) SRI has identified numerous and significant flaws in the TCR Report's cultural setting section, including "a poor command of local archaeological literature." (*Id.*) The cultural setting for the prehistoric period incorrectly focuses on the San Diego and Mojave Desert regions instead of the relevant Los Angeles Basin. (*Id.*) To the extent it discusses the Los Angeles Basin, it relies on outdated information and omits recent research in downtown Los Angeles and nearby coastal communities. (*Id.*) The section also fails to reference established scholarly studies and contains omissions, incomplete and incorrect information.³⁸ (*Id.*)

In addition, the SRI Letter found that the cultural setting section fails to present historical-period use of the Project Site with respect to archaeological resources, which is critical to anticipating the kinds of potential buried cultural resources onsite. (*Id.*) Neither the DEIR nor the TCR Report analyzes (a) the Project Site and surrounding properties' long history starting in the early Mexican Rancho Period with the founding of Rancho La Brea in 1828, (b) the construction of the Rancho La Brea Adobe (also referred to as Gilmore Adobe) around 1852, (c) development of the local oil industry in the early twentieth century, (d) the development of the early sports entertainment industry, especially Gilmore Field, Gilmore Stadium, and related businesses, or the development of Television City in 1952. (*Id.*) Perhaps most astonishing is the absence of any meaningful discussion of the Rancho La Brea Adobe, located approximately 130 feet south of the Project Site's southern boundary. (*Id.*) The TCR Report does not discuss the history of the adobe and the scope of activities related to the adobe that may include portions of the Project Site. (*Id.*) It even omits any consideration of Native American labor used to construct the original adobe building and Native American domestic help or ranch hands potentially present at the adobe, which was a common occurrence in the 1850s. (*Id.*)

³⁸ For example, the TCR Report fails to mention the early burial at the nearby La Brea Tar Pits, states incorrect dates for the introduction of mortars and pestles, and misstates the burial practices of the Gabrielino tribe. (SRI Letter, p. 7)

Response to Comment No. 35-79

Refer to Response to Comments Nos. 13-7 and 26-42 regarding the adequacy of the Project Site land use history and the entire body of evidence considered in the assessment of archaeological resources, which includes but is not limited to the information presented in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR. This

information has been further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR.

Refer to Response to Comment Nos. 13-7 and 26-42 regarding land use history, methodology used to characterize the existing conditions and cultural setting at the regional and local levels, including the relevance of San Diego area references and how the Los Angeles Basin was adequately considered.

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-13 regarding the references to sources used to inform the analysis, including seminal works by scholars of archaeology, history, and anthropology, as well as studies produced in association with environmental compliance.

Refer to Response to Comment No. 26-E.2-12 regarding the discrepancies in minor details for topics that are either matters of scholarly debate or are only indirectly related to the background setting.

Refer to Response to Comment Nos. 13-7 and 26-42 regarding the subject of the historical context and how the archaeological assessment was informed by the land use history, including considerations of the Mexican Period.

Refer to Response to Comment Nos. 13-7, 26-42, and 26-E.2-12 regarding the discussion of the Gilmore Adobe and various business ventures of the Gilmore family that were pursued in advance of the Project Site being developed as Television City.

Refer to Response to Comment No. 26-E.2-12 regarding the topic of Native American labor.

The above responses explain why the available evidence from multiple data sources and presented in the Draft EIR were sufficiently detailed to provide a reasonable characterization of the existing conditions and the types of resources most likely to be encountered, and thereby provide a reasonable basis on which to develop mitigation measures capable of avoiding or reducing potentially significant impacts.

Comment No. 35-80

Background Research. The SRI Letter also found that the background research section of the TCR Report lacks basic information and is disconnected from the prior cultural setting section for the following reasons: (1) The 0.5-mile radius used for the South Central Coastal Information Center ("SCCIC") records search was wholly inadequate because it failed to consider the archaeological sensitivity of the Project Site, and that a minimum

10-mile radius was required; (2) the TCR Report failed to reference and discuss historic rancho maps, General Land Office (“GLO”) maps, Sanborn Fire Insurance maps, and other historical maps, as well as historical aerial imagery³⁹; and (3) no independent tribal outreach was conducted pursuant to the Sacred Lands Files Search.⁴⁰ (*Id.*, p. 8)

³⁹ Of the few aerial photographs reviewed, the TCR Report did not contextualize any of the structures identified in the images and even failed to identify Gilmore Stadium. (SRI Letter, p. 8)

⁴⁰ The report erroneously relied on the results of the AB 52 consultation. Although the named tribes are the same for the Sacred Lands Files Search and AB 52 consultation, three individuals named by the California Native American Heritage Commission (the “NAHC”) were not named on the AB 52 consultation list. As stated in the SRI Letter, these two forms of Native American engagement serve different purposes, and one should not be substituted for the other. (*Id.*)

Response to Comment No. 35-80

Refer to Response to Comment No. 26-42 regarding the records search radius and why 0.5 mile was sufficient for acquiring the data necessary to substantiate the assessment of archaeological and tribal cultural resources based on the presence of CA-LAN-3045H and the studies completed in association with its recording for a parcel adjacent to the Project Site.

Refer to Response to Comment No. 26-E.2-13 regarding the use of historical maps, including topographic maps, aerials, rancho, GLO, and Sanborn maps. Refer to Response to Comment Nos. 13-7 and 26-42 regarding a more comprehensive discussion of the archival sources used to assess archaeological and tribal cultural resources.

Refer to Response to Comment No. 26-E.2-14 regarding the efforts made to contact tribes identified on the contact list included in the SLF results returned by the NAHC.

Comment No. 35-81

Geoarchaeological Study. The DEIR and TCR Report are devoid of any type of geoarchaeological study analyzing the likelihood of prehistoric or historical-period archaeological resources on the Project Site. (*Id.*, p. 8) The TCR Report fails to analyze the geotechnical investigation findings in a meaningful way to discuss the potential for intact buried archaeological deposits on the Project Site. (*Id.*) As discussed in the SRI Letter, the TCR Report includes just a cursory review of soils data from the geotechnical report and fails to disclose, for example, that “the logs of several borings document dark-gray to black or dark-brown to black sediments present immediately below the fill. Dark sediments can sometimes indicate the presence of anthrosols or other soils with potential for containing cultural resources.” (*Id.*) Furthermore, while the TCR Report recognizes that a drainage crossed the west side of the Project Site prior to modern

development, it surprisingly does not discuss how this drainage may have affected Native American settlement patterns on the Project Site and the surrounding areas. (*Id.*)

In addition, the TCR Report and cultural resources section of the DEIR omit the 1991 discovery of Gilmore Field dugouts during excavation for the East Studio Building foundation. (*Id.*, p. 9) This alone demonstrates the high sensitivity of the Project Site for buried archaeological deposits. (*Id.*)

Response to Comment No. 35-81

Refer to Response to Comment Nos. 26-42 and 26-E.2-15 regarding how geoarchaeological data were already considered in the analysis of the potential for buried archaeological resources.

Refer to Response to Comment Nos. 26-42, 26-E.2-15, and 26-E.2-117 regarding the analysis of specific soils referenced in the geotechnical bore logs.

Refer to Response to Comment No. 26-E.2-15 regarding the discussion of the former stream course identified within the Project Site and the characterization of the environmental setting provided in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Refer to Response to Comment No. 26-E.2-15 regarding the subject of the Gilmore Field dugout.

Elements of the geoarchaeological data have been further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 35-82

Identifying Buried Archaeological Deposits. As discussed in the SRI Letter, in order to properly evaluate buried deposits from development and activities prior to 1952, the preparers of the DEIR should develop a thorough historic context along with in-depth archival research and a geoarchaeological study to identify the types and locations of archaeological resources likely to exist on the Project Site and in the vicinity. (*Id.*) Once identified, these locations should be further analyzed through remote sensing or mechanical excavation, particularly given the recent onsite discovery of remnants of the Gilmore Field dugouts. (*Id.*) As discussed further below, archaeological monitoring during grading, as recommended in Mitigation Measure CUL-MM-1, is appropriate “for identifying and treating **unanticipated** resources but should not be used in lieu of active searching

when there are **anticipated** buried resources to be present.” (*Id.*, emphasis added) Here, it is highly likely that archaeological resources would be encountered during project construction. Given the known archaeological sensitivity demonstrated by recent discovery of archaeological resources onsite and within the Project vicinity, further characterization of potential impacts to archaeological resources and meaningful consideration of appropriate, site-specific mitigation are required here.

Response to Comment No. 35-82

Refer to Response to Comment Nos. 13-7, 26-42, 26-44, and 26-E.2-15 regarding how geoarchaeological data were already considered in the analysis of the potential for buried archaeological resources, including activities prior to 1952 while Gilmore Field was being operated.

Refer to Response to Comment No. 26-42 regarding the reasons why methods such as remote sensing or mechanical excavation are infeasible and unnecessary to support the findings in the Draft EIR, which considers the substantial evidence already presented concerning the likelihood of archaeological resources and the proposed means of mitigating the potential for impacts. This evidence includes building materials identified in geotechnical cores presented in the Preliminary Geotechnical Engineering Investigation in Appendix E.1 of the Draft EIR and reviewed in the Tribal Cultural Resources Report in Appendix C.2 of the Draft EIR.

Refer to Response to Comment No. 26-44 regarding the intended meaning of unanticipated resources and the relationship to the assessment of potential impacts to archaeological sites and how the proposed mitigation avoids or reduces potentially significant impacts.

Further, Response to Comment No. 26-44 specifically addresses how Mitigation Measure CUL-MM-1 is adequate for addressing unanticipated archaeological resources and those likely to be encountered. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities.

Elements of the geoarchaeological data and historical land uses have been further summarized in the Supplemental Cultural Memo, included in Appendix FEIR-14 of this Final EIR. The Supplemental Cultural Memo did not identify any new or substantially more significant impacts than were disclosed in the Draft EIR.

Comment No. 35-83**3. Mitigation Measure CUL-MM-1 Improperly Defers Identification and Evaluation of Subsurface Archaeological Resources.**

Even if the DEIR had adequately characterized the archaeological potential of the Project Site and surrounding areas (which it does not), Mitigation Measure CUL-MM-1 is entirely inappropriate even based on the limited archaeological information made available to the public. To start with, CUL-MM-1 incorrectly defers identification and evaluation of subsurface archaeological resources to construction monitoring rather than proactively identifying archaeological resources during the environmental review process. (SRI Letter, pp. 6–7) Moreover, when dealing with an archaeologically sensitive site, as we have here, a mitigation measure that is limited to the inadvertent discovery of archaeological resources like the one proposed in CUL-MM-1, where a monitor is simply present to address unknown discoveries on an emergency basis, is wholly inappropriate. (*Id.*) In fact, the failure to adequately identify archaeological resources prior to the commencement of construction increases the likelihood that the Project would have a significant effect on encountered archaeological resources. (*Id.*)

The DEIR states that “[t]he Project Site has been previously disturbed and developed.... Given that the Project would include excavations to a maximum depth of approximately 45 feet below ground surface, there may be a potential to encounter **unknown** archaeological resources that could be present at the Project Site.” (DEIR, p. IV.B-58, emphasis added) The DEIR does not describe the scope of prior excavation and grading activity on the Project Site, so the location, depth and extent of intact subsurface soil is unknown. However, with the preparation of a proper and complete archaeological resources report, as described by SRI, the preparers of the DEIR could consider and recommend appropriate mitigation that does more than address inadvertent discovery, but also presents a detailed and supported mitigation plan based on the **known** archaeological resources likely to be present onsite.

Response to Comment No. 35-83

Refer to Response to Comment Nos. 13-7, 26-42, and 26-44 on the efforts made to obtain substantial evidence used to assess the potential for archaeological and tribal cultural resources within the Project Site and put forward mitigation measures capable of avoiding or reducing potentially significant impacts to less than significant levels. Further, Response to Comment No. 26-44 specifically addresses how Mitigation Measure CUL-MM-1 is adequate for addressing unanticipated archaeological resources and those likely to be encountered. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities. The Supplemental Cultural Memo,

included in Appendix FEIR-14 of this Final EIR, also provides additional discussion and expert opinion related to these responses.

Comment No. 35-84

H. The DEIR's Analysis of the Project's Energy Impacts Is Inadequate.

1. The Assumptions Used in the Underlying Modeling Are Inaccurate and Distort the Energy Analysis.

The VMT Calculator in the Transportation Assessment for the Project (see DEIR, Appendix M.1) and the CalEEMod from the Greenhouse Gas Emissions (“GHG”) worksheets in Appendix B-3 (“CalEEMod for GHG”) provide the backbone of the energy analysis. For both construction and operation, the consumption estimates for transportation⁴¹, electricity, and natural gas⁴² all start with outputs from CalEEMod for GHG or the VMT Calculator as the basis for the ultimate energy consumption estimates provided in the analysis and in Appendix D, Energy Calculations (“Energy Calculations”). (DEIR, pp. IV.C-19–20, IV.C-24, IV.C-26 [Table IV.C-1 and Table IV.C-2]) As discussed below, the analysis falls victim to the same errors seen in the air quality and transportation analyses. See also Sections II.E and II.Q, *infra*, for additional discussion regarding the flawed modeling.

To begin with, while the DEIR's project description states that the Specific Plan will include numerous uses, the VMT Calculator and CalEEMod for GHG only model a subset of uses associated with the DEIR Conceptual Plan and DEIR Conceptual Program, which is merely one illustrative scenario among endless options. The VMT Calculator and CalEEMod for GHG only includes sound stages, production support, production office, general office and retail uses, notwithstanding that the Specific Plan would allow myriad other use, many of which would presumably involve greater energy use per square foot. In other words, the scale and intensity of development ultimately approved at the Project Site may differ substantially from, and be substantially greater than, what was analyzed in Section IV.C (Energy) of the DEIR. Accordingly, the nebulous project description makes it impossible to properly evaluate the Project's actual energy demands with respect to transportation energy, electricity or natural gas.

Furthermore, the DEIR's discussion of how the permitted land use exchange among the five uses in the DEIR Conceptual Program would affect the Project's energy demand is incomprehensible. As stated in Note bin Table IV.C-2, “[t]he proposed Specific Plan would provide development flexibility by allowing for exchanges between certain categories or permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry.” (*Id.*, p. IV.C-27) Note b claims that certain land use exchanges would represent the “maximum” demand for electricity, natural gas and transportation fuel, but provides no explanation to support those claims. Furthermore, Table IV.C-2 reflects that the electrical demand would be exactly the same for the DEIR

Conceptual Program or a “maximum demand scenario” with what it claims would be the most impactful land use exchange. (*Id.*) How can that be? Perhaps relatedly, Note b states that with the implementation of unspecified project design features, the DEIR Conceptual Program would generate the maximum electricity demand, but provides no support for that claim either. (*Id.*) Is this meant to explain why the electricity demand is claimed to be the same under any scenario? It is impossible to tell. Table IV.C-2 is a jumble of confusion.

- ⁴¹ To assess construction impacts related to transportation energy (gasoline and diesel fuel), the analysis starts with the outputs from the vendor trips and heavy-duty equipment inputted into CalEEMod for GHG. (*Id.*, pp. IV.C-19–20) These outputs are then calculated by either (1) multiplying fuel usage estimates per horsepower for heavy-duty equipment or (2) dividing the County-specific miles per gallon factor using CARB’s EMFAC 2021 model for vendor trips. (*Id.*) To assess operational impacts related to transportation, the analysis starts with the daily Project-related VMT from the VMT Calculator, which were then inputted in the CalEEMod for GHG to obtain the annual VMT for the Project. (*Id.*) The gasoline and diesel fuel usage were calculated using EMFAC 2021 based on an estimated vehicle fleet mix for Los Angeles County. (*Id.*)
- ⁴² Electricity and natural gas consumption estimates provided in the DEIR rely exclusively on the outputs from the CalEEMod for GHG for both construction and operations. (*Id.*)

Response to Comment No. 35-84

The Project’s energy impacts were comprehensively analyzed in Section IV.C, Energy, of the Draft EIR in accordance with CEQA based on conservative assumptions and substantial evidence, and impacts were determined to be less than significant.

Please refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for a detailed explanation of how the Project Description is accurate, stable, and finite and complies with CEQA and the regulatory process under the proposed Specific Plan. As noted therein, the scale and intensity of the Project would not exceed the parameters disclosed in the Draft EIR and further clarified in this Final EIR. Please also refer to Response to Comment Nos. 26-E.1-27, 26-E.1-28, and 35-53 for a discussion on the CalEEMod land use modeling and how the Draft EIR analyzed the potential physical environmental impacts of all proposed uses, areas and activities. As discussed extensively in Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 26-35, the energy analysis accounted for the impacts of all proposed uses, areas and activities, regardless of the proposed Specific Plan definition of floor area.

Please see Topical Response No. 3, Permitted On-Site Uses, for a detailed explanation of the five studio land uses (i.e., sound stage, production support, production office, general office, and retail) permitted for the Project. Response to Comment No. 26-E.1-27 explains how the Draft EIR analysis comprehensively accounts for the Land Use Exchange Program under the proposed Specific Plan.

This comment references Sections II.E and II.Q of this comment letter. For Section II.E responses, please refer to Response to Comment Nos. 35-43 through 35-69. For Section II.Q responses, please refer to Response to Comment Nos. 35-12 through 35-150.

Supporting calculations are provided on pdf page 10 of Appendix D, Energy Calculations, of the Draft EIR which provides the demand factors used, reduction in electricity/natural gas associated with PDFs, and resulting electricity/natural gas usage. PDFs incorporated into the calculation of electricity/natural gas usage were described on page IV.C-21 in Section IV.C, Energy, of the Draft EIR. As described therein, Project Design Feature GHG-PDF-2 would require photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kWh annually. In addition, Project Design Feature GHG-PDF-1 would result in an approximately 25-percent reduction with the installation of high-efficiency lighting (see page IV.C-26 in Section IV.C, Energy, of the Draft EIR). The “maximum demand scenario” accounted for an increase in square footage of land uses with higher demand factors (e.g., kilowatts per square foot per year). In addition, the VMT for the “maximum demand scenario” is from the LADOT VMT output included in pdf pages 758 through 782 of Appendix M, Transportation, of the Draft EIR. Table IV.C-2 (Summary of Net Annual Energy Use During Project Operation) provided in Section IV.C, Energy, of the Draft EIR provides a summary of the energy usage associated with the “maximum demand scenario.” As discussed in Footnote b of Table IV.C-2, without the implementation of PDFs, the land use mix that would generate the maximum electricity demand reflects an exchange of a combined total reduction of 446,000 square feet of production office and/or general office space for an additional 100,000 square feet of sound stages and an additional 346,000 square feet of production support uses since production support and sound stages have a higher electricity usage factor than office. However, with the implementation of the PDFs, the proposed development program would generate the maximum electricity demand.

Refer to pdf page 4 of Appendix D, Energy Calculations, in the Draft EIR. Also, refer to pdf pages 345 and 346 and pdf pages 363 and 364 of Appendix B of the Draft EIR for the electricity usage output (CalEEMod output file) for the Project and the maximum demand scenario, respectively. CalEEMod 2020.4.0 provides energy use factors for three sources (Title 24, Non-Title 24, and Lighting). Project Design Feature GHG-PDF-1 (25-percent reduction with the installation of high efficiency lighting) only applies to lighting energy usage. So, while sound stages and production support have a higher total electricity usage factor, the office lighting usage factor is lower. Thus, application of the 25-percent reduction for high efficiency lighting does not reduce the overall energy usage for office space as much as for sound stages and production support.

Under the maximum natural gas and maximum fuel demand scenario, a reduction of 100,000 square feet of production support would be exchanged for 100,000 additional square feet of sound stages since sound stages have a higher natural gas usage factor

than production support. Under each of these development scenarios, all impacts would remain less than significant. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Appendix FEIR-3 of this Final EIR regarding the Land Use Exchange Program and maximum impact scenarios.

Comment No. 35-85

In addition, the energy modeling and analysis does not even address all of the areas and uses that are contemplated as part of the DEIR Conceptual Plan and DEIR Conceptual Program. Specifically, all energy-intensive uses within the two production levels, which apparently include multiple basecamp and other production-related areas, as well as the Mobility Hub, were excluded from CalEEMod and the VMT Calculator. As such, the energy calculations and related analysis understate the Project's actual energy demands from transportation energy, electricity and natural gas, even when such analysis is arbitrarily confined to the DEIR Conceptual Plan and DEIR Conceptual Program.

The energy analysis should be redone to analyze the Project's actual worst-case energy impact.

Response to Comment No. 35-85

Please refer to Response to Comment No. 35-53 regarding electricity demand associated with the basecamp areas, Mobility Hub, and production-related areas. Refer to Response to Comment No. 26-174 regarding the natural gas usage evaluated in the Draft EIR.

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and to Response to Comment Nos. 5-7 and 26-121 for a discussion of how all of the uses, areas and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area and how no active production activities would be located in the parking and basecamp areas below Project Grade.

Please also refer to Response to Comment No. 26-51 regarding the updates to the Project energy analyses modeling to account for building electrification related to the City's new all-electric buildings ordinance.

The Draft EIR comprehensively analyzed the energy impacts from the proposed development program (Conceptual Site Plan) as well as the maximum energy impact scenarios under the Land Use Exchange Program in Section IV.C, Energy, of the Draft EIR, and correctly determined that impacts would be less than significant. Refer to Response to Comment No. 35-84 regarding the maximum energy impact scenario analysis.

Comment No. 35-86**2. The Actual Energy Demand Required by Diesel Generators During Operations Is Not Disclosed in the DEIR.**

The DEIR provides limited information regarding the diesel generators that would be used at the Project Site, so it is impossible to know whether the full scope of the Project's energy impact is disclosed. It appears that the DEIR's energy section does not disclose the energy consumption from diesel generators required for basecamp and other production support operations on the two production levels. That is because the analysis only discusses emergency generators at the Project Site. It states that six "emergency" generators are currently used on the Project Site, and the Project would increase the amount of diesel fuel used by generators by an additional 4,594 gallons per year (or three additional generators). (DEIR, pp. IV.C-17 and IV.C-27 [Table IV.C-2]) Section IV.C (Energy) of the DEIR also states that the emergency generators would only "be used on an intermittent, short-term basis" and during periodic testing. (*Id.*, p. IV.C-29)

This assumption does not square with other facts provided in the DEIR. Specifically, the project description discloses that generators would be used during regular basecamp operations, stating that basecamp areas include "mobile facilities such as trucks, **generators**, and support vehicles related to production are temporarily staged" and "passive uses (including, but not limited to, parking, storage of mobile facilities, **power generators**, support vehicles, etc.)." (*Id.*, p. II-7, emphasis added) This reflects full-time, constant use of generators. Furthermore, Section IV.F (Hazards and Hazardous Materials) of the DEIR discloses that belly tanks and ASTs for diesel fuel would be kept onsite, which further suggests that generators would be used more frequently than on a short-term, intermittent basis. If generators will be used for regular basecamp operations, then should not the stated assumptions in the DEIR reflect that anticipated use?

Response to Comment No. 35-86

Refer to Response to Comment No. 26-36 regarding basecamp power usage. While existing production activities occasionally require the use of small portable generators when electrical hookups are not available, the Project would provide a sufficient number of electrical hookups in basecamp areas such that use of portable generators would not be necessary. Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of additional electrical hookups at all basecamp areas. During operation of the Project, emergency generators would be included for emergency use during a power outage and regularly tested for maintenance purposes but otherwise would not be used to provide power to the Project Site. As under the existing condition, diesel storage tanks are provided for the emergency generators for purposes of supplying diesel fuel to the emergency generators during a loss of power. Therefore, there would be no diesel fuel use

regularly associated with the emergency generators. The intermittent nature of generator use proposed by the Project is consistent with the Draft EIR's analysis and conclusions.

Comment No. 35-87

3. The Energy Analysis Does Not Address a Potentially Significant Impact Related to GHG-PDF-2.

The Project Site currently has a significant number of photovoltaic panels ("PV Panels") (1,617,000 kWh annually). Project Design Feature GHG-PDF-2 mandates the installation of additional PV Panels on the Project Site, which are capable of generating a minimum of 2,000,000 kWh annually, a 383,000 kWh increase from the existing condition. However, the construction schedule and project description do not address what Hackman would do with the existing PV Panels that are currently spread across a substantial portion of the Project Site. (DEIR, p. IV.C-27 [Table IV.C-2]) Presumably, however, they would be removed, which would result in the loss of an energy-producing use that has not been accounted for in the DEIR's energy analysis.

Furthermore, the DEIR does not address the indirect or secondary environmental impact that could occur with the implementation of GHG-PDF-2, as required by Section 15126.4(a)(1)(D) of the Guidelines. For example, the removal of the existing PV Panels could add additional haul trips and vendor trips that were unaccounted for in the diesel and gasoline estimates for the energy analysis or in the DEIR's air quality analyses.

Response to Comment No. 35-87

The Draft EIR energy analysis takes into account the existing solar generation at the Project Site. As presented in Table IV.C-2 of the Draft EIR, solar generation (i.e., Project Design Feature GHG-PDF-2) would result in an approximately 383,000-kWh increase in production relative to existing conditions. Only the increase in solar production relative to the existing conditions was accounted for in the analysis of net energy demand. Energy demand associated with vehicle trips needed for the removal or installation of solar panels were assumed in the hauling and vendor delivery trips estimated for Project construction. Please refer to pdf page 8 of Appendix D, Energy Calculations, of the Draft EIR.

Comment No. 35-88

4. The Transportation Energy Demand Does Not Accurately Account for Diesel Fuel Usage from Trucks During Operations.

As stated previously, to calculate the diesel fuel estimates for Project operations, the DEIR used the daily project-related VMT from the VMT Calculator, which was then inputted into the CalEEMod for GHG to determine the estimated annual VMT for the Project. The

annual VMT was then divided by the “County-specific [miles per gallon] calculated in EMFAC2021” based on the default CalEEMod vehicle fleet mix for projects in Los Angeles County. (DEIR, p. IV.C-20) However, the DEIR provides no evidence to justify the use of the default CalEEMod fleet mix for the Project. Given the large number of diesel-fueled trucks that would arrive at and depart from the Project Site each day (estimated at 559 one-way trips or 279 round trips per day), the DEIR needs to explain why the default fleet mix is appropriate and, if it is not appropriate, to modify the default and redo the analysis. (Air Quality Report, pp. 102, 103)

Moreover, the land use assumptions in the VMT Calculator are inconsistent with the land uses in the CalEEMod for GHG sheets. Specifically, the VMT Calculator does not assume any industrial uses at the Project Site, but the CalEEMod for GHG assumed 454,000 square feet of industrial uses. (DEIR, Appendix M.1, pp. 351–361; Air Quality Report, CalEEMod for GHG, p. 341) So, it is not clear whether operational diesel-fuel truck trips were accurately included in the Energy Calculations for the Project. The energy analysis should be updated to address the inconsistency between the CalEEMod for GHG and VMT Calculator and to clarify how diesel-fueled trucks were accounted for in the energy calculations.

Response to Comment No. 35-88

Refer to Response to Comment No. 26-E.1-22 for a discussion of the Project trip generation rates. Please refer to Response to Comment No. 26-E.1-16 for a discussion of diesel truck trip estimates associated with Project operations. As discussed therein, the commenter’s estimate of operational trucks is not accurate as the Project would result in approximately 62 diesel truck trips per day. CalEEMod provides the fleet mix calculated using EMFAC based on the selected county. Specifically, EMFAC calculates the fleet mix by vehicle type based on the total trips and vehicle population data for the designated county. Thus, for Los Angeles County, CalEEMod would use the same default fleet mix for all land uses within the county regardless of land use type (i.e., CalEEMod uses the same fleet mix whether the user selects an industrial park, retail, or dwelling units). This comment does not provide substantial evidence to support changing the default CalEEMod fleet mix for the Project. Furthermore, the same number of trips and VMT analyzed in CalEEMod for GHG are consistent with the trips and VMT calculated by the VMT Calculator. Refer to Appendix M, Transportation, of the Draft EIR beginning on pdf page 242 for the VMT Calculator output files. This comment does not provide substantial evidence of inconsistency between the trips and VMT provided in CalEEMod for GHG and the VMT calculated by the VMT Calculator.

Comment No. 35-89

I. The DEIR's Analysis of the Project's Geology and Soils Impacts Is Inadequate.

The DEIR's analysis of the Project's impacts on geology and soils is inadequate for the reasons set forth below.

1. The Geotechnical Report Relies on Unstable Project Assumptions.

The DEIR's analysis of the Project's geology and soils impacts is based in large part on the Preliminary Geotechnical Engineering Investigation ("Geotechnical Investigation"), Addendum I—Response to Soils Report Review Letter ("Geotechnical Addendum I"), and Addendum II—Additional Geotechnical Comments ("Geotechnical Addendum II") (collectively the "Geotech Report"). (DEIR, p. IV.D-1, Appendix E)

The Geotech Report, in turn, bases its analysis on the DEIR Conceptual Plan (*id.*, Appendix E, p. 72 of PDF) and the following assumptions:

- "For reference purposes, an elevation of 185 feet above mean sea level (AMSL) will be utilized as the base site elevation.
- The proposed sound stages will be one-story high-bay structure, extending approximately 60 feet in height.
- The proposed production support buildings and office buildings will vary typically between 4 and 7 stories in height.
- The proposed parking structure will be approximately 9 stories in height. In addition parking may also be provided in subterranean areas.
- Multi-story buildings for production and general office may be spread across the Project site." (*Id.*, Appendix E, Geotechnical Investigation, p. 2)

It also assumes that "[m]ost of the sound stages, production support, and office buildings will be constructed at or near the base site elevation for the Project. The structures closest to Beverly Boulevard will be constructed over 2 subterranean levels. It is anticipated that the subterranean levels will extend approximately 20 to 40 feet below the existing Project [S]ite grade." (*Id.*) It further assumes that "[p]reliminarily, the office buildings, production support buildings, and parking structure will have estimated column loads between 1,500 and 2,000 kips. The sound stages will have estimated typical column loads of 500 kips. Grading will consist of excavations for removal and recompaction of existing unsuitable soils, and excavations for the proposed subterranean levels and foundation elements." (*Id.*)

The Geotech Investigation cautions, however, that “[a]ny changes in the design of the Project or location of any structure, as outlined in this report, should be reviewed by [Geotechnologies, Inc.]” and states that, “[t]he recommendations contained in [the Geotech Report] should not be considered valid until reviewed and modified or reaffirmed, in writing, subsequent to such review.” (*Id.*) In other words, the Geotech Report expressly states that it is not valid for any development scenario other than the DEIR Conceptual Plan. But Hackman is not required to develop the Project in accordance with the DEIR Conceptual Plan. As discussed throughout this letter, Hackman could develop the Project in a much different way with different buildings and uses at different locations. As just one example, the production support buildings and office buildings shown on the DEIR Conceptual Plan within Height District D can have a minimum height limit of 88 feet and maximum height of 225 feet over 40% of the height zone. (*Id.*) This would allow buildings at least three times the height with the four- to seven-story buildings assumed in the Geotech Report. As such, the analysis in the Geotech Report, and therefore the analysis in the DEIR, is invalid because they are based on an inherently unstable project description and unwarranted and improper assumptions.

Response to Comment No. 35-89

The qualifying statement in the Preliminary Geotechnical Engineering Investigation included as Appendix E.1 of the Draft EIR is found in any such report, and simply means that any changes to the design or locations of structures must be reviewed by the geotechnical engineer of record so that any adjustments or modifications to the geotechnical design parameters may be made, if necessary, to ensure that the building design are in conformance with the recommendations provided in Appendix E.1 and in compliance with applicable building code requirements. All design recommendations and parameters will be reviewed by the local jurisdiction as part of the regulatory permitting process prior to construction. Furthermore, permitted development would adhere to the parameters set forth in Section II, Project Description of the Draft EIR and in the Preliminary Draft Specific Plan. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the accurate, stable, and finite Project Description and the regulatory process under the proposed Specific Plan. As discussed therein, any substantial changes from the Project would require future discretionary City review and approval and additional CEQA review. The maximum depth of excavation would be approximately 45 feet and the maximum export would be approximately 772,000 cubic yards. Should additional depth of excavation or additional export be required, further CEQA review would also be required.

Comment No. 35-90**J. The DEIR's Analysis of the Project's Paleontological Resources Impacts Is Inadequate.**

The DEIR's paleontological resources analysis is inadequate primarily because it fails to clearly characterize the paleontological potential of the Project Site due to its cursory and sometimes contradictory analysis. As a result, the DEIR's recommended Mitigation Measure GEO-MM-1 is unsupported by substantial evidence and further consideration of appropriate mitigation is required, especially given the known extent of paleontological resources present in the project vicinity.

1. The DEIR Fails to Clearly Characterize the Paleontological Potential of the Project Site.

The DEIR's impact analysis for paleontological resources consists of one paragraph (DEIR, p. IV.D-26) and relies on a records search conducted by the Natural History Museum of Los Angeles ("LACM") Vertebrate Paleontology Department that yielded no previously encountered vertebrate fossil localities onsite and a 31-page Paleontological Resources Review Memorandum prepared by Dudek (the "Paleo Report"), less than two pages of which included any substantive analysis of paleontological resources and the remainder comprised of a brief project description and 27 pages of Dudek's qualifications. (DEIR, Appendix F)

As discussed in the SRI Letter, the DEIR fails to discuss the specific depths at which native sediments occur beneath the Project Site and the nature of the underlying geology, particularly as such information relates to paleontological potential onsite. (SRI Letter, p. 10) In addition, the DEIR refers to a variety of geologic unit terminology interchangeably to describe the sediments underlying the Project Site, when such terms have specific meanings and are not necessarily interchangeable. (*Id.*) As a result, it is impossible to understand the character of the underlying geology of the Project Site, yet alone the depths and location of each geologic unit anticipated to be encountered during Project construction. (*Id.*)

Moreover, the DEIR uses outdated 1995 definitions, rather than more current 2010 definitions, for significant fossiliferous deposits and significant paleontological resources provided by the Society of Vertebrate Paleontology ("SVP"). As discussed in the SRI Letter, it is not clear whether the Paleo Report used the SVP system for assigning paleontological resource potential, but the DEIR seemingly implies that the SVP system was used. (*Id.*) However, to add to the already confusing analysis, the DEIR states that the Project Site has a "moderate to high" paleontological sensitivity (DEIR, p. IV.D-15), which is not a listed designation within the SVP system. (SRI Letter, p. 10)

Response to Comment No. 35-90

The potential impacts to paleontological resources were comprehensively evaluated in Section IV.D, Geology and Soils, of the Draft EIR and the Paleontological Resources Review Memorandum included as Appendix F of the Draft EIR, which was prepared in accordance with CEQA and 2010 SVP standards. As discussed on pages IV.D-15 to IV.D-16 of the Draft EIR, a paleontological records search specific to the Project Site was conducted through the Natural History Museum of Los Angeles. Regarding the analysis presented in the Paleontological Resources Review Memorandum, Dudek prepared the memorandum for the Project based on the results of the confidential records search, which contains sensitive fossil locality data that are on file at the City for review by qualified individuals, as stated on page IV.D-15 of Section IV.D, Geology and Soils, of the Draft EIR.¹³⁷ The results of the paleontological records search indicated that there are no previously encountered vertebrate fossil localities located within the Project Site. However, fossil localities have been identified within 4,000 feet of the Project Site from the same sedimentary deposits that occur beneath portions of the Project Site. The Project Site is mapped as being underlain by older Quaternary alluvial deposits that are late Pleistocene in age (approximately 129,000 to 11,700 years old). These Pleistocene age alluvial deposits have a high potential to yield paleontological resources. Thus, these sedimentary deposits have the potential to yield scientifically significant vertebrate fossils.

As the paleontological records search indicated that there are no previously encountered vertebrate fossil localities located within the Project Site, the Draft EIR and Paleontological Resources Review Memorandum evaluated the known presence of paleontological resources at nearby properties. The Draft EIR identified seven nearby properties where paleontological resources were discovered. For each such property, the Draft EIR identified the distance from the property to the Project Site, the type of resources found, the depth below grade the resource was found, and the type of sedimentary deposit in which the resource was found as discussed on pages IV.D-15 to IV.D-16 of Section IV.D, Geology and Soils.¹³⁸ Those resources were generally found in older Quaternary age deposits. Similarly, Pleistocene age alluvial deposits were found to be present below the artificial fill at the Project Site (as confirmed by the Preliminary Geotechnical Engineering

¹³⁷ Records searches for paleontological resources such as sensitive fossil data are kept confidential to protect the specific locality information in order to, among other reasons, prevent poaching. However, general information about the type of geological units is not considered confidential.

¹³⁸ The discoveries discussed in Section IV.D, Geology and Soil, of the Draft EIR and the Paleontology Technical Report included nearby development projects such as The Grove at Farmers Market as well as the La Brea Tar Pits within Hancock Park. Given the fact that the La Brea Tar Pits is a National Natural Landmark, further descriptions of its importance would be redundant. It is mentioned in the same paragraph (on page 2 of the Paleontological Resources Review Memorandum) that “millions of Pleistocene fossil plant, insect, and animal specimens” have been recovered from the La Brea Tar Pits, further emphasizing its importance.

Investigation attached as Appendix E.1 of the Draft EIR). Although no previously encountered vertebrate fossil localities were identified within the Project Site as part of the records search, previously undisturbed Pleistocene age alluvial deposits would be conducive to preserving such remains. As excavation for the Project would occur up to a maximum depth of approximately 45 feet below grade, it was determined that it is possible that fossilized remains may be encountered during grading operations within the Project Site. As resources were found at some of the nearby sites at depths of 45 feet or less, the Draft EIR concluded that paleontological resources could be discovered at the Project Site during excavation. Refer to pages IV.D-15 to IV.D-16 and IV.D-26 to IV.D-27 of the Draft EIR and Appendix F (Paleontological Resources Review Memorandum) of the Draft EIR.

Regarding the depth of native sediments, the Draft EIR and Paleontological Resources Review Memorandum conservatively assumed that the Pleistocene age alluvial deposits could exist immediately below the artificial fill at the Project Site, and thus, would require monitoring for paleontological resources except during excavation of the artificial fill (refer to Appendix F, page 2, of the Draft EIR). Also, the Preliminary Geotechnical Engineering Investigation identified the Pleistocene age alluvial deposits as shallow as three feet below grade (refer to Appendix E.1, page 4, of the Draft EIR).¹³⁹

In addition, as discussed on pages IV.D-15 to IV.D-16 of Section IV.D, Geology and Soils, of the Draft EIR, the Paleontological Resources Review Memorandum uses the correct terminology when discussing the type of deposits that have a higher potential to contain paleontological resources, namely, older Quaternary age sedimentary deposits known as Pleistocene. As discussed on pages 1–2 of the Paleontological Resources Review Memorandum, “[t]he Project Site is mapped as being underlain by older, elevated Quaternary alluvial deposits that are late Pleistocene in age (approximately 129,000 to 11,700 years old; map unit Qae)” based on published geological mapping.^{140,141} Previously discovered fossils in the area have been in older Quaternary age sedimentary deposits known as Pleistocene age deposits.

With respect to the Society for Vertebrate Paleontology Standard Guidelines (SVP Guidelines), which were published in 1995 and updated in 2010, those Guidelines are

¹³⁹ The Draft EIR discusses the existing soil conditions on page IV.D-11 of Section IV.D, Geology and Soils, detailing fill deposit thickness, depth, and native deposits that lie underneath. Boring logs are provided as part of the Preliminary Geotechnical Engineering Investigation in Appendix E.1 of the Draft EIR.

¹⁴⁰ Dibblee, T.W. and H.E. Ehrenspeck. 1991. Geologic map of the Hollywood and Burbank (south 1/2) quadrangles, Los Angeles, California, Dibblee Geological Foundation, Dibblee Foundation Map DF-30, 1:24,000.

¹⁴¹ Cohen, K.M., S.C. Finney, P.L. Gibbard, and J.-X. Fan. 2023. The ICS International Chronostratigraphic Chart.” Episodes 36: 199–204. 2013.

discussed on pages IV.D-3 to IV.D-4 of Section IV.D, Geology and Soils, of the Draft EIR and in the Paleontological Resources Review Memorandum. The Paleontological Resources Review Memorandum refers to the 2010 SVP Guidelines, and the Draft EIR refers to both the 1995 and 2010 SVP Guidelines, as discussed on pages IV.D-3 through IV.D-4, footnotes 5 through 8 in Section IV.D, Geology and Soils, of the Draft EIR. Those citations to the 1995 SVP Guidelines refer to the definitions of “significant nonrenewable paleontological resources” and “significant fossiliferous deposits.” The definitions of those terms in the 1995 and 2010 SVP Guidelines are not substantively different (i.e., they were not substantively changed in the 2010 SVP Guidelines).¹⁴² The Draft EIR states that:

As defined by the SVP [1995], significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.

The Draft EIR goes on to state:

As defined by the SVP, significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

The SVP (2010) states that:

¹⁴² Notably, these definitions from the 1995 SVP Guidelines have been referenced as recently as 2019 by other consultants. See page 6 of www.cityofinglewood.org/DocumentCenter/View/13919/I-Paleontological-Resources-Report.

Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

This updated definition incorporates elements of both of the SVP (1995) definitions, specifically, what fossils and fossiliferous deposits are, data such deposits yield, and ages of such deposits. The definition of “significant paleontological resources” in the first sentence of the 2010 definition incorporates the elements stated in the: (i) first two sentences of the 1995 definition of “significant nonrenewable paleontological resources” and (ii) first sentence of the 1995 definition of “significant fossiliferous deposits.” Further, the last sentence of the 2010 definition of paleontological resources refers to the same time period as referenced in the last sentence of the 1995 definition of significant fossiliferous deposits.

For the sake of clarity, however, pages IV.D-3 and IV.D-4 of the Draft EIR were revised to reflect only the 2010 SVP Guidelines; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. This revision does not affect or change the analysis or conclusion in the Draft EIR related to potential impacts on paleontological resources.

Finally, regarding the use of the terminology of “moderate to high” potential or sensitivity for paleontological resources, the moderate to high potential or sensitivity is used by practitioners to indicate the need for paleontological resources mitigation during construction.¹⁴³ Low or zero (also “no”) potential or sensitivity indicate that mitigation is not needed during construction. Thus, using only the terminology of “high” sensitivity instead of the terminology of “moderate to high” sensitivity would not change the conclusion in the Draft EIR that mitigation is required (through monitoring for paleontological resources).

Comment No. 35-91

2. Mitigation Measure GEO-MM-1 Is Inadequate.

Even if the DEIR had adequately characterized the paleontological potential of the Project Site and surrounding areas (which it does not), Mitigation Measure GEO-MM-1 is

¹⁴³ County of San Diego, El Monte Sand Mining Project Draft EIR, Section 2.5, Paleontological Resources, August 2018.

inadequate even based on the limited and conflicting paleontological information in the DEIR. First, Mitigation Measure GEO-MM-1, which requires construction monitoring by a paleontologist, fails to provide all requisite qualifications under the SVP system for a project paleontologist and omits any qualifications for the paleontological monitor. (SRI Letter, p. 11) Given the “moderate to high” paleontological sensitivity of the geologic units underlying the Project Site and the Project’s proximity to “La Brea”-type asphaltic deposits, an experienced professional monitor should be required under Mitigation Measure GEO-MM-1. (*Id.*)

Second, as discussed in the SRI Letter, Mitigation Measure GEO-MM-1 lacks other critical provisions included in paleontological mitigation measures for recent projects near the Project Site and within the same geologic unit, “including requirements for fossil preparation, assignment of an approved repository, donation of significant paleontological resources to the approved repository, review of the Mitigation and Treatment Plan by curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and at the Natural History Museum La Brea Tar Pits & Museum, mandate of a Worker Environmental Awareness Program (WEAP), authority of the paleontological monitor to divert/direct ground-disturbing activities in the event of discovery, and preparation of a final report at the conclusion of monitoring.” (*Id.*) Accordingly, in addition to revising the DEIR’s analysis of the Project Site’s paleontological potential, the preparers of the DEIR must meaningfully consider mitigation to address the known paleontological resources within the Project Site, not just the unknown paleontological resources that could inadvertently be discovered there.

Response to Comment No. 35-91

Mitigation Measure GEO-MM-1, as provided on page IV.D-27 of the Draft EIR, requires the preparation of a Paleontological Resource Mitigation and Treatment Plan by a “paleontologist who meets the Society of Vertebrate Paleontology standards (including a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals, with demonstrated competence in the paleontology of California or related topical or geographic areas, and at least two full years of experience as assistant to a Project paleontologist).” Definitions for a qualified professional paleontologist and qualified paleontological resource monitor are outlined in the 2010 SVP Guidelines (which is discussed in Section IV.D, Geology and Soils, of the Draft EIR and the Paleontological Resources Review Memorandum (Appendix F of the Draft EIR). This measure also provides that “[t]his Project paleontologist shall supervise a paleontological monitor who shall monitor all ground disturbance activities within Pleistocene age deposits in order to identify potential paleontological remains.” Further, as stated on page IV.D-28 of the Draft EIR, the paleontological monitoring program required by Mitigation Measure GEO-MM-1 would follow the SVP Guidelines.

Mitigation Measure GEO-MM-1 is consistent with the 2010 SVP Guidelines and professional best practices for paleontology. As stated above, the paleontological monitoring would follow the SVP Guidelines. Nevertheless, Mitigation Measure GEO-MM-1 has been clarified to expressly incorporate the qualification requirements for both a Qualified Professional Paleontologist and Qualified Paleontological Resource Monitor as defined by the 2010 SVP Guidelines. In addition, although standard for Paleontological Resource Mitigation and Treatment Plans, which will be prepared pursuant to Mitigation Measure GEO-MM-1, this mitigation measure has been further revised to expressly include: (a) a Worker Environmental Awareness Program; (b) communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens; (c) the authority of the monitor to stop construction work if resources are discovered; (d) review of the Paleontological Resource Mitigation and Treatment Plan by the curatorial staff of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County and/or the La Brea Tar Pits and Museum; and (e) the preparation of a post-monitoring report. Thus, Mitigation Measure GEO-MM-1 has been revised as set forth in Section III, Revisions, Clarifications, and Corrections to the Draft EIR:

In addition, the Paleontological Resource Mitigation and Treatment Plan, according to the mitigation measure, “shall specify ... laboratory procedures,” which would generally include preparation of paleontological resources to the point of taxonomic identification. It should also include, but not be limited to, “curation provisions” which outline the museum, for instance, that will serve as the accredited repository of discovered paleontological resources. The Paleontological Resource Mitigation and Treatment Plan shall also include the details for the Worker Environmental Awareness Program (WEAP) which is now an express requirement in the clarified version of Mitigation Measure GEO-MM-1.

Further, other elements of the Paleontological Resource Mitigation and Treatment Plan would include, but not be limited to, the applicable portions of the 2010 SVP Guidelines (section titles are from the 2010 SVP Guidelines): Adequate Monitoring, Macrofossil, Salvage, Avoidance and Site Protection, Microfossil Salvage, Samples, Preparation, Identification and Cataloging, Analysis, Storage, Reporting, and Compliance.

Finally, this mitigation measure has been clarified to include a WEAP. The WEAP is intended to provide training to construction personnel regarding paleontological resources protection requirements and protocols to be implemented on-site should a paleontological resource be discovered. The WEAP training is presented prior to the start of construction and will be repeated for those workers who were not at the initial training held for the Project Site.

Refer to Response to Comment Nos. 13-7 and 35-90 regarding the Draft EIR’s comprehensive analysis of potential impacts to paleontological resources.

Comment No. 35-92**K. The DEIR's Analysis of the Project's GHG Impacts Is Inadequate.**

The modeling used to quantify the GHG emissions suffers the same global issues as the modeling used for the DEIR's air quality and energy analyses. Specifically, the DEIR Conceptual Plan and DEIR Conceptual Program identified in the GHG analysis represent only one potential iteration of the Project. As such, the project ultimately constructed at the Project Site may differ substantially from what was input into the CalEEMod for GHG. Therefore, it is impossible to understand whether the Project's GHG emissions have been properly assessed. In addition, the CalEEMod for GHG does not include all of the uses actually contemplated in the DEIR Conceptual Plan and DEIR Conceptual Program because it omits all of the impact-generating uses within the two contemplated production levels. Moreover, the modeling only includes the sound stages, production support, production office, general office, retail uses and parking areas reflected in the DEIR Conceptual Program, notwithstanding that the Specific Plan would permit many other uses. (DEIR, Appendix B, CalEEMod for GHG, p. 341)

Ramboll identifies several other errors made in the inputs used in the CalEEMod for GHG. (Ramboll Letter, Comments 17 through 26) For example, the CalEEMod for GHG relies on defaults using the CalEEMod2020.4.0 version of the model. (*Id.*, pp. IV.E-47-48) However, an updated version of CalEEMod is available, CalEEMod 2022. The updated model could change the estimated electricity usage factors because the CalEEMod 2022 default electricity usage factors are based on 2019 consumption estimates using the California Energy Commission's ("CEC") 2018–2030 Uncalibrated Commercial Sector Forecast and 2019 Residential Appliance Saturation Survey ("RASS").⁴³ The DEIR should evaluate if electricity usage factors for each land use should incorporate the CalEEMod2020.4.0 relies on a 2009 RASS and 2002 CEC sponsored California Commercial End Use Survey for non-residential land uses.⁴⁴

While we recognize that no quantified GHG emissions thresholds apply to the Project and the DEIR therefore provides the information above for informational purposes, the preparers of the DEIR have an obligation to provide accurate and up-to-date information for a concrete, stable project. As such, the informational portion of the GHG analysis should be redone to address the Project's actual worst-case GHG impacts.

⁴³ CalEEMod2022 Appendix D, Technical Source Documentation for Emissions Calculations. Available at: https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf. Accessed: August 2021.

⁴⁴ CalEEMod2020.4.0 Appendix E, Technical Source Documentation for Emissions Calculations. Available at: <http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-e2020-4-0.pdf?sfvrsn=6>. Accessed: August 2021.

Response to Comment No. 35-92

The first paragraph of this comment is similar to Comment No. 35-53. Refer to Response to Comment No. 35-53.

Please see Response to Comment No. 26-E.1-35 for an explanation of why CalEEMod 2020.4.0 was the appropriate modeling software for the Draft EIR analysis and that, for informational purposes, Project emissions using CalEEMod 2022.1.1 have been prepared and are included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR). As discussed in Response to Comment No. 26-E.1-35, the results of CalEEMod 2022.1.1 in comparison to CalEEMod 2020.4.0 are similar and do not change any conclusion in the Draft EIR. However, operational GHG emissions with increased electrification of the Project to account for the City's new all-electric buildings ordinance (which was adopted after the Draft EIR was published) would increase GHG emissions in comparison to what was reported in Table IV.C-11 (Annual Project (Conceptual Land Use Program) GHG Emissions Summary (2026 Buildout Year)) of the Draft EIR. Electricity generation only takes into account carbon intensity at build out year and does not take into account decreasing carbon intensity in subsequent years required by SB 100, which accelerated the State's RPS target dates. The RPS would require utilities to supply 100 percent renewable energy by 2045. Thus, overall Project-related GHG emissions would similarly decrease over time as increased renewable energy is available.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Project Description is accurate, stable, and finite, and the Draft EIR comprehensively evaluated the potential impacts of the Project in accordance with CEQA.

Comment No. 35-93**L. The DEIR's Analysis of the Project's Hazards and Hazardous Materials Impacts Is Inadequate.****1. The DEIR Fails to Adequately Address How the Project Would Increase Existing Hazards at the Project Site.**

The DEIR describes existing hazards and hazardous materials that are part of operations of the Existing Television Studio. The DEIR also recognizes "[w]ith the proposed increase in floor area and increased production levels, it is anticipated that hazardous waste-generating activities could increase." (DEIR, p. IV.F-47) Examples of existing hazardous materials at the Project Site include: (1) six diesel generators; (2) one 1,000-gallon AST and four belly tanks of various sizes for diesel fuel (7,000, 1,000, 300, and 50 gallons); (3) two spray-paint booths; (4) hazardous material storage of water-based ink, non-PCB containing light ballasts, sewage, infectious/medical waste, paint-related wastes, and other

materials;⁴⁵ (5) natural gas fuel cell; and (6) above-ground clarifier for helipad. (DEIR, pp. IV.F-26, IV.F-28-29) Many of these materials are also identified in Figure IV.F-1, which depicts where on the Project Site the hazards and hazardous materials are located. (*Id.*, p. IV.F-26) However, the DEIR fails to explain which hazardous-waste-generating activities would increase and by how much they would increase. (*Id.*, p. IV.F-47) As such, it is impossible to know whether the Project would have any significant impacts related to increases in existing hazards or hazardous materials, or how these increases would impact nearby sensitive receptors, like Broadcast Center.

Similarly, despite the fact that Hackman is currently a “small quantity generator”⁴⁶ under RCRA, the DEIR provides no information about how the increase in production uses could change this categorization from small quantity generator to a large quantity generator, or something else entirely. (*Id.*, p. IV.F-48)

⁴⁵ The DEIR provides no information about the current location of the “hazardous waste storage area” that is currently used at the Project Site. (DEIR, p. IV.F-23) It also fails to address where the hazardous waste storage area would be located with the implementation of the Project, and whether it would be located close to nearby sensitive receptors.

⁴⁶ Per the U.S. EPA’s webpage on “Categories of Hazardous Waste Generators” under RCRA, “small quantity generators” generate more than 1 00 kilograms, but less than 1,000 kilograms of hazardous waste per month. Available at: <https://www.epa.gov/hwgenerators/categories-hazardous-waste-generators#small>. Accessed: September 2022.

Response to Comment No. 35-93

Refer to Response to Comment No. 26-78 for a discussion of current and anticipated use of hazardous materials. Please note that there are four existing spray paint booths on the Project Site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 35-94

2. The DEIR Does Not Substantiate How Mitigation Measure HAZ-MM-2 Would Reduce the Project’s Significant Impacts on the Public from Methane Gas and Hydrogen Sulfide During Construction or Operation.

Threshold (b) in Section IV.F (Hazards and Hazardous Materials) asks whether a project would “create a significant hazard to the **public** or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.” (DEIR, p. IV.F-42) The DEIR concludes that the Project would exacerbate the risk of upset and accident conditions associated with methane gas and hydrogen sulfide during construction and operation, and that these impacts would be significant without mitigation. (*Id.*, pp. IV.F-46–47, IV.F-50) The DEIR goes on to conclude that Mitigation Measure HAZ-MM-2⁴⁷ would reduce these significant impacts to a

less-than-significant level. (*Id.*, pp. IV.F-53–55) However, the measures included in Mitigation Measure HAZ-MM-2 only address worker safety during construction, not the overall public's safety during construction. And, they fail to address operations at all. Given the substantial number of sensitive receptors adjacent to and near the Project Site, HAZ-MM-2 needs to be strengthened to ensure that these significant public impacts are reduced to a less-than-significant level or the DEIR must acknowledge that the impacts are significant and unavoidable.

⁴⁷ The Ramboll Letter includes a substantial number of additional recommendations related to Mitigation Measure HAZ-MM-2 in Comment 59.

Response to Comment No. 35-94

Refer to Response to Comment Nos. 13-6 and 26-80 regarding methane impacts and Mitigation Measure HAZ-MM-2. As concluded in the Draft EIR, impacts related to methane during construction and operation would be less than significant. Thus, no changes need to be made to Mitigation Measure HAZ-MM-2. Please refer to Response to Comment No. 26-E.1-75, which discusses controls to mitigate the effects of subsurface gases on workers and the public.

Comment No. 35-95

3. The DEIR Does Not Adequately Address the Project's Potentially Significant Impact from Dewatering During Construction.

As indicated by Ramboll, the DEIR fails to adequately assess how dewatering activities at the Project Site could exacerbate existing offsite hazardous conditions. Specifically, dewatering could spread existing off-site contaminations in groundwater. (Ramboll Letter, Comment 57) The DEIR claims that the VOCs detected in groundwater at the Project Site are "likely related to an off-site upgradient release." (DEIR, p. IV.F-44) However, no obvious upgradient source is identified in the Phase I included as Appendix G to the DEIR or in the DEIR text itself. (Ramboll Letter, Comment 57) PCE was also shown at concentrations as high as 13 µg/L in groundwater in the northeast corner of the Project Site at concentrations above MCLs. (Appendix G, 2018 Phase I Environmental Site Assessment ["**2018 Phase I**"], pp. 95–96; 2017 Phase I Environmental Site Assessment, p. 703) TCE at 12 µg/L and cis-1,2-DCE (6.4 µg/L) were also identified in groundwater above MCLs at B-1 (near eastern site boundary south of adjacent apartments). (*Id.*, 2021 Site Summary Report, p. 36 [Table 9]) The 2018 Phase I also identifies various adjacent properties that were listed on the Leaking Underground Storage Tank databases and have received regulatory closure. These multiple adjacent properties were closed with methyl tertiary butyl ether and tertiary butyl alcohol remaining in groundwater. (*Id.*, 2018 Phase I, pp. 19-20) A more detailed analysis of the potential offsite source(s) is required because, if the existing contamination is the result of an offsite source, future dewatering activities may

result in additional contamination being pulled onsite and/or beneath adjacent residences and/or schools. (Ramboll Letter, Comment 57) The DEIR's hazards section does not address the effect of dewatering on these offsite properties or others within the radius-of-influence.

In addition, according to Ramboll, given the expected dewatering activities at the Project Site during construction, the DEIR and the soil management plan proposed in Mitigation Measure HAZ-MM-1 (the "Soil Management Plan") should have included specific recommendations related to dewatering during construction. (*Id.*, Comment 53) While the Soil Management Plan indicates that the general contractor shall implement any required treatment of groundwater, it is not clear if a permanent dewatering system will be required, and if so, what type of treatment will be required. (*Id.*)

Response to Comment No. 35-95

As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts. As discussed therein, the temporary dewatering system would be installed and operated in accordance with the NPDES discharge permit or industrial sewer permit requirements, and the specific dewatering system will be determined during the City's building permit process. Nevertheless, in response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction would be less than significant.

Refer to Response to Comment Nos. 26-E.1-70 and 26-E.1-73 for responses to the comments discussed in this comment.

Comment No. 35-96

4. The DEIR Does Not Address the Project's Potentially Significant Impact Related To Tar Removal During Construction.

The Project Site is located in a part of the City where tar naturally accumulates near the ground surface. (DEIR, p. IV.F-30) According to the DEIR, the Existing Television Studio has an existing subsurface tar removal system, and the accumulated tar is collected in 55-gallon drums for proper offsite disposal or recycling. (*Id.*) The DEIR assumes that excavation for the Project would be approximately 45 feet below grade. However, as noted by Ramboll, the hazards analysis does not disclose whether construction would require a

tar removal system or how tar will be managed during excavation. (Ramboll Letter, Comment 54) The Soil Management Plan also does not address tar collection or removal. (DEIR, pp. IV.F-50-53) As such, potential significant impacts to the public or construction workers from tar excavated from the Project Site are unknown.

Response to Comment No. 35-96

Refer to Response to Comment Nos. 13-4, 16-64, and 26-80 regarding naturally occurring tar, the tar collection system and the testing and disposal requirements for any impacted soil. Following extensive subsurface investigations and sampling, tar was noted only in an isolated area near the southwest boundary of the Project Site where a tar collection system is located and currently operating. It is not expected that any tar will be encountered during construction. Nevertheless, as discussed in Response to Comment No. 13-4, testing and proper disposal of any excavated soil impacted by naturally occurring oil and/or tar will follow the sampling, testing, and disposal procedures described in Section 5 of the Soil Management Plan (Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]) pursuant to Mitigation Measure HAZ-MM-1.

Comment No. 35-97

5. The DEIR Should Have Analyzed the Project's Potential Impact Related to Existing Underground Storage Tanks That Could be Encountered During Construction.

The Soil Management Plan is meant to provide protocols “to be implemented during design, construction, and post-construction of the Project in order to protect human health and the environment during any development activities that involve soil disturbance.” (*Id.*, p. IV.F-37) However, as indicated in the Ramboll Letter, the Soil Management Plan provides limited details regarding underground storage tanks (“USTs”), even though the DEIR concludes that the “status of any former USTs at the former Anderson V L gas station is unknown.” (Ramboll Letter, Comment 58; DEIR, p. IV.F-44)

According to Ramboll, it is also not clear if both locations of the former gas station were surveyed in the geotechnical investigation. As such, Ramboll concludes that the possibility of encountering former USTs should not have been dismissed in the DEIR. (Ramboll Letter, Comment 58) Ramboll recommends that specific recommendations related to encountering USTs be added (e.g., potential permitting, sampling, and analysis requirements) to the Soil Management Plan.

Response to Comment No. 35-97

Refer to Response to Comment No. 13-6 regarding USTs and the former gas stations.

Comment No. 35-98**6. The Hazards Analysis Does Not Address the Project's Potentially Significant Impact Related To Removal of Existing PV Panels During Construction.**

The Project Site currently has a significant number of PV Panels. Project Design Feature GHG-PDF-2 mandates the installation of additional PV Panels on the Project Site that are capable of generating a minimum of 2,000,000 kWh annually, a 383,000 kWh increase from the existing condition. (*Id.*, p. IV.E-51) However, the hazards analysis does not address how Hackman would remove and dispose of the existing PV Panels. Importantly, as noted by Ramboll, PV Panels contain heavy metals and may be classified as a hazardous waste. (Ramboll Letter, Comment 55) However, Threshold (b) does not address the potentially significant impact related to how these PV Panels could cause a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (DEIR, pp. IV.F-42-43)

Response to Comment No. 35-98

Refer to Response to Comment No. 26-84 regarding solar panels.

Comment No. 35-99**M. The DEIR's Analysis of the Project's Hydrology and Water Quality Impacts Is Inadequate.****1. The DEIR's Analysis of Stormwater Runoff Is Inadequate.**

The DEIR does not adequately analyze whether the Project would result in surface water runoff that would cause impacts related to hydrology or water quality.

The DEIR presents the existing and proposed stormwater runoff flows for the 50-year storm event in Table IV.G-1. (DEIR, p. IV.G-36) The DEIR cites the Hydrology Report, included as Appendix H to the DEIR, as the source for the surface flow rate data. (*Id.*, pp. IV.G-35, 36 [Table IV.G-1]) The Hydrology Report presents the existing and proposed peak flow rates for stormwater for the 50-year frequency design storm event runoff (Q_{50}). (*Id.*, Appendix H, p. 34 [Table 2]) Table 2 provides that the existing flow rate of 53.47 cubic feet per second would remain exactly the same after Project implementation. The Hydrology Report provides the stormwater runoff estimates based on HydroCalc for the existing and proposed condition of the Project Site. (*Id.*, pp. 44-49 [Figure 4]) However, as the input parameters are exactly the same for the existing and proposed scenarios, the HydroCalc modeling is entirely without value. (Ramboll Letter, Comment 47a) Therefore, the DEIR

does not provide adequate support for the statement that “runoff flows during Project operation would remain the same at 53.47 cfs during a 50-year storm event.” (DEIR, p. IV.G-36)

The DEIR also states that “the Project Site would continue to be comprised of up to approximately 90 percent impervious surfaces following Project buildout” to support the claim that surface runoff would remain exactly the same. (DEIR, p. IV.G-35) However, there is no evidence to support the assumption that the Project would not increase the Project Site’s impervious surface area. In addition, as the DEIR includes no project design feature or recommended mitigation measure that would limit the Project Site’s impervious area, surface water runoff could increase. In fact, the Hydrology Report states that “[t]he Project is expected to **increase** or maintain the overall percentage of impervious area from the current condition of the Project Site.” (DEIR, Appendix H, p. 33, emphasis added) Therefore, the DEIR analysis of surface water runoff relies on unsubstantiated claims regarding the amount of impervious area on the Project Site that would result from Project implementation.

In addition, the DEIR provides inconsistent information regarding the volume of stormwater to be captured onsite in accordance with the City’s Low Impact Development (“LID”) requirements. The text states that “[t]he Project will need to capture and use up to 625,000 gallons of water on-site.” (DEIR, Appendix H, p. 29)

However, Figure IV.G-1 in the DEIR (Project Site Drainage), which is the same as Figure 3 in the Hydrology Report (Proposed Drainage Exhibit), provides that only 567,854 gallons would be captured. (*Id.*, p. IV.G-21, Appendix H, p. 43) In addition, the Hydrology Report does not specify whether either figure represents annual, monthly or daily capture volumes and how the volumes relate to the provided surface water runoff flow rates. (Ramboll Letter, Comment 47b) The lack of consistent information calls into question the DEIR’s claims regarding the Project’s compliance with LID standards as well as the quantity and quality of surface water runoff that would result from the Project.

Furthermore, the DEIR’s reliance on the future design and implementation of LID Best Management Practices (“BMPs”) represents an impermissible deferral of environmental review of the Project’s stormwater impacts and the formulation of feasible mitigation for any significant stormwater impact. The DEIR relies on the proposed LID BMPs to support its finding of less than significant with respect to multiple impacts. (DEIR, pp. IV.G-30, IV.G-34, IV.G-37) For example, the DEIR provides no assessment of the level of pollutants in the surface water runoff resulting from the Project. (Ramboll Letter, Comment 47e) As explained in the DEIR, “[a]nticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease, similar to existing conditions. The implementation of BMPs required by the City’s LID Ordinance

would target these pollutants that could potentially be carried in stormwater runoff.” (DEIR, p. IV.G-30)

However, the DEIR defers the design and analysis of the LID system, resulting in lack of clarity as to whether the Project would be able to capture any stormwater onsite at all. According to the DEIR, “the Project would include the installation of stormwater capture and use or biofiltration/bioretenction BMPs as established by the LID Manual.” (*Id.*, p. IV.G-34) As explained in the Hydrology Report, “if capture and use is later determined to not be feasible, the Project would then be required to implement high efficiency biofiltration/bioretenction systems pursuant to applicable regulatory requirements.” (*Id.*, Appendix H, p. 29) Accordingly, the DEIR does not even provide basic information as to the type of LID improvement to be implemented. Therefore, the DEIR does not support the claim that “[t]he Project’s proposed BMPs would address the stormwater runoff quality and quantity.” (*Id.*, p. 34) So, the public and decisionmakers are left with no real idea of what stormwater impacts the Project would have, how those impacts would specifically be addressed by future LID BMPs, and whether those BMPs would actually be effective.

The DEIR also states that “the City’s preferred LID improvement is on-site infiltration of stormwater, since it allows for groundwater recharge and reduces the volume of stormwater entering municipal drains.” (DEIR, p. IV.G-16) However, the Hydrology Report states that “[a]ccording to the Preliminary Geotechnical Investigation prepared for the Project Site, groundwater infiltration is not feasible for the Project Site.” (*Id.*, Appendix H, p. 29) The Hydrology Report provides no text for the footnote that appears next to this statement. (Ramboll Letter, Comment 47d) The Preliminary Geotechnical Engineering Investigation includes only a single sentence on the topic: “Due to the groundwater level, the depth of the proposed subterranean level, and the relatively cohesive nature of the surficial native soils, stormwater infiltration will not be feasible for the Project.” (DEIR, Appendix E, p. 55) This explanation does not provide substantial evidence of the infeasibility of stormwater infiltration. The Hydrology Report and DEIR should be updated to include soil sampling results to demonstrate soil conditions and inform decisionmakers and the public about the potential for infiltration of stormwater and to identify ways that any significant impact related to stormwater management and groundwater recharge can be avoided or reduced.

The DEIR also states that “the Project’s stormwater infrastructure would be designed to convey the 50-year storm to the designated discharge location.” (DEIR, p. IV.G-36, Appendix H, p. 34) However, the discharge location is not designated in the analysis. The DEIR specifies that existing “surface water runoff is conveyed into the City system via an existing 24-inch stormwater pipe that slopes west to the existing 90-inch by 144-inch stormwater pipe within Fairfax Avenue.” (DEIR, Appendix H, p. 21) However, the DEIR does not specify how stormwater would be conveyed after Project implementation, providing only that “[s]tormwater runoff from the Project Site and surrounding properties will

discharge toward City catch basins and underground storm drain pipes which convey stormwater through various underground pipe networks into the Ballona Creek.” (*Id.*) There is no indication of whether the existing 24-inch stormwater pipe that connects to the Fairfax Avenue stormwater pipe would continue to convey stormwater after redevelopment. (Ramboll Letter, Comment 47c) Thus, the DEIR does not provide sufficient analysis of the proposed stormwater infrastructure to support the conclusion that stormwater would not lead to flooding and would not exceed stormwater infrastructure capacity.

Response to Comment No. 35-99

The issues discussed in this comment are similar to those in Comment Nos. 26-E.1-59 through 26-E.1-62. Refer to Response to Comment Nos. 26-E.1-59 through 26-E.1-62.

The implementation of LID BMPs is not an impermissible deferral of environmental review of the Project’s stormwater impacts. Rather, the LID Ordinance is one part of the regulatory framework for which the Project is evaluated, and the Project will comply with the LID Ordinance. Compliance with the LID ordinance means implementation of LID BMPs, and implementation of LID BMPs means the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., the Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Refer to Section 6.2.2 of the Hydrology and Water Quality Report included as Appendix H of the Draft EIR.

The commenter also claims that reliance on the LID BMPs pursuant to the LID Ordinance constitutes improper deferral of environmental review and the formulation of feasible mitigation. CEQA Guidelines Section 15126.4 expressly provides that the specific details of a mitigation measure may be developed after project approval “provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure.” Further, with respect to reliance on regulatory programs for mitigation, CEQA Guidelines Section 15126.4 also provides that “Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.” Given these provisions of CEQA Guidelines Section 15126.4, numerous courts have rejected claims of improper deferral of

mitigation measures when the mitigation measure relies on an existing regulatory program that is designed to avoid the significant environmental impact at issue. (See e.g., *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1059–1060; *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 908909.)

Comment No. 35-100

2. The DEIR's Analysis of Dewatering Is Inadequate.

The DEIR inadequately addresses the Project's potential groundwater impacts from construction dewatering. (DEIR, pp. IV.G-29, IV.G-30–31, IV.G-33, and IV.G-43) The Hydrology Report fails to describe the approach to construction dewatering or to provide quantitative analysis related to construction dewatering, which undermines the DEIR's conclusions regarding the Project's surface water and groundwater impacts. (Ramboll Letter, Comment 48) As the Ramboll Letter explains, "[d]ewatering can cause the development of hydraulic gradients that are also necessary for drawing out water towards the Site. With the possibility of off-site contamination in groundwater, dewatering can result in mobilizing the contaminants towards the Site." (Ramboll Letter, Comment 48b) However, the DEIR limits its analysis of groundwater quality impacts from construction dewatering to the discharge of pumped groundwater and ignores potential impacts related to the subsurface migration of contaminated groundwater. (DEIR, p. IV.G-31) Thus, the DEIR fails to provide adequate analysis of the Project's impact on groundwater quality due to dewatering.

Furthermore, the DEIR's reliance on the future design and implementation of the required treatment or mitigation of water discharged from dewatering operations represents an impermissible deferral of environmental review of dewatering impacts and the formulation of feasible mitigation for any significant dewatering impacts. The DEIR states that "temporary groundwater dewatering systems would be designed and implemented in accordance with NPDES permit requirements." (DEIR, p. IV.G-43) However, the required treatment or mitigation measures that Hackman would use to meet the permit limits are not documented or discussed anywhere in the DEIR or Hydrology Report. (Ramboll Letter, Comment 48c) Therefore, the DEIR does not adequately support the DEIR's conclusion that construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality.

The DEIR and Hydrology Report also omit any discussion of the Project's impact related to potential operational dewatering activities. According to the Hydrology Report, the depth-to-water measurements on the Project Site vary from 8 to 30 feet, while the project construction activities would include the excavation to a depth of approximately 15 to

45 feet below existing Project Site grade. (DEIR, Appendix H, pp. 25, 34) According to the Ramboll Letter, the shallow groundwater depth and artesian groundwater conditions indicate that operational dewatering is likely necessary. (Ramboll Letter, Comment 48) The DEIR, however, fails to analyze any potential surface water or groundwater impacts associated with operational dewatering.

Dewatering may also impact groundwater levels in the vicinity, and the DEIR fails to adequately analyze that potential impact. The Hydrology Report claimed that "... no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site...", without providing any reference. (DEIR, Appendix H, p. 38) The DEIR does not provide any substantial evidence to support its conclusion that groundwater levels would be unaffected by dewatering activities. (Ramboll Letter, Comment 48d) Therefore, the DEIR inadequately analyzes the Project's potential impact related to groundwater supplies.

In general, the DEIR does not adequately analyze dewatering activities associated with the Project. While the DEIR does not provide any quantitative analysis of dewatering, dewatering could result in the removal of approximately 120,000 cubic yards of groundwater in connection with the excavation required for the Project, as calculated in the Ramboll Letter. (Ramboll Letter, Comment 48f) That is enough water to fill approximately 37 Olympic-size swimming pools. The removal and discharge of this quantity of groundwater could result in significant impacts on groundwater and surface water hydrology and quality that the DEIR fails to adequately analyze.

Furthermore, a much greater amount of dewatering may be required if the excavation depth were to exceed 45 feet. Hackman could choose to provide more levels of subterranean parking than contemplated in the DEIR Conceptual Plan, which could increase the excavation depth on portions of the Project. The DEIR Conceptual Plan is simply an illustrative scenario and Hackman is not bound by it. Moreover, the DEIR does not include any project design feature or recommended mitigation measure that would limit the extent of excavation for the Project, so the maximum excavation depth is no more than an unsubstantiated assumption. (DEIR, p. IV.G-29) Therefore, the limited analysis of dewatering activities that may be required for the Project does not represent a worst-case scenario of the Project's potential impacts on hydrology and water quality.

Response to Comment No. 35-100

Refer to Response to Comment No. 26-E.1-65 for responses to the comments discussed in this comment. As discussed in Response to Comment No. 3-7, the Project would require temporary construction dewatering and not permanent dewatering. Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts, a detailed discussion of construction dewatering

and potential cone of depression and gradients estimates. In response to comments regarding the Draft EIR's dewatering analysis, an evaluation of dewatering conditions for the temporary excavation and construction of a below-grade parking structure is provided in Appendix FEIR-13 of this Final EIR for informational purposes. This evaluation confirms the conclusion in the Draft EIR that impacts associated with dewatering activities during construction, including settlement and subsidence effects, would be less than significant. The maximum excavation depth of approximately 45 feet was determined based on the proposed development program described on pages II-12 to II-35 of Section II, Project Description, of the Draft EIR. Any additional excavation would require additional CEQA review.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan.

Refer to Response to Comment No. 26-61 regarding the amount of water that would be dewatered during Project construction, which represents only 0.05 percent of the capacity of the Hollywood Subbasin.

Refer to Response to Comment No. 26-E.3-26 for a discussion of the lack of artesian conditions at the Project Site.

Comment No. 35-101

N. The DEIR's Analysis of the Project's Land Use and Planning Impacts Is Inadequate.

The fundamental inadequacy of the DEIR's land use and planning analysis primarily stems from the unstable project description and absence of a Specific Plan for public review and consideration, issues discussed extensively in Section II.B, *infra*.

1. The Land Use Analysis Relies on the "Illustrative" DEIR Conceptual Plan.

The DEIR's land use impact analysis addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Conservation Element, Mobility Plan 2035, Wilshire Community Plan, LAMC and Citywide Design Guidelines. (DEIR, p. IV.H-39) This consistency analysis relies on an "illustrative" DEIR Conceptual Plan, which, as discussed previously, is simply one development "scenario" among unlimited scenarios that might result from the adoption of the Specific Plan, a document that the public has still had no opportunity to review.

Without a concrete, stable project description that reflects the actual Project to be constructed, the DEIR's land use consistency analysis is meaningless because one cannot

demonstrate consistency with a project that does not actually exist. Even if the DEIR Conceptual Plan is consistent with this Wilshire Community Plan policy or that Mobility Plan 2035 standard, there is no assurance whatsoever that the actual project Hackman chooses to develop would be. Moreover, in the continuing absence of a Specific Plan to review, which presumably means that it does not exist yet, at least is in substantial flux, how can the public have any confidence that the final provisions in the Specific Plan, including provisions that are not even summarized in the DEIR or stated in generic terms, will be consistent with applicable laws? There is simply no reliable information in the DEIR from which to assess whether implementation of the Specific Plan could result in a significant impact due to a conflict with an applicable plan or policy. (See Ramboll Letter, Comments 1 and 2)

In addition, the Specific Plan summary in the land use summary excludes the TVC 2050 Sign District and “Public Realm Improvements” (DEIR, pp. IV.H-30-37), which apparently will not be addressed in the Specific Plan and are discussed separately in the land use analysis. If that is the case, then when will the public have an opportunity to review the proposed Sign District Ordinance that would regulate the future development of signage on the Project Site, in order to determine whether it is consistent with applicable laws? As to Public Realm Improvements, there are no project plans that include those improvements, just a few graphic snippets in the DEIR. Is Hackman required to adhere to the standards summarized in the DEIR? Will, for example, the City condition the Project to provide a required “minimum” of 28,900 square feet of open space within the Public Realm Improvements along the Project Site boundaries, as illustrated in Figure IV.H-3 through Figure IV.H-6 in the DEIR? (*Id.*, pp. IV.H-33-36)

Response to Comment No. 35-101

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 26-5 regarding the proposed Specific Plan, the fact that a Specific Plan was not required to be included as part of the Draft or Final EIR, and how the physical aspects of the proposed Specific Plan are fully accounted for in Section II, Project Description, of the Draft EIR and in the associated impact analyses throughout the Draft EIR. Also refer to Topical Response No. 1 and Response to Comment Nos. 5-5, 9-12, and 9-13 regarding how the Conceptual Site Plan depicts the Project, including the public realm improvements, and how the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As explained in detail in Topical Response No. 1, the Project Description is accurate, stable, and finite and fully complies with CEQA. The physical aspects of the Project presented in Section II, Project Description, of the Draft EIR, including the Conceptual Site Plan and other graphics, the description of the proposed Sign District (which is consistent with the Sign District), and the description of the public realm improvements were used to conduct the analysis for the potential for the Project to conflict with applicable land use plans in Section IV.H, Land Use and Planning, of the Draft EIR, which concluded that the Project would not conflict with any applicable plans and policies, and impacts would be less than significant. Section IV.H, Land Use and Planning, of the Draft EIR also includes additional details about the proposed Sign District and public realm improvements that were used in the land use analysis. In short, sufficient Project information was available to provide a thorough analysis of the Project's potential to conflict with applicable land use plans and regulations in accordance with CEQA. Also note that the public realm improvements are incorporated into the Preliminary Draft Specific Plan.

Comment No. 35-102

2. The DEIR Fails to Support its Land Use Consistency Findings With Substantial Evidence.

The land use consistency findings in the DEIR are flawed for the reasons set forth below.

a. Land Use Chapter of General Plan Framework.

The DEIR claims that the Project would support Objective 3.2 to provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution, as well as Policy 3.2.3 to provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate location. (DEIR, p. IV.H-39) This conclusion solely relies on the provision of a Mobility Hub onsite that “would facilitate the use of public transit and support opportunities for walking and biking, thus promoting an improved quality of life.” (*Id.*, p. 40) This consistency finding is flawed because, as discussed in Section II.B, *infra*, this project component is conceptual. Hackman has not proposed a concrete development project with plans that include the suggested Mobility Hub, nor does the DEIR indicate that the Mobility Hub requirements would be included in the undisclosed Specific Plan.

b. Open Space and Conservation Chapter of General Plan Framework.

The consistency analysis with the Open Space and Conservation Chapter of the General Plan exclusively relies on the Public Realm Improvements depicted on DEIR pages IV.H-33 through IV.H-36, which would apparently include a “minimum” of 28,900 square feet of open space. (*Id.*, p. IV.H-40; Appendix I, pp. 9–10) This analysis does not hold up because, as previously discussed, there is no assurance that Hackman would be required

to provide the Public Realm Improvements in the manner suggested in the DEIR. Moreover, even if Hackman was bound to provide the minimum open space, it could apparently be located anywhere on the Project Site given the “illustrative” nature of the DEIR Conceptual Plan. Furthermore, widening and landscaping existing sidewalks does not add actual open space (*i.e.*, public park or recreation area) or promote conservation. (Ramboll Letter, Comment 2)

Response to Comment No. 35-102

Contrary to the assertion of the commenter, the Mobility Hub is an essential feature of the Project. The Mobility Hub is part of Project Design Feature TR-PDF-2, which is included in the Mitigation Monitoring Program for the Project (Section IV of this Final EIR). The Draft EIR’s conclusion that the Project would not conflict with Objective 3.2 and Policy 3.2.3 of the General Plan Framework is also based on the Project’s improved integration of uses and on-site circulation, as well as amenities, such as retail and commissary uses, childcare and fitness facilities, etc., as discussed on pages 3 and 4 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR. Also refer to Response to Comment No. 16-72 regarding the Project’s pedestrian-oriented design.

With respect to open space, the Project is not required to provide any under the LAMC because no residential uses are proposed. Refer to Response to Comment No. 16-47 regarding improvements to the street frontages and pedestrian facilities that promote safety and enhance the public realm. The public realm improvements are also a required component of the Project and would be ensured as a condition of approval for the Project. As such, as set forth in the Draft EIR, the Project would not conflict with the relevant policies of the Open Space and Conservation Chapter of the General Plan Framework Element, as discussed on pages 9 to 10 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR.

Comment No. 35-103

c. General Plan Conservation Element.

The DEIR’s land use analysis concludes that the Project would “protect and important historical resource, consistent with the goal, objectives, and policies of the Conservation Element” through compliance with the Specific Plan’s historic preservation regulations and Office of Historic Resources would review all project construction documents prior to approving building permits to ensure compliance with Rehabilitation Standards. (DEIR, p. IV.H-42-43) This finding is flawed because it relies on the improper conclusion that the Project Design Features CUL-PDF-1 and CUL-PDF-2 and Specific Plan regulations would adequately mitigate potential historical resources impacts to the Primary Studio Complex. As presented in Section II.E, *infra*, the development of the Project would materially impair the significance of the Primary Studio Complex.

Response to Comment No. 35-103

This comment that the Project would materially impair the significance of the Primary Studio Complex is incorrect. Refer to Sections B, Historic Structure Report and the Future Preservation of the Primary Studio Complex; C, Potential New Construction North of the Primary Studio Complex; and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources. As demonstrated in the analyses within the Draft EIR and summarized in these topical responses, the Project would indeed protect the Primary Studio Complex, an important historical resource, consistent with the goals, objectives, and policies of the Conservation Element as stated on pages IV.H-42 and IV.H-43 of the Draft EIR.

Comment No. 35-104**d. Mobility Plan 2035.**

The DEIR's land use analysis omits any discussion of the Project's consistency with the public right-of-way requirements in Mobility Plan 2035. Instead, the reader must refer to Section IV.K (Transportation) of the DEIR to find the street standard consistency analysis. (DEIR, p. IV.K-56) Based on a close review of Vesting Tentative Tract Map No. 83387 (the "VTTM") for the Project which Hackman has filed with the City, and the Mobility Plan 2035 consistency analysis in Section IV.K (Transportation) and Appendix M to the DEIR, the DEIR fails to disclose certain deviations from applicable street standards.

Pursuant to Mobility Plan 2035: Beverly Boulevard, a Modified Avenue I, would require a 35-foot half-width and 15-foot sidewalk to complete a 50-foot half-width right-of-way; Fairfax Avenue, an Avenue II, would require a 28-foot half-width roadway and 15-foot sidewalk to complete a 43-foot half-width right-of-way; and The Grove Drive, a Collector Street, would require a 20-foot half-width right-of-way and 13-foot sidewalk to complete a 33-foot half-width right-of-way. (DEIR, Appendix M, p. 705 of PDF)

According to the DEIR, Beverly Boulevard has an existing half-right-of-way width of 50 feet and meets the Mobility Plan 2035 standard of 50 feet. However, the sidewalk width toward Fairfax Avenue where the roadway widens slightly (up to three feet), the sidewalk is reduced to approximately 12 feet. Hackman does not propose to change this condition and has not sought a waiver of dedication to allow for the substandard sidewalk width. Instead, the DEIR states that in consultation with the City's Bureau of Engineering ("BOE"), the existing configuration is considered generally compliant with Mobility Plan 2035 and no dedication or widening is required. (*Id.*, Appendix M.1, p. 6) The DEIR does not reference an Interdepartmental Correspondence from BOE to the Advisory Agency finding that the proposed substandard sidewalk condition on Beverly Boulevard is consistent with Mobility Plan 2035. For these reasons, the consistency finding is not supported by substantial

evidence. Hackman must request a variable three-foot waiver of dedication to permit the reduced sidewalk shown on the filed VTTM.

On Fairfax Avenue, the existing half-right-of-way width is 50 feet and thus exceeds the Mobility Plan 2035 standard of 43 feet. Hackman is requesting a merger and re-subdivision of the seven-foot excess, which would reduce the existing sidewalk area in the public right-of-way to three feet. As a result, a combination of public and private property would be used to create a pedestrian sidewalk. Specifically, the Project would include the dedication of a 12-foot public sidewalk easement to complete an overall 15-foot sidewalk to accommodate pedestrian travel. (*Id.*, Appendix M.1, pp. 5–6) A request to provide the 12 feet as an easement in lieu of dedication is not included in the Project Application as it relates to the VTTM. Hackman was required to request this waiver of dedication in the Project Application, but did not, to permit the reduced sidewalk dedication as part of the requested VTTM.

On The Grove Drive, the existing half-width right-of-way is 30 feet, which is three feet under the Mobility Plan 2035 requirement of 33 feet. As such, the Project entitlements, as reflected in the VTTM, include a request to waive a three-foot dedication and a proposal to widen the roadway by two feet to accommodate a northbound left-turn lane to access the Project Site, and also provide a three-foot public sidewalk easement to provide a 10-foot sidewalk. The proposed condition of the roadway would exceed the 20-foot requirement at 23 feet and the sidewalk would be narrower than the 13-foot requirement at ten feet (*i.e.*, three-foot easement plus seven-foot dedication). (*Id.*, Appendix M.1, p. 6) While the proposed sidewalk width is slightly wider than the existing nine-foot wide sidewalk, a request to provide the three feet as an easement in lieu of dedication is not included in the VTTM. Hackman was required to request this waiver of dedication in the Project Application, but did not, to permit the reduced sidewalk dedication as part of the VTTM.

Response to Comment No. 35-104

Refer to Response to Comment Nos. 16-30 and 16-76 regarding sidewalk widths and the waiver of dedication request included with the Project's Vesting Tentative Tract Map application.

As noted by the commenter, Section IV.K, Transportation, of the Draft EIR includes a consistency analysis with the Mobility Plan's street standards. Specifically, page IV.K-56 provides a detailed description of the Mobility Plan's half-ROW requirements and the Project's proposed roadway dedications, mergers, improvements, and waivers of dedication adjacent to the Project Site. As described therein, the existing ROW meets or exceeds dedication requirements on Fairfax Avenue and Beverly Boulevard (though a portion of Beverly Boulevard and all of Fairfax Avenue provides a wider roadway and narrower sidewalk). The Project Conceptual Site Plan has been reviewed by LADOT and

Bureau of Engineering and found to be consistent with or exceed Mobility Plan standards for roadway width and sidewalk width on Fairfax Avenue and Beverly Boulevard. Refer to Response to Comment Nos. 16-30, 16-72, and 16-76 regarding the Project's pedestrian-oriented design, sidewalk widths, and public realm enhancements and correspondence provided by BOE dated July 14, 2021. Based on the absence of any policies in the Mobility Plan that conflict with the Project, the Project is not inconsistent with the Mobility Plan regardless of any future determination (approval or dismissal) of the proposed waiver of dedication.

Comment No. 35-105

O. The DEIR's Analysis of the Project's Noise Impacts Is Inadequate.

The DEIR's noise analysis is wholly inadequate for many reasons. Many of the flaws in the analysis flow from (1) the DEIR's failure to establish the baseline noise currently generated within the Project Site from operations, including outdoor production activities and special events, (2) the DEIR's failure to analyze all onsite noise generators and (3) the DEIR's unstable project description. As a result, the DEIR fails to evaluate the noise impacts associated with Hackman's proposed intensification of existing outdoor uses, as well as the introduction of many new outdoor uses, which would degrade the quality of life of surrounding neighbors, including Broadcast Center residents.

Response to Comment No. 35-105

Refer to Response to Comment No. 26-146 for the existing and future noise levels associated with outdoor production activities. As analyzed therein, noise impacts associated with outdoor production activities and special events would be less than significant.

Noise associated with onsite noise sources, including mechanical equipment, parking facilities, outdoor spaces (people gathering and amplified sound), loading, and trash compactors, were fully analyzed in the Draft EIR. In addition, additional noise analysis for onsite outdoor production activities (see Response to Comment No. 26-146), onsite truck movements (see Response to Comment No. 26-141), and the Mobility Hub (see Response to Comment No. 35-129) were conducted to confirm the conclusions in the Draft EIR that operational noise impacts would be less than significant. Refer to Appendix FEIR-16 of this Final EIR for the supplemental noise analysis. Based on the Draft EIR and the additional analysis, noise impacts associated with onsite noise sources at all offsite noise sensitive receptors would be less than significant. Also note that during operation of the Project, emergency generators would be included for emergency use during a power outage and regularly tested for maintenance purposes but otherwise would not be used to provide power to basecamps, which would be outfitted with electric tie-ins.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Comment No. 35-106

1. The Discussion of Regulatory Setting Omits the Sound Amplification Restrictions in the City's Noise Ordinance.

The DEIR summarizes the City's noise regulations. (DEIR, pp. IV-I-15–16) However, the DEIR omits any discussion of the restrictions on amplified sound set forth in Section 112.01 and Article 5 of the City's Noise Ordinance. In particular, LAMC Section 112.01(b) prohibits any noise level caused by sound amplifying equipment which is audible (a) at a distance in excess of 150 feet from the property line of the noise sources or (b) within any residential zone or 500 feet thereof. LAMC Section 115.02(f) further states that sound emanating from sound amplifying equipment shall not be audible at a distance in excess of 200 feet from the sound equipment. As a result, the DEIR fails to include the proper significance thresholds for determining whether the amplified sound associated with the Project would be significant. (Ramboll Letter, Comments 27–27.a)

Response to Comment No. 35-106

This comment raises the same topics as Comment No. 26-E.1-40. Refer to Response to Comment No. 26-E.1-40 regarding the LAMC regulations that are applicable to the Project and the appropriate significance thresholds used in the Draft EIR analysis for noise.

Comment No. 35-107

2. The Noise Analysis Failed to Analyze All Sensitive Receptors in the Project Site Vicinity.

The noise analysis is based on eight sensitive noise receptors (R1–R8) and two potential offsite construction staging areas (R9 and RIO). (DEIR, p. IV.I-18, 19, Figure IV.I-3) The noise analysis, however, omits as a sensitive receptor the residence at 7659 Beverly Boulevard, also known as the Rancho La Brea Adobe or Gilmore Adobe, located south of the Project Site, and therefore fails to analyze the Project's noise impact on it.

We understand the Gilmore Adobe is a “historic residence that is actively used, and its outdoor gardens have historically functioned, and continue to function, as cultural civic and philanthropic gathering places.” (Kathryn McGee Letter to Cultural Heritage Commission dated August 17, 2022, p. 1) The residential receptor is sited approximately 130 feet from the Project Site's southern property line and would be within close proximity to construction activities for one or more new buildings up to 225 feet in height. The noise analysis must

be augmented to evaluate the Gilmore Adobe's existing noise levels, the extent to which the Project would increase those noise levels, and necessary mitigation measures. (Ramboll Letter, Comment 29)

Response to Comment No. 35-107

Refer to Response to Comment No. 26-139 for a discussion of the Gilmore Adobe. As discussed therein, impacts would be less than significant if the Gilmore Adobe were treated hypothetically as a residential use.

Comment No. 35-108

3. The Baseline Ambient Noise Levels Are Flawed.

The DEIR's analysis of existing noise levels is based on a monitoring study that consisted of collecting a 24-hour measurement at receptor location R1 (Broadcast Center), two 15-minute measurements conducted during daytime and nighttime hours at receptors R2 through R8, and one 15-minute measurement at the staging area receptors R9 and R10 during daytime hours only. (*Id.*, p. IV.I-19)

As discussed in the Ramboll Letter, the existing noise levels presented in the DEIR are inadequate and misleading because they do not reflect the current existing conditions during quieter weekday nighttime hours and quieter weekend daytime and nighttime hours. The level of monitoring conducted for receptors R2 through R10 are wholly inadequate as the methodology used in this case is inconsistent with typical community noise survey durations as specified and recommended in industry standards for assessing community noise. (ANSI S12.9-1992/Part 2 [R2018]—Quantities and Procedures for Description of Environmental Sound) Accordingly, the ambient survey must be redone to be consistent with industry standards, and the Project's noise impacts must be reanalyzed based on accurate and complete baseline ambient noise levels. (Ramboll Letter, Comment 30)

Moreover, Table IV.I-6 (Existing Ambient Noise Levels) provides the Community Noise Equivalent Level ("CNEL") at each sensitive receptor and estimates CNEL based on the short 15-minute noise measurement. Except as it relates to receptor R1 (which was measured for 24 hours), this is misleading because CNEL is a 24-hour average of sound level, so estimating CNEL based on one extremely short measurement conducted during noisier daytime or evening hours does not accurately depict existing conditions. (Ramboll Letter, Comment 32)

Moreover, the DEIR's analysis of existing noise levels is facially inadequate because it simply ignores existing noise impacts associated with existing operations on the Project Site. There is no discussion of the existing amplified sounds and other noise from outdoor

production activities, special events, helicopters, and other outdoor uses, which all contribute significantly to the current conditions. Without data regarding these baseline noise levels, the DEIR cannot properly evaluate the Project's noise impacts or the extent to which the Project would increase those noise levels. Furthermore, as raised in the Ramboll Letter, "[a]re current activities and operations compliance with all applicable noise ordinances? What is the recent history, if any, of noise complaints related to activities and operations associated with the production facility?" (Ramboll Letter, Comment 31)

Response to Comment No. 35-108

Refer to Response to Comment Nos. 26-E.1-5 and 26-E.1-43 for a discussion of existing ambient noise measurements and procedures that were appropriately utilized in the Draft EIR.

Refer to Response to Comment No. 26-E.1-45 for a discussion of the use of CNEL values.

Refer to Response to Comment Nos. 26-140 and 26-146 for the existing and future noise levels associated with outdoor production activities. As analyzed therein, noise impacts associated with outdoor production activities would be less than significant.

Refer to Response to Comment Nos. 16-87 and 26-15 for a discussion of the helipad. As discussed therein, noise levels due to helicopter operations at the helipad would be slightly lower as compared to the existing conditions, due to additional sound attenuation provided by a higher helipad location.

Comment No. 35-109

4. Mitigation Measure NOI-MM-1 Does Not Address Elevated Levels (Above-Ground Level) at Each Receptor.

Mitigation Measure NOI-MM-1 would require the installation of temporary and impermeable sound barriers, of unspecified heights, designed to a minimum noise reduction level at the ground level of receptors R1 through R8 during construction of the Project. (DEIR, p. IV.I-56) In particular, a temporary barrier would be required along the eastern property line of the Project Site and the western boundary of the BC Site to provide a minimum 16-A-weighted decibels ("dBA") noise reduction at the ground level of Broadcaster Center (R1). (*Id.*)

This proposed mitigation, however, is meaningless to Broadcast Center because there are no residential units on the ground floor of the building. Why is the mitigation limited to the ground level, given that Broadcast Center includes six stories, with windows and balconies

just seven feet from the Project Site's eastern property line? How would construction noise be mitigated at elevated levels at Broadcast Center and the other receptor locations? (Ramboll Letter, Comment 44) Is it feasible to mitigate construction noise above ground level? If so, to what extent? If not, why? Are there feasible mitigation measures that could substantially reduce the Project's construction noise impact on Broadcast Center? The DEIR answers none of these questions.

Response to Comment No. 35-109

Refer to Response to Comment No. 26-136 for a discussion of how Mitigation Measure NOI-MM-1 has been augmented in response to public comments to include a 30-foot temporary noise barrier along the Shared Eastern Property Line that would further reduce noise levels at the upper floors of the Broadcast Center Apartments.

Comment No. 35-110

5. The DEIR Fails to Demonstrate That Implementation of NOI-PDF-4 Regarding Outdoor Roof Deck Gathering Spaces Would Comply With LAMC Section 115.02(f) Regarding Amplified Sound.

While NOI-PDF-4 imposes maximum noise levels that would be implemented through the design of the speaker sound systems on outdoor roof deck gathering spaces, the Project Design Feature must be revised to strictly comply with the regulatory requirements in LAMC Section 115.02(f) regarding sound amplifying equipment for commercial purposes, as well as LAMC Section 112.01 regarding radio, musical instrument, phonograph, television receiver, or other machine or device for the production, reproduction or amplification of the human voice, music, or any other sound. (Ramboll Letter, Comment 33)

In addition, this project design feature does not account for amplified noise sources that may not utilize the built-in speaker sound system for gathering spaces. What assurance is there that other such amplification systems (e.g., vendor's amplification system) would comply with the maximum allowable noise levels?

Response to Comment No. 35-110

Refer to Response to Comment No. 26-E.1-40. As discussed therein, LAMC Article 5, Section 115.02 does not apply to the Project. Furthermore, as also discussed therein, Project Design Feature NOI-PDF-4 on page IV.I-34 in Section IV.I, Noise, of the Draft EIR establishes the noise limits for any amplified sound system for outdoor gatherings on roof decks so as to not exceed the City's noise limit (i.e., an increase of 5 dBA above the ambient noise level) at any off-site noise-sensitive receptor location. Specifically, the Project Design Feature NOI-PDF-4 specifies maximum noise levels for the amplified sound

systems for outdoor gatherings on roof decks, at a reference distance, depending on where the amplified sound system is located. For example, the maximum noise level for an amplified sound system within 40 feet of the Shared Eastern Property Line would be limited to 85 dBA at a distance of 25 feet from the amplified speaker sound system. Furthermore, the Project Design Feature NOI-PDF-4 requires a qualified noise consultant to provide documentation that the design of the system complies with the maximum noise levels. The specified maximum noise levels for the amplified sound system apply to both in-house built-in systems and temporary amplified sound systems.

Comment No. 35-111

6. The Noise Model Ignores the Two New Private Streets That Would Significantly Impact Broadcast Center.

The operational noise analysis in the DEIR entirely ignores the potential noise impacts resulting from the two new private streets—a 60-foot-wide, six-lane street along the southerly boundary of the BC Site and a 30-foot-wide, four-lane street along the western boundary of the BC Site—that are roughly shown on the DEIR Conceptual Plan (DEIR, p. II-14 [Figure II-4]) and more clearly shown and described on the Vehicular Project Site Access graphic (*id.*, p. IV.K-43 [Figure IV.K-3]). While the operational noise analysis addresses, or at least purports to address, onsite stationary noise sources and offsite mobile noise sources (*id.*, pp. IV.I-43–56), it simply ignores **onsite mobile** noise sources from the movement and use of heavy trucks and other vehicles, including vehicular noise from the traffic on the two new private streets. (Ramboll Letter, Comments 38a–38b) This is an astonishing omission, particularly given that the two new streets would immediately flank Broadcast Center and Hackman has advised that both streets would include significant truck activity. Moreover, truck use would also presumably occur during nighttime production activities, as outdoor production is permitted any time and any day of the week, including weekends.

Furthermore, these onsite vehicular noise impacts from encircling Broadcast Center with roadways could be exacerbated by the construction of new buildings and parking structures along the western and southern boundaries of the Project Site and adjacent to the new private streets. To the west of the BC Site, Height Zone C permits a maximum height of 160 feet over 40% of that height zone area. (*Id.*, pp. II-18–19) As a result, one or more 160-foot-tall buildings could be constructed along the western edge of the western new private street. Similarly, to the south of the BC Site, Height Zone B permits a maximum height of 130 feet over 40% of that height zone area (*id.*, p. 19), so that one or more 130-foot-tall buildings could be constructed along the southern edge of the southern new private street. The “canyon” effect created by the presence of those potential buildings on one side of the new private streets, with the six-story Broadcast Center on the other side of them, would intensify the traffic noise generated by the new private streets and their impact on Broadcast Center residents. (Ramboll Letter, Comment 38a)

Response to Comment No. 35-111

Contrary to this comment, there are no omissions in Section IV.I, Noise, of the Draft EIR relative to onsite access and the Project does not include new private streets. Currently, the lower level of the Broadcast Center Apartments is comprised of parking with openings that face the Project Site. In addition, balconies and residential portions of the Broadcast Center Apartments located above the parking levels are set back more than approximately 20 feet from the Shared Eastern Property Line to the south and approximately 8 feet from the Shared Eastern Property Line to the west. Furthermore, as shown in Figure II-3, Key Existing Site Features, of the Draft EIR, the areas of the Project Site located to the west and south of the Broadcast Center Apartments are already used for parking and access, as well as outdoor production activities. As shown in Figure II-4, Conceptual Site Plan, and in Figure IV.K-3, Vehicle Access Plan, of the Draft EIR, the area along the Shared Eastern Property Line would continue to be separated from the Broadcast Center Apartments by mature landscaping and fencing. As also shown in these figures, the area of the Project Site to the immediate west of the Broadcast Center Apartments would continue to be used for a two-lane access aisle and parking, and the area of the Project Site to the south of the Broadcast Center Apartments would include an approximately 34-foot landscaped open space area with five drive aisles further to the south used for Project Site entry and exit that connect with the parking and circulation areas.

As stated on page IV.I-33 in Section IV.I, Noise, of the Draft EIR, the operational noise analysis was calculated using the SoundPLAN computer noise prediction model. SoundPLAN considers the specifics of land topography and sound reflections from the ground and nearby buildings for any potential “canyon effect.” Therefore, the noise analysis accounts for buildings along the Shared Eastern Property Line and includes any potential sound reflection (“canyon effect”) to the Broadcast Center Apartments. As set forth in the Draft EIR and confirmed in Response to Comment No. 26-141, noise levels associated with on-site trucks and other vehicles on-site during operations would be less than significant.

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding the truck generation estimates during Project operation.

Comment No. 35-112**7. The Noise Analysis of the Relocated Helipad Is Inadequate.**

According to the DEIR, the existing helipad use would be retained in approximately the same location, but at a higher elevation. (DEIR, p. II-15) The DEIR, without detail or justification, summarily finds that the relocated helipad’s potential noise impact would be less than significant without first establishing the existing sound levels associated with the helipad flights/use at the helipad’s current location, how those noise levels would change if

the helipad was at a higher elevation, whether the frequency and/or timing of helipad arrivals and departures would change. Given that the DEIR Conceptual Plan would significantly increase studio-related production activities, it is reasonable to assume that helipad use would correspondingly and significantly increase, but the DEIR wrongly assumes no intensification of use.

Moreover, while the DEIR states that the new helipad would be in the same approximate location, Hackman could in fact relocate the helipad anywhere on the Project Site, including a location close to Broadcast Center, that would substantially increase the helipad's noise impact on sensitive receptors.

The DEIR must be revised to establish a baseline for the existing helipad use, analyze the "maximum impact" of the new helipad and assess the need for mitigation. (Ramboll Letter, Comment 39)

Response to Comment No. 35-112

Refer to Response to Comment Nos. 16-87 and 26-15 regarding the continued operation of the helipad. As discussed therein, noise from helipad operations would be reduced compared to existing conditions.

Comment No. 35-113

8. The Noise Model Ignores Impulsive Noise Sources Which Will Significantly Impact the Surrounding Area.

The DEIR's limited consideration of studio-related production activities fails to account for the highly intrusive noise emissions unique to outdoor production activities, such as impulsive noise from staged gunshots, explosives, car crashes, wind and wave machines, sirens, flares, fireworks, crashing glass, and the construction and breakdown of sets and facades, etc. These high-energy impulsive sound sources could occur at any time and any day of the week, including weekends. These noise sources clearly present a potential nuisance value to offsite receptors and must, therefore, be considered in the analysis. Why were these obvious noise sources ignored in the DEIR? The noise model and the DEIR text need to be revised to address these noise impacts. (Ramboll Letter, Comment 38)

Response to Comment No. 35-113

Refer to Response to Comment No. 26-146 regarding the noise analysis of outdoor studio production activities. With regard to outdoor production related noise, Project Design Feature NOI-PDF-5 would continue to prohibit outdoor studio productions within 200 feet of the Shared Eastern Property Line during nighttime hours. As also discussed in

Response to Comment No. 26-146, studio production activities currently occur throughout the Project Site and would continue to occur with implementation of the Project. However, the noise levels associated with outdoor studio production would be expected to be lower than the existing conditions, due to the reduction in the outdoor area used for studio production activities. In addition, as discussed in Response to Comment No. 26-145, the Project would not involve the use of pyrotechnics as part of outdoor production activities.

Comment No. 35-114

9. The Cumulative Noise Analysis For Operational Noise in the DEIR Is Inadequate.

The DEIR concludes that cumulative impacts related to operational stationary noise sources would be less than significant because “[a]ll related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise levels.” (DEIR, p. IV.I-72)

That non-analysis is facially inadequate. The DEIR cannot make this determination based solely on a conclusory, qualitative analysis. A proper cumulative noise analysis would first calculate ambient noise conditions in the assumed future buildout year, which the noise analysis assumes is 2026, and then determine the impact of full project buildout on those ambient conditions. Furthermore, the fact that a related project may not **individually** have “excessive” exterior noise levels is irrelevant. The issue is whether the combined noise from the Project and a substantial number of related projects would **cumulatively** have significant impact. Moreover, the DEIR’s two-sentence discussion is limited to onsite stationary noise sources, while again ignoring the vehicular noise associated with onsite use of heavy trucks and other vehicles that would use the new private streets and are **mobile** noise sources. In addition, as a result of the limited operational noise impact analysis, the onsite stationary noise source cumulative impacts determination of less than significant is understated. (Ramboll Letter, Comment 37a)

In addition, the cumulative noise analysis for a Long-Term Buildout through 2043 is suspect because it ignores onsite stationery noise sources entirely and only discusses offsite mobile noise associated with ambient growth through 2043. (*Id.*, p. IV.I-78) The cumulative impacts analysis through 2043 should account for onsite and offsite noise sources.

Response to Comment No. 35-114

The commenter’s assertion that the cumulative impact analysis cannot be made in a qualitative manner is overly simplistic and not supported by CEQA, CEQA Guidelines, City policy, or case law. The Draft EIR’s cumulative noise impact analysis was prepared in

accordance with CEQA, the 2006 L.A. CEQA Thresholds Guide and the LAMC. This included evaluating the noise profile of seven related projects within 1,000 feet of the Project Site identified by the City as potentially contributing to future cumulative impacts. In evaluating cumulative operational noise, pages IV.I-69 and IV.I-70 in Section IV.I, Noise, of the Draft EIR identified the type of land use for each related project, the distance from the Project Site, and the potential for cumulative impacts based on both distance and presence of intervening buildings and structures that would attenuate noise from the Project and related projects at sensitive receptors.

Similarly, with regard to stationary source noise, the distance of related projects, presence of intervening buildings and structures, and the sources of onsite stationary source noise (e.g., rooftop mechanical equipment) were used to determine the potential for cumulative impacts. In the analysis of cumulative offsite mobile source noise, page IV.I-71 in Section IV.I, Noise, of the Draft EIR included a projection of future ambient noise levels from roadway traffic in the vicinity of the Project Site and used the traffic noise model to quantitatively determine the significance of related projects on future increases in ambient noise levels.

With respect to the cumulative impact analysis for the long-term buildout through 2043, the Draft EIR evaluated impacts associated with off-site traffic due to the potential ambient growth. Cumulative on-site noise was not evaluated quantitatively for the long-term buildout scenario, as the cumulative impacts would be similar to the cumulative impacts analyzed for 2026, as the ambient traffic growth does not affect the on-site noise sources. In summary, the Draft EIR's analysis was consistent with CEQA and City guidance on this topic, used both qualitative and quantitative methods to evaluate and disclose cumulative operational noise impacts, and found those impacts to be less than significant.

Comment No. 35-115

10. Additional Onsite Construction Noise Mitigation Measures Must Be Considered Before Rejecting the Alternative That Would Eliminate the Project's Significant Onsite Construction Noise and Vibration Impacts on Broadcast Center.

The DEIR considered but ultimately rejected "Alternatives that Eliminate the Project's On-Site Construction Noise and Vibration Impacts." (DEIR, p. V-13) According to the DEIR, in order to eliminate the Project's significant construction noise impact on Broadcast Center, construction activities would need to be moved approximately 700 feet westerly from the eastern property line of the Project Site. (*Id.*) The DEIR rejected this alternative as infeasible because it would mean that "new development could not occur over half of the Project Site." (*Id.*) Another rejected alternative would involve moving construction activities

100 feet west from Broadcast Center and erecting a 30-foot sound wall extending nearly 1,000 feet along the eastern property line of the Project Site. (*Id.*) The DEIR rejected this alternative from further consideration because it would be cost prohibitive and the wall would block views and sunlight for the west and south facing residential units during the construction period. (*Id.*) Next, with respect to onsite construction vibration, the DEIR considered moving construction activities at least 80 feet westerly from the eastern property line of the Project Site. (*Id.*) However, the DEIR rejected this third and final alternative from further consideration because it would “render a substantial portion of the Project Site undevelopable.” (*Id.*)

Measures to reduce construction noise and vibration impacts on Broadcast Center would not necessarily be infeasible. (Ramboll Letter, Comment 36a) As stated in the Ramboll Letter:

Given the lack of project-specific buildout details available at this time, the specifics around construction activities and phasing are unknown. As such, the rejection of the alternatives may be premature without further detailed considerations of construction noise planning focused on the specific buildout design. Versions of these alternatives with detailed consideration of an overall plan that includes practical measures such as imposing minimum allowable distance to the boundary for specific activities, phasing activities, employing reduced-noise equipment (for both small, powered hand tools as well as large combustion engine equipment), sequencing the use of noise barrier walls along the boundary, employing mobile noise control barriers or enclosures to shield activities, etc., may be feasible. Similar consideration applies to construction vibration mitigation. (*Id.*)

Response to Comment No. 35-115

The issues discussed in this comment are similar to those in Comment No. 26-E.1-49. Therefore, refer to Response to Comment No. 26-E.1-49.

Comment No. 35-116

11. The DEIR Conceptual Plan Does Not Reflect Nor Can It Be Verified Whether the DEIR Has Analyzed the “Maximum Impact” With Respect To Noise.

As discussed in Section II.B, *infra*, the DEIR analyses are largely based on the DEIR Conceptual Plan, the related development program in Figure II-2 and the “land use exchange,” which reflect a “hypothetical development mix... that would generate the maximum impact for that environmental issue.” (DEIR, pp. II.16–17) [sic] There is no

evidence whatsoever in the DEIR, however, that this “illustrative development scenario,” one of an infinite number of development options that the Specific Plan would permit, would generate the “maximum possible impacts.” (*Id.*, p. II-17) In particular here, it is impossible to determine whether the DEIR Conceptual Plan would generate the maximum possible noise impacts on nearby sensitive receptors, including Broadcast Center. Furthermore, there is no way to determine the worst-case impact scenario because Hackman would have an unlimited number of development options. As stated in the Ramboll Letter, “the buildout scenarios are not defined or detailed and therefore the selection of the ‘maximum impact’ scenario cannot be reviewed and confirmed.” (Ramboll Letter, Comment 28)

Response to Comment No. 35-116

The Draft EIR analyzed the Project described in Section II, Project Description, of the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-13, and 9-14 regarding how the Project Description fully complies with CEQA and the Draft EIR disclosed and analyzed all physical elements of the Project, how all plans in an EIR are inherently conceptual, the limited Land Use Exchange Program, and the regulatory process under the proposed Specific Plan. Refer to Response to Comment Nos. 26-135 and 26-138 regarding how the noise analysis is based on the Conceptual Site Plan and reflects conservative assumptions.

Comment No. 35-117

e. Construction Noise Impacts.

Onsite Construction Noise. The DEIR claims it conservatively analyzed onsite construction noise impacts when it assumed a 32-month construction schedule with overlapping construction stages. (DEIR, pp. IV.I-35, IV.I-30, n. 44) However, the construction period is **not** limited to 32 months. In fact, Hackman could extend construction over a 20-year period, until 2043. The DEIR’s arbitrary assumption that the construction period would be the minimum 32 months therefore fails to account for the potentially greater construction noise impacts associated with a much longer construction period, both as a direct result of the increased duration and likely changes in future ambient conditions. (Ramboll Letter, Comment 34)

If construction activities continued for the maximum 20-year period, the DEIR could no longer reasonably characterize the Project’s construction noise impacts as “temporary.” (DEIR, pp. IV.I-40, 42) The DEIR’s measurement of onsite construction noise is based on an hourly L_{eq} on a conservative worst day. That is reasonable for a normal construction period of two or three years. But for an extended construction period of up to 20 years, the analysis has to take account of the continuous exposure to construction noise over such a lengthy period.⁴⁸ The onsite construction noise impacts resulting from 20 years of more or

less continuous construction activity would obviously be quite significant. The noise from construction vehicles and equipment is extremely unpleasant and quite distinctive from other noise that contributes to ambient noise levels. Broadcast Center is adjacent to the Project Site, so construction noise would be particularly audible and disruptive over such an extended period.

If the preparers of the DEIR insist that the compressed 32-month timeframe is the most conservative assumption (when of course it is not), they must demonstrate that a 20-year time frame would not result in greater onsite construction noise impacts.

⁴⁸ This is consistent with the significance thresholds for construction noise, which reflect that the longer the construction period, the greater the construction noise impact. Specifically, a construction noise impact would be significant if "[c]onstruction activities lasting more than one day would exceed ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use. However, the required decibel increase for a significant impact is sharply reduced when the construction period increases to more than 10 days. In that case, the significance threshold is that a construction noise impact would be significant if "[c]onstruction activities lasting more than **10 days in a three-month period** would exceed ambient exterior sound levels by **5 dBA** (hourly L_{eq}) or more at a noise-sensitive use. While there is no significance threshold for an exceptionally long construction period, as could be the case here, the existing thresholds reflect that that longer construction periods have greater construction impacts due to their overall duration.

Response to Comment No. 35-117

The commenter conflates noise nuisance with noise impacts evaluated under CEQA. Pursuant to the 2006 L.A. CEQA Thresholds Guide guidance on the evaluation of noise impacts, the significance of construction impacts are not related to duration, but rather to maximum hourly and/or maximum daily thresholds. Refer to Response to Comment No. 26-138 for the explanation of how the 32-month schedule represents a conservative approach to determining maximum impacts.

Comment No. 35-118

In addition, Table IV.I-10 in the DEIR assumes the construction area would be would be [sic] **20 feet** from the Broadcast Center building, when in actuality the construction area of any given construction stage would almost certainly occur up to the western property line of the BC Site, which is about **seven feet** from the Broadcast Center building, a significantly shorter distance. Construction equipment would operate up to the property line to construct the private street shown in the DEIR Construction Plan, as well as construction work required to construct buildings at the western edge of that new private street, as also envisioned in the DEIR Conceptual Plan.

Therefore, the estimated construction noise impacts would be greater than disclosed in the DEIR. The DEIR must be revised to analyze the actual "maximum impact" on Broadcast Center by reducing the distance between the receptor and construction area to seven feet.

Once the actual maximum impact is analyzed, the DEIR must also meaningfully evaluate all feasible mitigation measures, even if such measures would not reduce the impact below the significance threshold. As stated above regarding Mitigation Measure NOI-MM-1, that measure is largely meaningless to Broadcast Center because there are no residential units on the ground floor of the building.

Response to Comment No. 35-118

Refer to Response to Comment No. 26-140 for a discussion of the distance between the Broadcast Center Apartments and construction activities. Refer to Response to Comment No. 26-136 regarding the construction noise impacts on the Broadcast Center Apartments and Mitigation Measure NOI-MM-1, which has been revised to require a sound barrier of 30 feet in height along the Shared Eastern Property Line to further reduce noise levels at the Broadcast Center Apartments. In addition, as discussed in Response to Comment No. 35-111, the Project does not include a new private street, as incorrectly stated by the commenter.

Comment No. 35-119

Offsite Construction Noise—Staging Areas. For offsite construction noise, the DEIR assumes temporary construction-related truck staging for haul trucks along the south side of Venice Boulevard between Cadillac Avenue and Fairfax Avenue (staging area 1) and between Normandie Avenue and Catalina Street (staging area 2). (*Id.*, p. IV.I-40) It assumes up to 25 haul trucks lined up at each of the two staging areas, with idling limited to a maximum of five minutes per the State's CARB guidelines. (*Id.*) Based on these assumptions, it concludes that noise increases at receptor locations R9 (residential, motel and medical uses on the north side of Venice Boulevard, west of Guthrie Avenue) and RIO (school and recreation uses on the north side of Venice Boulevard, east of Normandie Avenue) due to truck staging would be below the 5-dBA increase above ambient significance criterion. (*Id.*)

To start with, it is unclear how the 25 haul trucks at each staging location capture the "maximum impact" because the DEIR does not explain the basis for the 50 total haul trucks. Based on the maximum 772,000 cy of export, as well as 50,000 cy of imported fill, we reasonably assume that more than 25 haul trucks would queue and idle at the staging areas each day during the construction period. This constant parade of idling haul trucks for an undetermined number of hours and days when hauling activities are ongoing would occur within feet of the sensitive receptors at much longer durations and higher intensity and frequency than assumed in the DEIR.

Response to Comment No. 35-119

Refer to Response to Comment No. 26-24. As discussed therein, off-site staging is no longer proposed, and all construction haul trucks would stage on-site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 35-120

Offsite Construction Noise—Haul Routes. For offsite construction noise related to haul routes, the DEIR assumes construction haul trucks would travel between the Project Site and I-10 via Washington Boulevard, Fairfax Avenue, San Vicente Boulevard, Beverly Boulevard, Normandie Avenue, and Vermont Avenue to access the staging area from I-10. (*Id.*, p. IV.I-41) The estimated number of trucks for each stage of construction is based on the CalEEMod inputs in Appendix B to the DEIR, which purports to assume the minimum 32-month buildout of the DEIR Conceptual Plan. The increases in ambient sound levels due to offsite noise are underestimated because the existing ambient conditions are not based on the quietest time of day or week, as further detailed above regarding the DEIR's erroneous ambient noise monitoring methodology. As a result, the actual increases in the existing ambient noise levels resulting from haul-and construction-related truck trips are unknown and should be reanalyzed against a corrected baseline. (Ramboll Letter, Comment 35)

Offsite Construction Noise—Construction-Related Truck Trips. This analysis references Section IV.K (Transportation) of the DEIR, stating that the peak period of construction with the highest number of construction trucks would occur during the mat foundation stage.⁴⁹ (*Id.*, p. IV.I-41) This reference is incorrect. The Transportation Chapter of the DEIR does not address construction-related trips at all. The relevant information is actually buried in the CalEEMod inputs in Appendix B to the DEIR (*i.e.*, the Air Quality Report). It assumes that 500 concrete trucks would be required during the mat foundation stage, for a total of 1,000 truck trips per day for five consecutive days. This is a significant number of trips, but there is no evidence that this is the “maximum impact.” Do the 500 concrete trucks and 1,000 truck trips per day for five consecutive days accurately reflect a single concrete pour for the mat foundation for all of the buildings on the Project Site and is this a worst case? The DEIR does not explain the basis for its mat foundation assumptions, including the notion that there would only be one mat foundation. If the DEIR claims that this is the most conservative assumption, it must provide sufficient information demonstrating that is the case. Moreover, the DEIR analysis only relates to the alleged maximum impact from buildout under the DEIR Conceptual Plan, one of an unlimited number of development options. Hackman could easily choose a different development scenario that would substantially increase the Project's offsite construction noise impact, for example by constructing separate mat foundations for series of buildings and structures in close proximity to the Project Site an extending such construction over a Long-Term Buildout.

⁴⁹ The DEIR assumed a single mat foundation (concrete pour) stage for the construction of the entire Project, which appears nonsensical for buildout under the DEIR Conceptual Plan or otherwise.

Response to Comment No. 35-120

Refer to Response to Comment Nos. 26-E.1-5 and 26-E.1-43 regarding the baseline ambient noise levels.

Noise impacts associated with off-site construction were analyzed in the Draft EIR (see Table IV.I-11), which was based on the anticipated maximum number of construction truck trips per day. Refer to Appendix FEIR-8 (Details of Project Buildout and Construction Activities) of this Final EIR for a summary of construction assumptions. As discussed in the Draft EIR, construction noise impacts are evaluated based on the maximum number of truck trips per hour. As analyzed in the Draft EIR and further discussed in Appendix FEIR-8 of this Final EIR, the Project may require mat foundations for some of the proposed structures, which would require up to approximately 500 concrete deliveries (500 truck trips in and 500 truck trips out). These types of concrete pours would be limited to approximately five large pours. Therefore, the noise impacts analyzed in the Draft EIR represent the maximum noise impacts.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Project that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan.

Comment No. 35-121

f. Construction Ground-Borne Vibration and Noise Impacts.

Human Annoyance Vibration Impacts from Onsite Construction. For human annoyance vibration impacts from onsite construction, the DEIR applies the 72 VdB significance criterion to Broadcast Center, which is the threshold used for residential receptors. (*Id.*, p. IV.I-63) It concludes that ground-borne vibration levels at Broadcast Center would exceed the threshold if the heavy construction equipment would operate less than 80 feet from the receptor.

Table IV.I-21 in the DEIR assumes the construction equipment would be **20 feet** from the Broadcast Center building, when in actuality equipment would almost certainly operate up to the western property line of the BC Site, which is about **seven feet** from the Broadcast Center building, a significantly shorter distance. Construction equipment would operate up to the property line to construct the private street shown in the DEIR Construction Plan, as well as construction work required to construct buildings at the western edge of that new private street, as also envisioned in the DEIR Conceptual Plan.

Therefore the estimated construction vibration impacts with respect to human annoyance would be greater than disclosed in the DEIR. Moreover, the DEIR concludes that mitigation measures considered to reduce vibration impacts from onsite construction with respect to human annoyance such as a wave barrier, were infeasible, so that vibration impacts from onsite construction with respect to human annoyance would be significant and unavoidable. (*Id.*, pp. IV.I-66–67) As a result, not only were the vibration impacts on Broadcast Center understated, but apparently the DEIR claims there are no feasible mitigation measures that could at least reduce disturbance to the residents. The DEIR must be revised to analyze the “maximum impact” on Broadcast Center by reducing the distance between the receptor and construction equipment to seven feet.

Response to Comment No. 35-121

Refer to Response to Comment No. 26-140 for a comprehensive explanation of the construction noise analysis that was conducted at the Broadcast Center Apartments, including the distance between the Broadcast Center Apartments and construction activities. Similar to noise, vibration impacts were analyzed with the same distance to represent worst-case condition. As noted in Table IV.I-21 on page IV.I-64 of the Draft EIR, vibration impacts associated with human annoyance impacts would be potentially significant at the Broadcast Center Apartments. As discussed in Response to Comment No. 26-E.1-49, a wave barrier was deemed infeasible; therefore, these impacts would be significant and unavoidable.

As discussed in Response to Comment No. 35-111, the Project does not include a new private street, as incorrectly stated by the commenter.

Comment No. 35-122

Once the actual maximum impact is analyzed, the DEIR must also meaningfully evaluate all feasible mitigation measures, even if such measures would not reduce the impact below the significance threshold. (Ramboll Letter, Comment 44a [“The effectiveness and reasonableness of a temporary construction noise barrier to reduce construction noise impacts at the apartment building should be determined based on the specific construction to occur along that boundary”]; see *also id.*, Comment 36a [“While measures to reduce construction noise impacts on the apartment building along the east boundary would be challenging, they would not necessarily be infeasible... detailed consideration an overall plan that includes practical measures such as imposing minimum allowable distance to the boundary for specific activities, phasing activities, employing reduced-noise equipment (for both small, powered hand tools as well as large combustion engine equipment), sequencing the use of noise barrier walls along the boundary, employing mobile noise control barriers or enclosures to shield activities, etc., may be feasible.”])

Response to Comment No. 35-122

Refer to Response to Comment Nos. 26-136 and 26-137 for the discussion of additional measures that would reduce the construction noise impacts.

Comment No. 35-123

In addition, if construction activities continued for the maximum 20-year period, the significant and unavoidable construction vibration impact on Broadcast Center would no longer be “temporary.” The vibration impact resulting from 20 years of more or less continuous activity would be extremely unpleasant and disruptive to Broadcast Center residents. How would Hackman manage the community impacts? Which, again, could persist for up to 240 months. Consistent with the Ram boll Letter, has Hackman considered implementing a construction noise management plan to facilitate communication with neighboring stakeholders to address construction-related noise complaints? (Ram boll Letter, Comment 36) If the preparers of the DEIR insist that the compressed 32-month timeframe is the most conservative assumption, they must demonstrate that a 20-year time frame would not result in a greater construction vibration impact on Broadcast Center.

Response to Comment No. 35-123

Refer to Response to Comment No. 26-138 regarding the construction noise analysis, the 32-month construction schedule, and long-term buildout scenario. With respect to the commenter’s suggestion of a noise management plan, refer to Response to Comment No. 26-137 for revisions to Project Design Feature NOI-PDF-1, which include establishment of a telephone hot-line for use by the public to report any adverse noise complaints associated with the construction of the Project. Also note that with regard to vibration, as discussed on page V-13 in Section V, Alternatives, of the Draft EIR, the vibration impacts related to construction would be reduced to a less than significant level when heavy construction equipment is located more than 80 feet from the sensitive receptor. As such, the vibration impacts would indeed be short-term and only related to the timeframe when construction immediately adjacent to the sensitive receptor occurs.

Comment No. 35-124

Building Damage and Human Annoyance Vibration Impact From Offsite Construction. For building damage and human annoyance vibration impacts from offsite construction, the DEIR analyzes the impacts to existing buildings along the Project’s anticipated haul routes from construction delivery and haul trucks and found the impact would be significant and unavoidable. (*Id.*, p. IV.I-65) The DEIR, however, attempts to minimize the importance of this impact by a statement that it would be “temporary and intermittent.” (*Id.*) This again reflects that the noise analyses assume the minimum 32-month construction, when in fact

construction could continue for 20 years, to 2043. The DEIR fails to address what this protracted exposure to vibration impacts could mean for the offsite receptors along the anticipated haul routes, or even acknowledge that these impacts could be far more than “temporary.”

Response to Comment No. 35-124

The duration of off-site construction activities (e.g., haul trucks on local roads) does not affect the significance of vibration impacts on building damage and human annoyance. As summarized in Table IV.I-1 of the Draft EIR, the criteria for evaluating the impact of groundborne vibration on buildings is based on peak particle velocity, which is defined as “the maximum instantaneous peak of the vibration signal in inches per second” (page IV.I-9). The Draft EIR also relies on FTA’s guidance on how human annoyance impacts are to be analyzed (page IV.I-31). FTA recommends that impacts be judged based on the decibel notation (VdB) variable, which expresses the amplitude of vibration of vibration and its effects on the human body. This factor is not a function of duration, but of the peak strength of vibration.

As such, any exceedance of thresholds for building damage and human annoyance would be considered significant regardless of the duration or frequency of exceedances. However, as provided in the Draft EIR (page IV.I-65), vibration impacts associated with building damage along the haul routes would be less than significant. Put another way, a longer period of impacts associated with a 20-year buildout would not change the finding that impacts would be considered significant.

Comment No. 35-125

g. Operational Noise Impacts.

The DEIR uses the SoundPLAN (version 8.2) computer noise prediction model to calculate the Project’s noise impact with respect to onsite stationary noise sources. (*Id.*, IV.I-32) With this software, the user selects the project-specific data inputs and SoundPlan produces the automated noise modeling prediction algorithm and results for the project.⁵⁰

Mechanical Equipment. For mechanical equipment, the DEIR assumes that project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA and the Project would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. (*Id.*, p. IV-I.43) [sic]

The DEIR, however, does not provide the equipment location, type, size, operation, etc. that is necessary to verify whether the “maximum possible impact” was analyzed. For example, with respect to Broadcast Center, what did the preparers of the DEIR input in the SoundPlan for proximity to the building and how many and what size equipment would be installed on the adjacent rooftop(s)? Would screening effectively reduce noise impacts to comply with LAMC Section 112.02 under a worst-case scenario analysis? There is simply not enough information in the DEIR to make this determination. (Ramboll Letter, Comment 37) In fact, the SoundPlan noise modelling information, specifically the mechanical equipment sound level data, assumes a simple point source with a sound power level of 90 dBA for all mechanical equipment (heating, ventilating, air-conditioning, etc.). Therefore, offsite project sound levels and the associated impacts are underestimated. (Ramboll Letter, Comment 45)

Moreover, as discussed above, the potential noise level increase due to the proposed mechanical equipment would be underestimated because the noise monitoring was conducted between the hours of 10:00 P.M. and 1:00 A.M. on a weekday (Monday into Tuesday), which is not the quietest time of the day when people are the most sensitive to noise. As such, the ambient noise levels must be reanalyzed in accordance with industry standards, so operational (and construction) noise levels can be appropriately measured against the correct baseline. (Ramboll Letter, Comment 40)

⁵⁰ See SoundPlan noise 8.2. Available at: <https://soundplan-uk.com/soundplan-noise-8-0/> Accessed: August 2022. See also SoundPLANnoise Contents of the Individual Modules, June 2020. Available at: <https://soundplan-uk.com/wp-content/uploads/2020/08/SoundPLAN-Module-Description-SP-EU-June-2020.pdf>. Accessed: August 2022.

Response to Comment No. 35-125

Refer to Response to Comment Nos. 26-135 and 26-E.1-57 for a discussion of how rooftop mechanical equipment was analyzed in the Draft EIR. In addition, the noise model for the rooftop mechanical equipment is based on typical HVAC equipment sound levels, as the detailed design of the individual building mechanical design is not available at this stage of the Project (detailed individual building plans are prepared during the regulatory building permit phase after a project is approved). Stationary noise sources, including mechanical equipment, are typically calculated based on a point source, representing each piece of mechanical equipment (e.g., an air-handling unit or an exhaust fan). Furthermore, as stated on page IV.I-43 of the Draft EIR, the Project mechanical equipment would be required to comply with LAMC Section 112.02, so as not to exceed the ambient noise level by more than 5 dBA.

Refer to Response to Comment No. 26-E.1-5 above regarding how the existing ambient noise levels have been properly identified in accordance with applicable LAMC requirements.

Comment No. 35-126

Outdoor Studio Production Activities. With regard to outdoor studio production activities, which could include, without limitation, the construction and breakdown of sets, outdoor filming and the use of portable generators, the DEIR assumes that outdoor production activities would continue to be prohibited within 200 feet of the BC Site and could occur any time and any day of the week, including weekends. (*Id.*, pp. IV.I-44–45) It also assumes that, because the overall amount of outdoor area used for studio production activities during project operation would be reduced as compared to existing conditions due to the development of new building and parking facilities, the operational noise level associated with outdoor production activities would be less than the existing condition. (*Id.*, p. IV.I-45)

These assumptions are extremely unpersuasive, for many reasons. First, the conclusory statement that the outdoor areas would be reduced as compared to the existing outdoor areas, and noise levels from outdoor production would therefore be somewhat lower, is unsupported, demonstrably untrue and contradicts numerous statements in the DEIR. To begin with, the square footages of the existing and proposed outdoor areas are not clearly identified in the DEIR, so it is impossible to verify the DEIR's assumption. In any event, even with the limited information in the DEIR, it appears the stated assumption is false. The Project would apparently include two production levels, one at-grade and the second below-grade, both of which could cover the entire Project Site. The DEIR does not disclose any details regarding the potential production levels (even in the DEIR Conceptual Plan), but they would presumably include unenclosed areas from which noise would emanate.

Furthermore, the DEIR's conclusory assumption ignores that even if the amount of available outdoor area is reduced, the **frequency** of outdoor production activities would certainly increase because the development of the Project would significantly increase the overall studio production activity at the Project Site, including outdoor production activity. If the available outdoor areas are used more frequently for outdoor production activities, noise from those activities could be substantially more impactful on Broadcast Center and other sensitive receptors than existing outdoor activities. The reader has no idea, however, because the DEIR substitutes an unsupported assumption in lieu of facts and analysis.

Moreover, the DEIR states that Hackman has the flexibility to expand the potential outdoor areas available for production activities by converting surface parking areas to production space and "temporarily" relocating the parking to offsite locations. (DEIR, p. II-30) Therefore, the amount of outdoor production space could be greater than assumed in the DEIR.

Response to Comment No. 35-126

As discussed in Response to Comment No. 26-140, when compared with existing conditions, outdoor production areas would be reduced with the Project due to the introduction of new buildings. As such, noise impacts associated with outdoor studio production activities would be less than significant. Also refer to Response to Comment No. 26-146 for a quantitative analysis that confirms this conclusion. In addition, Project Design Feature NOI-PDF-5 would continue to prohibit outdoor studio production activities within 200 feet of the Shared Eastern Property Line during nighttime hours. With regard to the comment about frequency of use of outdoor production facilities, note that CEQA noise impacts are not based on frequency. Furthermore, the confirmatory quantitative noise analysis discussed in Response to Comment No. 26-146 assumed full operation of the outdoor production areas. Also note that off-site parking is no longer proposed as part of the Project.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project in accordance with CEQA.

Comment No. 35-127

Equally important, the DEIR's assumption is apparently based on the DEIR Conceptual Plan. Again, however, that is only one illustrative development scenario and, with respect to noise from outdoor production activities, clearly does not reflect anything close to a worst-case scenario with "maximum possible impacts." There is nothing to stop Hackman from increasing the amount of outdoor production spaces. There is nothing to prevent Hackman from developing outdoor production space adjacent to Broadcast Center and/or Farmers Market. There is nothing to impede Hackman from developing uses, whether production-related or not, that have unenclosed space and would generate considerably more onsite operational noise than the implementation of the illustrative DEIR Conceptual Plan.

In addition, while Project Design Feature NOI-PDF-5 limits studio-related production activities to no closer than 200 feet from the BC Site during nighttime hours, there is no evidence or analysis in the DEIR which demonstrates that this buffer area would be effective. The DEIR does not define "outdoor studio production activities" in NOI-PDF-5, so it is not clear what activities would or would not be allowed within the 200-foot buffer. (Ramboll Letter, Comment 42) In any event, a 200-foot buffer area would be wholly inadequate to mitigate the Project's operational noise impact from outdoor production activities. In particular, impulsive noises associated with outdoor filming can be highly intrusive to residents and other sensitive uses at distances that far exceed 200 feet.

Furthermore, Project Design Feature NOI-PDF-5 is not a project design feature; rather, it is a mitigation measure to try and mitigate the Project's noise impact from outdoor production activities on Broadcast Center residents. However, actual analysis is required in the DEIR to determine the extent to which this mitigation measure would be effective. (Ramboll Letter, Comment 42)

The DEIR ignores that its purpose is to analyze the environmental impacts of the Project on the existing environment. The Specific Plan would permit and expand outdoor studio production activities for decades to come with limited restrictions. The DEIR must actually analyze those impacts and identify all required and feasible mitigation measures to diminish those impacts. The DEIR's reliance on a conclusory and inaccurate statements is wholly inadequate under CEQA.

Response to Comment No. 35-127

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Project that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five studio uses that would be permitted under the Specific Plan. Outdoor production activities are described on pages IV.I-44 to IV.I-45 in Section IV.I, Noise, of the Draft EIR. In addition, refer to Response to Comment No. 26-146 for typical noise sources associated with outdoor studio production activities.

Refer to Response to Comment No. 26-135 for the response to the assumption used in the noise analysis including the PDFs. Refer to Response to Comment No. 9-34 regarding the difference between PDFs and mitigation measures. Refer to Response to Comment No. 26-146 regarding the noise analysis associated with outdoor studio production.

Also note that Project Design Feature NOI-PDF-5 represents the continuance of an existing restriction to prohibit outdoor studio production activities within 200 feet of the Shared Eastern Property Line during nighttime hours. As explained on pages IV.I-44 to IV.I-45 of the Draft EIR, outdoor production activities include the construction and breakdown of sets, outdoor filming, etc. As provided in Response to Comment No. 26-145, the Project would not involve the use of pyrotechnics outdoors.

Comment No. 35-128

Outdoor Roof Deck Gathering Spaces. The DEIR assumes that up to 1,200 people could gather at a given roof deck location, with a total of 5,000 people throughout the Project Site at any given time during the hours of operation within the potential outdoor gathering areas. (*Id.*) The DEIR states this is a conservative assumption based on the

DEIR Conceptual Plan. (DEIR, p. IV.I-45, n. 53) The hours of operation are assumed to be 7:00 A.M. to 12:00 A.M. (*Id.*, p. IV.I-45) The DEIR claims that the outdoor roof deck gathering areas would be designed per NOI-PDF-4 to maintain noise levels to specified levels at each property boundary, which would ensure that any amplified sound system would not exceed the significance criterion at any offsite noise-sensitive receptor location. (*Id.*, pp. IV.I-45–46)

However, actual development would not be governed by the illustrative DEIR Conceptual Plan. As is the case for impact analyses throughout the DEIR, the DEIR includes no evidence or explanation that the DEIR Conceptual Plan would generate the “maximum possible impact” with respect to outdoor roof deck gathering spaces. Furthermore, the DEIR does not provide the necessary detail from the SoundPlan in Appendix J to the DEIR to verify whether the “maximum impact” was analyzed. (Ramboll Letter, Comment 46) It is possible Hackman could decide to place multiple rooftop gathering spaces 30 feet from the BC Site, with clear line of sight to Broadcast Center, rather than spreading them across the Project Site, as the DEIR apparently assumes. (*Id.*, p. IV.I-45, n. 53)

Moreover, the DEIR’s recommended amplified-sound mitigation is inadequate, as previously discussed. Project Design Feature NOI-PDF-4 must be revised to strictly comply with the regulatory requirements in LAMC Sections 115.02(f) and 112.01(b). In addition, how does this project design feature and the noise analysis account for the combined or composite noise level resulting from people talking and amplified sound occurring together on outdoor roof deck gathering spaces?

Response to Comment No. 35-128

Refer to Response to Comment No. 26-135 for a detailed discussion of the less-than-significant impacts associated with outdoor roof deck gathering spaces, including the conservative assumptions regarding the maximum number of occupants at the outdoor roof deck areas. Refer to Response to Comment No. 26-E.1-40 regarding the applicable LAMC noise regulations related to amplified sound systems that are incorporated into Project Design Feature NOI-PDF-4.

With respect to the comment regarding the composite noise level from people talking and amplified sound, Table IV.I-13 in Section IV.I, Noise, of the Draft EIR provides the estimated composite noise levels from the outdoor uses, including amplified sound. As shown therein, noise levels from these noise sources would be below the significance criteria and noise impacts would be less than significant.

This comment incorrectly refers to the PDF as mitigation. Refer to Response to Comment No. 9-34 regarding the difference between PDFs and mitigation measures. The

Draft EIR concluded that noise impacts would be less than significant during operation, and no mitigation is required.

Comment No. 35-129

Parking Facilities. The DEIR's operational noise analysis assumes that, consistent with the DEIR Conceptual Plan, the Project would include approximately 5,300 vehicular parking spaces, which would be located within an underground parking level, an above-ground parking structure (located at the southeastern portion of the Project Site) and/or surface parking throughout the Project Site. (*Id.*, p. IV.I-46) It further assumes that the underground parking "levels" (which contradicts its statement in the preceding sentence that there would be a single underground parking level) would be fully enclosed on all sides and therefore noise would be shielded from offsite sensitive receptors. (*Id.*) The estimated noise levels from at-grade and above-grade parking levels are collectively estimated in Table IV.I-14, with no distinction between noise levels caused by the two types of parking.

Again, the DEIR does not provide the necessary detail in Appendix J to the DEIR to verify whether the "maximum impact" was analyzed. The distance to sensitive receptors, the type of parking (at-grade versus above-grade), and the size of the parking operation assumed are not disclosed in the DEIR. As such, the DEIR fails to demonstrate that it has in fact studied a worst-case scenario for parking noise.

More specifically, assuming that the DEIR Conceptual Plan actually reflects the maximum possible impact regarding operational noise associated with onsite vehicular parking, Appendix J to the DEIR lacks sufficient information to show how the analysis was done. The distance to sensitive receptors, the type of parking (at-grade versus above-grade), and the size of the parking operation assumed are not disclosed in the DEIR. As such, the DEIR fails to demonstrate that it has in fact studied a worst-case scenario.

Furthermore, the noise analysis looks in isolation at the parking noise impact instead of collectively analyzing the combined onsite mobile noise impacts from at- and above-grade parking and the traffic on the two new private streets. This is a significant omission, particularly because the DEIR Conceptual Plan reflects an above-grade parking structure and both new private streets sited adjacent to or in close proximity to Broadcast Center.

In any event, the DEIR Conceptual Plan does not reflect the maximum possible impact as there is nothing to prevent Hackman from developing a second above-grade parking structure (in lieu of the illustrative subterranean parking structure reflected in the DEIR Conceptual Plan) adjacent to the new western private street, 30 feet from Broadcast Center. In that case, there would be two new private streets and two new above-grade parking structures flanking both the western and southern boundaries of the BC Site. This would clearly generate considerably more onsite operational noise than the implementation

of the illustrative DEIR Conceptual Plan. Similarly, there is nothing to prohibit Hackman from placing the Mobility Hub or an outdoor production activity area adjacent to the new western private street with a similar result.

Response to Comment No. 35-129

Refer to Response to Comment No. 26-135 regarding the detailed analysis of noise associated with proposed on-site parking.

As described on page IV.K-44 in Section IV.K, Transportation, of the Draft EIR and discussed in Topical Response No. 7, Mobility Hub, the Mobility Hub would provide access for passenger pick-up/drop-off zones, including shuttle buses. The Mobility Hub would be located at the southwest corner of the Project Site with access from Fairfax Avenue. The Mobility Hub would be shielded along the north and east by new structures and an approximately 12-foot-high wall along the southern property line. Noise levels associated with the Mobility Hub would include vehicles and shuttle buses for drop off and pick up. Based on the Project transportation analysis and shown in Appendix FEIR-16 of this Final EIR, there would be up to approximately 52 shuttle buses (104 shuttle bus trips per day), approximately 149 rideshare vehicles (298 rideshare trips (e.g., Uber/Lyft), and approximately 149 pick-up/drop-off private vehicles (298 private vehicle trips per day). Table II-30 on page II-1402 provides the estimated noise levels associated with the Project's Mobility Hub. As shown in Table II-30, noise from the Project's Mobility Hub would be well below the existing daytime and nighttime ambient noise levels (minimum 25 dBA below) and would not increase the existing daytime and nighttime ambient noise levels. As such, noise impacts associated with the Mobility Hub would be less than significant. Furthermore, noise impacts associated with the Mobility Hub would be consistent with the Draft EIR's analysis, and the Mobility Hub does not have any unique noise characteristic different than circulation areas and parking noise analysis. Nevertheless, a confirmatory noise analysis of the Mobility Hub was conducted in response to this comment, which confirms the Draft EIR's conclusion that noise impacts, including noise from the Mobility Hub, during Project operation would be less than significant. With regard to the Mobility Hub being constructed in a different location, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 26-135, future changes that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review.

Also refer to Response to Comment No. 26-143 regarding composite noise levels.

**Table II-30
Mobility Hub Operation Noise Levels**

Off-Site Receptor Location	Estimated Noise Levels due to Mobility Hub, dBA (L _{eq})		Existing Daytime Ambient Noise Levels, dBA (L _{eq})		Ambient + Project Noise Levels, dBA (L _{eq})		Noise Increase due to Project, dBA (L _{eq})	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	1.7	0.0	61.1	53.3	61.1	53.3	0.0	0.0
R2	0.0	0.0	62.8	60.7	62.8	60.7	0.0	0.0
R3	3.1	0.0	68.5	67.5	68.5	67.5	0.0	0.0
R4	0.0	0.0	67.7	65.8	67.7	65.8	0.0	0.0
R5	10.6	5.5	58.9	57.8	58.9	57.8	0.0	0.0
R6	9.0	3.9	60.4	54.2	60.4	54.2	0.0	0.0
R7	23.5	18.4	56.6	53.1	56.6	53.1	0.0	0.0
R8	41.9	36.9	66.9	65.0	66.9	65.0	0.0	0.0
R9 (Gilmore Adobe) ^a	13.5	8.4	56.0	52.1	56.0	52.1	0.0	0.0

^a The Gilmore Adobe (also referred to as the Rancho La Brea Adobe) is a commercial use, and the Draft EIR correctly analyzed the Gilmore Adobe as a commercial use. This is verified by the 2018 book, *A Family Vision – Spanning Three Centuries – The History of the A.F. Gilmore Company*, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project. A commercial use is not a sensitive receptor for purposes of the noise analysis under CEQA. Nonetheless, even if the Gilmore Adobe were treated hypothetically as a residential use, potential noise impacts associated with the Mobility Hub at the Gilmore Adobe would be less than significant.

Source: AES, 2023

Comment No. 35-130

Loading Dock and Trash Collection. For loading dock and trash collection areas, the DEIR assumes that they would be located throughout the Project Site in support of the production activities. (DEIR, pp. IV.I-46–47) The Project also includes various outdoor truck loading areas to serve the basecamp areas and sound stages that would be located at the basecamp areas or adjacent to the sound stages. (*Id.*, p. IV.I-47) The estimated noise levels were calculated with the assumption that up to 60 truck loadings and two trash compactors would operate concurrently to represent a conservative noise analysis. (*Id.*) The DEIR further assumes that noise levels associated with loading activities would be consistent with the existing loading operations because the loading activities would be located at similar distances from the offsite receptors. (*Id.*)

The DEIR yet again fails to provide the necessary detail in Appendix J to the DEIR to verify whether the “maximum possible impact” was analyzed. Do 60 trucks loading and two trash compactors operating concurrently reflect the most conservative assumption? What is the basis for these operational inputs? Because we do not know the distances assumed from

the sensitive receptors, we do not know whether it is the most conservative analysis with respect to Broadcast Center or another offsite receptor. Moreover, the DEIR cannot assume that the loading areas would be sited at similar distances from offsite receptors because the DEIR Conceptual Plan “illustrates one possible development scenario” and the actual development would be governed by the Specific Plan. Hackman could decide, for example, to place more loading areas in close proximity to Broadcast Center.

Response to Comment No. 35-130

Refer to Response to Comment No. 26-135 for a detailed discussion of the loading dock analysis included in the Draft EIR and Response to Comment No. 26-E.1-58 for detailed discussion of the noise calculation worksheets, including assumptions for the loading docks and trash compactors. As discussed in the Draft EIR (page IV.I-47), the noise analysis assumed that up to 60 truck loadings and two trash compactors would operate concurrently to represent a conservative noise analysis. As also discussed in the Draft EIR (page IV.I-46), trash compactors would be located inside the subterranean parking facilities or within another structurally-enclosed area, which would be shielded from the off-site noise sensitive receptors. Based on the Project truck trips forecasts, there would be approximately 83 trucks per day during operation of the Project.¹⁴⁴ In addition, truck trips would be dispersed throughout the day and would not be expected to concentrate in any particular hour. Therefore, the assumed 60 truck loadings simultaneously is a conservative assumption, as there would only be approximately 83 trucks on-site per day. Refer to Response to Comment Nos. 26-135 and 26-138 regarding how the noise analysis is based on the Conceptual Site Plan and reflects conservative assumptions. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan.

Comment No. 35-131

Offsite Mobile Noise. The DEIR analyzes 18 roadway segments in the project vicinity (DEIR, p. IV.I-48), assuming a net increase of 787 and 855 trips during the morning and afternoon peak hours, and that automobiles, as opposed to medium or heavy trucks, would comprise the majority (97%) of the trips (*id.*, Appendix J, pp. 210–213). The DEIR claims the calculated CNEL levels are conservative because the noise levels experienced along the roadways do not account for the presence of any physical sound barriers or intervening structures. (*Id.*, p. IV.I-48)

¹⁴⁴ Gibson Transportation Consulting, Inc., Truck Trips Forecasts for the TVC 2050 Project, Los Angeles, California, Memo dated March 8, 2023.

The DEIR does not expand on its assumptions around vehicle type, so the reader cannot verify whether the distribution assumption regarding 97% auto, 2% medium truck, and 1% heavy truck for average daily trips reflects the “maximum possible impact” from offsite mobile noise. In addition, the truck assumptions applied in the noise analysis are inconsistent with the assumptions used in the air quality analysis of the DEIR. The CalEEMod assumptions in the Air Quality Report show approximately 559 one day trips or 279 round trips per day during operations, far greater than 3% of 787 or 855 trips. (Air Quality Report, pp. 102 and 103 of PDF). Moreover, under the DEIR Conceptual Plan, Broadcast Center would be surrounded on all four sides by public and private streets, so residents would be acutely affected by mobile noise impacts, but, as previously discussed, the DEIR simply ignores the noise impact associated with the two new private streets.

Response to Comment No. 35-131

The percentage of trucks for the off-site transportation noise analysis is provided in Table IV.I-7 of the Draft EIR. The analysis assumed that truck trips would represent 3 percent of total vehicle trips accessing the Project Site, which is a conservative assumption, as the actual trucks would be less than 3 percent. Please refer to Response to Comment No. 26-141 for detailed information associated with the Project truck percentages. As provided on page IV.I-49 in Section IV.I, Noise, of the Draft EIR, the Project would result in a maximum noise increase of 1.0 dBA (CNEL) in vehicle-related noise along The Grove Drive. The estimated maximum noise levels increase along Beverly Boulevard and Fairfax Avenue would be 0.3 dBA (CNEL) and 0.2 dBA (CNEL), respectively. As concluded on page IV.I-54 in Section IV.I, Noise, of the Draft EIR, noise impacts associated with off-site vehicles would be less than significant. As discussed in Response to Comment No. 35-111, the Project does not include any new private streets. Please refer to Response to Comment No. 26-141 for additional noise analysis associated with on-site vehicles.

Regarding the truck trips cited in the commenter’s Air Quality Report, please refer to Response to Comment No. 26.E.1-16. As explained therein, the CalEEMod model is designed for calculation of regional emissions and not for the purpose the commenter is trying to use it for (developing a localized fleet mix). It is fundamentally flawed to apply a regional fleet mix designed for all land uses within the region to represent a single project.

Comment No. 35-132**P. The DEIR's Analysis of the Project's Public Services Impacts Is Inadequate.****1. The DEIR's Analysis of Fire Protection Impacts Is Inadequate.**

The DEIR did not adequately analyze the Project's potential to result in substantial adverse physical impacts associated with the provision of or need for new or physically altered fire protection facilities.

According to threshold (a) from Appendix G to the Guidelines, the DEIR must analyze whether the Project would result in physical impacts associated with the need for new fire protection facilities in order to "maintain acceptable service ratios, response times or other performance objectives for fire protection services." As the DEIR acknowledges, "[b]ased on the LAMC criteria regarding response distance, the Project Site would be located outside of the required 1.0-mile response distance from a fire station with an engine company." (DEIR, p. IV.J.1-23) And, as calculated in the DEIR, "the Project would result in an estimated net increase of 5,702 employees on-site." (*Id.*, p. IV.J.2-15) Therefore, the DEIR admits that the Project would result in a sizeable population of workers whose place of employment would be located well outside of the fire protection facility response distance required by the LAMC.

Indeed, according to the Los Angeles Fire Department Response Letter (the "Fire Letter"), included as Appendix K to the DEIR, "[b]ased on these criteria (response distance from existing fire stations), fire protection would be considered **Inadequate**." (DEIR, Appendix K, p. 3, emphasis in original) This directly contradicts the DEIR's determination that the Project's "impacts with regard to LAFD facilities and equipment would be less than significant." (*Id.*, p. IV.J-25)

The Fire Letter went on to provide a list of standards, only some of which are connected to enforceable regulatory requirements. The Fire Letter then stated that "[t]he inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level." (*Id.*, p. 6) However, the DEIR does not include any project design feature or mitigation measure to address the Fire Letter's "recommendations." Nevertheless, the DEIR concludes that "compliance with LAFD procedures and Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and, therefore, reduce the need for a new fire station or the expansion, consolidation, or relocation of an existing fire station." (*Id.*, p. IV.J.1-25) While compliance with regulatory requirements may reduce the potential for incidents, it does not address the recommendations in the Fire Letter that LAFD indicated are necessary to mitigate a significant impact on fire protection services. Moreover, the DEIR makes no attempt to explain how adherence to these

recommendations would excuse compliance with the regulatory requirement to have a fire station with an engine company within a 1.0 mile response distance.

Nor does the DEIR directly dispute that the Project may result in the need for new or enhanced fire protection facilities. Instead, the DEIR merely states that “if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would be addressed, as necessary.” (*Id.*) This disregards the CEQA obligation to analyze the potential environmental impacts of a new facility at the time that the need is created by a project.

The cumulative impacts analysis regarding the need for new fire protection facilities is also inadequate. As plainly stated in the Fire Letter, “[t]he development of this proposed project, along with other approved and planned projects in the immediate area, may [cumulatively] result in the need for the following: 1. Increased staffing for existing facilities. (I.E., Paramedic Rescue Ambulance and EMT Rescue Ambulance resources.) 2. Additional fire protection facilities. 3. Relocation of present fire protection facilities.” (*Id.*, Appendix K, p. 6) Nonetheless, the DEIR makes no attempt to analyze the potential environmental impacts associated with the cumulative need provide increased staffing and additional facilities, and relocate existing facilities.

After explicitly acknowledging, and without addressing, LAFD’s declared resource needs for additional staffing and facilities, the DEIR generically states that “over time, LAFD will continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.” (*Id.*, p. IV.J-29) Because LAFD has already identified these cumulative resource needs, the DEIR should have studied the potential cumulative impacts resulting from new fire protection facilities.

Instead of studying the potential environmental impacts associated with needed fire protection facilities, the DEIR again defers the analysis. In order to justify the impermissible deferral of analysis, the DEIR claims that

if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and would not be expected to result in significant impacts. (*Id.*, p. IV.J.1-30)

However, the DEIR omits any discussion as to why the required facility would necessarily be located on a site with any particular land use designation or of any particular lot size. Furthermore, as the analysis does not address any of the categorical exemption requirements or any of the exceptions thereto, or evaluate any potential impact areas in particular, the statement that no significant environmental impacts would occur is conclusory and unsubstantiated. These claims again disregard the CEQA requirement to analyze the potential environmental impacts of such needed new facilities at the time that the need is cumulatively created by the Project and related projects.

Response to Comment No. 35-132

With regard to the adequacy of LAFD fire protection services and infrastructure, refer to Response to Comment Nos. 16-5, 16-10, and 26-147. With regard to emergency response times, refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35. With regard to population growth, cumulative impacts related to fire protection and the assertion regarding deferred analysis and mitigation, refer to Response to Comment No. 26-153.

Additionally, the fire protection features listed in LAFD's inter-departmental correspondence regarding the Project (see Appendix K of the Draft EIR) were not included as PDFs in the Draft EIR because they are a form of regulatory compliance. As discussed on pages IV.J.1-24 and IV.J.1-25 of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, the Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage, and management of hazardous materials, alarm and communications systems, etc., including the requirements set forth in the written correspondence from LAFD included in Appendix K of the Draft EIR. Compliance with applicable Building Code and Fire Code requirements for specific building designs would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118 prior to the issuance of a building permit. As discussed on page IV.J.125 of the Draft EIR, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and fire/life safety inspection, would ensure that adequate fire prevention features that reduce the demand on LAFD facilities and equipment are provided. As such, compliance with LAFD procedures and Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and, therefore, reduce the need for a new fire station or the expansion, consolidation, or relocation of an existing fire station. Refer also to the Confirmatory Fire Public Services Technical Memorandum included in Appendix FEIR-12 of this Final EIR which confirms impacts related to fire protection would be less than significant. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, Safety Element, and Wilshire Community Plan, as listed in Subsection 2.a, Regulatory Framework, of Section IV.J.1, Public Services—Fire Protection, of the Draft EIR, the City and LAFD would continue to monitor

the overall demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth.¹⁴⁵ Contrary to the commenter's assertion, this does not constitute deferred analysis. Furthermore, if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would be addressed, as necessary. Given these procedures and policy directives, Project impacts with regard to LAFD facilities and equipment would be less than significant.

Comment No. 35-133

2. The DEIR's Analysis of Police Protection Impacts Is Inadequate.

The DEIR does not adequately analyze the Project's potential to result in substantial adverse physical impacts associated with the provision of or need for new or physically altered police protection facilities.

The DEIR ignores the potential impact of the Project's construction employees on the need for police protection services, stating that "the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station." (DEIR, pp. IV.J.2–13) As discussed in Section II.O, *infra*, if construction activities continued for the maximum 20-year period, the DEIR could no longer reasonably characterize the Project's construction impacts as "temporary." Indeed, the demand for police protection services could persist for up to 240 months, yet the DEIR summarily dismisses this worst-case scenario assuming the construction activities would be "temporary."

Response to Comment No. 35-133

Potential impacts related to police protection during construction are thoroughly discussed on pages IV.J.2-13 to IV.J.2-14 and IV.J.2-18 to IV.J.2-19 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR. As discussed therein, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, as under existing conditions. Furthermore, access to the Project Site would continue to be controlled by staffed guard houses. Therefore, Project construction would not contribute to an increased demand for police protection services. Per Project Design Feature POL-PDF-1, additional security measures

¹⁴⁵ Refer to Framework Element Objectives 9.16 and 9.18, Safety Element Policy 2.1.6, and Fire Protection Objective 9-1 of the Wilshire Community Plan.

such as appropriate lighting, locked entry, and security patrols would be implemented during construction. With continued implementation of these security measures, the potential demand for police protection services at the Project Site during construction would be reduced. Furthermore, LAPD's needs for police protection services are primarily based on a permanent residential population, which would not occur as part of construction or operation of the Project. Thus, the Draft EIR accurately concludes that Project construction activities would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered governmental facilities. Therefore, impacts on police protection services during Project construction would be less than significant.

Refer also to Response to Comment No. 9-24 regarding buildout of the Project. As discussed therein, the Draft EIR conservatively assumes a 32-month construction duration that includes overlapping activities and construction phases and more intense activities on a daily basis. In addition, the Draft EIR analyzed a long-term buildout scenario. The 32-month timeframe is preferred by the Applicant and the Applicant intends to complete construction of the Project within this timeframe subject to market conditions.

Comment No. 35-134

With regard to operational impacts, the DEIR acknowledges that the 5,702 net new Project Site employees as estimated by the DEIR “may result in an increased demand for police services.” (*Id.*, p. IV.J.2-15) However, instead of attempting to analyze the potential environmental impacts associated with the provision of those required services, the DEIR concludes that “proposed Project design features, as well as the Project’s contribution to the General Fund, would help offset the Project-related increase in demand for police services.” (*Id.*, p. IV.J.2-16) The DEIR’s conclusion disregards the CEQA requirement to study the adverse physical impacts associated with the provision of required police services, rather than the extent to which the demand for services would be “offset.”

Furthermore, the DEIR acknowledges that “Project-related traffic could have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by congestion.” (*Id.*, p. V.J.2-16) [sic] As further discussed in Section II.Q, *infra*, analysis of the Project’s emergency access impacts was improperly scoped out of the DEIR, the Transportation Assessment prepared for the Project demonstrated that the substantially increased vehicle queues caused by the Project would exceed available storage space in turn pockets at surrounding intersections and block the Project’s new six-lane private street that would intersect with The Grove Drive, as well as the existing southern parking entrance/exit for the Broadcast Center building. (*Id.*, pp. 164–165, LLG Letter, pp. 17, 21–24) Notwithstanding these vehicles queues, the DEIR found that emergency response time impacts would be less than significant simply because “pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to

avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.” (DEIR, p. V.J.2-17) [sic] However, emergency vehicles may not be able to avoid this congestion, such as the vehicles that the Transportation Assessment indicates would be queued on both the northbound and southbound directions on The Grove Drive, with nowhere to go to make room for emergency vehicles. Therefore, the DEIR did not provide substantial evidence that the Project’s impact on emergency response times would be less than significant.

Response to Comment No. 35-134

The assertion that the Draft EIR fails to analyze Project impacts on the provision of police services is incorrect. Project impacts with respect to police protection are fully analyzed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR. As stated clearly therein and affirmed by LAPD, “the Project would not require any special police protection requirements and would not result in the need for new or altered police facilities.”¹⁴⁶ With regard to the adequacy of LAPD police protection services and infrastructure during operation, refer also to Response to Comment No. 16-5.

In regard to LAPD emergency response times, refer to pages IV.J.2-7 to IV.J.2-8 of the Draft EIR. As discussed therein, the Project Site is located within the Wilshire Division, which is served by the Wilshire Community Police Station. As shown in Figure IV.J.2-1 on page IV.J.2-8 of the Draft EIR, the Wilshire Community Police Station is located at 4861 West Venice Boulevard, approximately 3.7 miles southeast of the Project Site, with a response time of approximately 14 minutes to the Project Site. The Wilshire Community Police Station serves a population of approximately 250,000 residents and is staffed by approximately 256 sworn officers and 10 civilian support staff. The average response times for the station’s emergency—high priority, medium-high priority, and non-emergency calls from January 23, 2022, to February 19, 2022, were 4.7, 17.1, and 37.7 minutes, respectively. Citywide, the average response times for emergency—high priority, medium-high priority, and non-emergency calls during the same timeframe were 4.8, 16.0, and 34.1 minutes, respectively. As indicated by LAPD, the response times for the Wilshire Division are considered adequate.

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding the Transportation Assessment’s non-CEQA analysis of potential queuing at Project driveways, and Section B, Level of Service, of Topical

¹⁴⁶ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of the Draft EIR.

Response No. 12, Safety and Congestion, regarding the Transportation Assessment's non-CEQA analysis of vehicular congestion.

The comment that emergency access was improperly scoped out of the Draft EIR is incorrect. As discussed on pages 74 to 75 of the Initial Study, which is included in Appendix A of the Draft EIR, impacts regarding emergency access would be less than significant, and no mitigation measures are required. As stated in the Initial Study, according to the City's General Plan Safety Element, the nearest disaster routes in the Project area are Beverly Boulevard, adjacent to the Project Site's northern property line, and La Cienega Avenue, approximately 1.0 mile to the west. While it is expected that the majority of Project construction activities would be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the closure of any local public streets, and primary access to the Project Site would continue to be provided from the adjacent roadways. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, proximity of fire access roads to buildings, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses.

Comment No. 35-135

3. The DEIR's Analysis of Parks and Recreation Impacts Is Inadequate.

The DEIR also fundamentally errs by failing to study the Project's potential impacts associated with substantially increased use of local parks, including Pan Pacific Park, which is located directly across The Grove Drive from the Project Site.

Instead, the DEIR states that this environmental topic was scoped out in the Initial Study, which determined that the Project would not (a) result in the need for new or physically altered park facilities or (b) substantially increase the use of existing neighborhood and regional parks or other recreational facilities. (DEIR, pp. VI-30–31, Appendix A, pp. 70, 71–72)

However, the analysis in the Initial Study and repeated in Section VI (Other CEQA Considerations) of the DEIR falls far short of establishing that impacts related to parks or recreational facilities would be "clearly insignificant and unlikely to occur." Guidelines § 15143. For instance, the DEIR states that "[w]hile it is possible that some of the employees may utilize local parks and recreational facilities, such use would be anticipated to be

limited due to work obligations and the amount of time it would take for employees to access off-site local parks.” (*Id.*, p. VI-30) The DEIR also states that “only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities.” (*Id.*, p. VI-31) Given that the Project conceptually includes crosswalks connecting the Project Site to Pan Pacific Park, located directly across The Grove Drive from the Project Site, the DEIR should have considered the extent to which employee use of this park (which could occur before, after or conterminous with work obligations) could affect the physical condition and adequacy of service provided. As the Project proposes to introduce 5,702 net new employees to the Project Site, by the DEIR’s estimate, even “some of” or “a fraction of” these employees could create a significant impact, which should have been evaluated in the DEIR rather than being improperly scoped out.

Response to Comment No. 35-135

Potential impacts with regard to parks and recreation were thoroughly discussed in the Initial Study (included in Appendix A of the Draft EIR). As discussed on page 71 therein, the new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. The Project would also include a number of on-site outdoor areas including courtyards and rooftop decks for employees.

A minimum of approximately 28,900 square feet of open space would also be provided along the Project Site boundaries. Also note that the Department of Parks and Recreation typically bases its demand for parks and recreational facilities on the demand generated by residential populations, and residential uses are not proposed as part of the Project. Therefore, as concluded in the Initial Study, impacts related to parks and recreational facilities would be less than significant.

Comment No. 35-136

Q. The DEIR’s Analysis of the Project’s Transportation Impacts Is Inadequate.

1. The DEIR’s Analysis of Trip Generation and Vehicle Miles Traveled Conceals a Significant Impact By Excluding Project Components.

As introduced above, while the DEIR’s project description states that the Specific Plan will permit a broad range of uses, the Transportation Assessment (the “TA”) for the Project,

which is attached as Appendix M.1 to the DEIR and provides the foundation for the transportation analysis in the DEIR, only addresses and models a subset of uses associated with the DEIR Conceptual Plan and related DEIR Conceptual Program, which reflects one of an unlimited number of development options. The TA is based on particular floor areas for sound stages, production support, production office, general office, and retail. As noted in the TA,

[t]he conceptual Project Site plan shown in Figure 1 [*i.e.*, an enhanced DEIR Conceptual Plan that matches Figure IV.K-3 in the DEIR] is an illustrative design based on the Specific Plan guidelines for the purpose of the analysis in this Study. The eventual Project design may differ from Figure 1, but would continue to comply with the Specific Plan with regard to allowed land use types, densities, access, and other features. (DEIR, Appendix M.1, p. 2)

In other words, for all of the reasons discussed in Sections II.B and II.C, above, the scale and intensity of development ultimately approved for the Project Site may differ substantially from, and be greater than, what was analyzed in the TA and the transportation section of the DEIR. That is in part because, as stated in the DEIR, Hackman could choose to develop the Project Site with other uses permitted in the Specific Plan, including any permitted uses in the C2 zone. (DEIR, pp. II-15–16)

Response to Comment No. 35-136

Refer to Topical Response No. 3, Permitted On-Site Uses, for a discussion of the land uses allowed under the Specific Plan. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed throughout the Draft EIR, the Project is a studio project, and the proposed Specific Plan will permit five land uses—sound stage, production support, production office, and general office—as well as ancillary supporting sitewide uses related to the five land uses and operation of the studio. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. Importantly, the overall development density for the Project Site is limited to 1,874,000 square feet of floor area. The proposed Specific Plan does not permit additional development density. Please note that, as discussed in Topical Response No. 2, Definition of Floor Area Is Appropriate, the Draft EIR analyzed the potential physical environmental impacts of all proposed uses and activities, regardless of whether they are considered to be within the definition of floor area. Further, the Draft EIR analyzed not only the potential transportation impacts of the proposed development program but also potential VMT impacts under two maximum transportation impact scenarios (see page IV.K-75 of the

Draft EIR), and, therefore, the Draft EIR analyzed the maximum potential trip generation and VMT associated with the Project. Refer to Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 35-38 regarding the Land Use Exchange Program and the Draft EIR's comprehensive transportation analysis. Under all scenarios, transportation impacts were found to be less than significant.

Comment No. 35-137

Moreover, the TA, and therefore the DEIR, fails to account for all of the uses that are apparently part of the DEIR Conceptual Plan. In particular, the TA and DEIR transportation analysis do not analyze trip generation associated with the two planned production levels, which include basecamp areas, other production-related space and the Mobility Hub. (*Id.*, p. IV.K-74) With regard to the basecamp areas, according to the project description, the active uses in basecamp areas include, but are not limited to, loading, wardrobe, hair, make-up, craft service, etc.)" (*Id.*, p. II-7) According to Section IV.M (Water Supply and Infrastructure) of the DEIR, "[b]asecamp areas are dedicated to media production uses...." (*Id.*, p. IV.M.1-35)

As previously discussed, while the DEIR's project description, the DEIR Conceptual Plan and DEIR Conceptual Program all omit the floor area for the two production levels, the DEIR's water and wastewater analyses factor in 194,600 square feet of basecamp area, although this is far less than full amount of space within the production levels, which could easily be one million square feet.

However, the TA and DEIR ignore the active uses for the two production levels in calculating the Project's trip generation and vehicle miles travelled (VMT). (*Id.*, pp. IV.K-74–76 [Tables IV.K-4 and IV.K-5], Appendix M.1, pp. 122–123 [Tables 12 and 13]) Therefore, according to the transportation analysis, precisely zero vehicle trips would be generated by the production levels, including the numerous employees and vendors that would work in the basecamp areas.

Let us conservatively assume for the sake of argument that the only active use within the production levels would be the 196,000 square feet of basecamp area referenced in the DEIR's water and wastewater analyses. Even then, that floor area must be added to the 104,000 square feet of production support uses referenced in the TA and DEIR transportation analysis results, which results in a total of 300,000 square feet of actual production support space (based on the TA's daily vehicle trip rate for production support uses of 4.14 per 1,000 square feet). (Appendix M.1, p. 122 [Table 12]). Therefore, the omission of basecamp areas from the trip generation represents an additional 812 daily vehicle trips using the TA's own figures that the DEIR fails to disclose.

As the DEIR acknowledges, dedicating additional square footage to production support uses results in a higher VMT per employee. To illustrate this, the DEIR analyzes a scenario, permitted under the proposed land use exchange program, in which 350,000 square feet of sound stage space is exchanged for additional production support space. According to the DEIR, this permitted buildout scenario “would result in higher work VMT per employee than the proposed development program” and increase the average VMT per employee from 6.7 to 7.6. (DEIR, p. IV.K-77, Appendix M.3 [Supplemental VMT Memorandum], p. 4)

However, this so-called “maximum impact” scenario disregards the 196,000 square feet or more of basecamp area dedicated to production support, as expressly stated in the DEIR. If the basecamp areas were properly included, it is apparent that average VMT per employee would exceed the significance threshold of 7.6. And, the exceedance would be greater if the TA and transportation analysis considered the other production-related uses within the production levels. It is not a stretch to surmise that the Specific Plan specifically excludes “basecamp areas,” even when within a building, as well as “outdoor production areas” (*id.*, p. II-13 [Table II-2, note a]), to provide a basis to understate the Project’s transportation and other impacts. Regardless, however, of how “floor area” is defined in the undisclosed Specific Plan, or the LAMC for that matter, the TA and DEIR transportation analyses fail to disclose a significant VMT traffic impact that would result if the vehicle trips associated with the basecamp areas and other production-related activities within the two production levels had properly been considered.

Response to Comment No. 35-137

Basecamp space is fully accounted for in the Transportation Assessment (Appendix M.1 of the Draft EIR) and the Draft EIR. As discussed in Topical Response No. 10, Trip Generation, basecamp space is an ancillary support space necessary at all studio production campuses. It provides temporary staging for support services, such as loading, wardrobe, hair and makeup, and craft services, as well as parking and storage. These uses do not generate external vehicle trips of their own. The sound stages and production support space generate trips, and the basecamp space acts in a manner similar to a parking structure supporting an office building.

Notwithstanding that basecamp space is not the same as production support space, a supplemental VMT analysis was conducted, specifically in response to this comment, of a scenario in which basecamp space were assumed to generate trips and VMT just like production support space. Therefore, this scenario assumes a total of 300,000 square feet of production support space rather than the 104,000 square feet assumed in the Conceptual Site Plan. The results of this analysis are shown in Table II-31 and Table II-32 on pages II-1416 and II-1417. As shown in Table II-31, this hypothetical scenario would have approximately 8,144 non-retail employees (compared with approximately 7,752 under

**Table II-31
Custom Land Inputs Use for VMT Analysis**

Land Use	Size	Daily Vehicle Trip Rates	Daily Vehicle Trips ^a	Employee Rate ^b	Employees
Conceptual Plan Scenario with 196,000 sf of Additional Production Support Space					
Stages	350,000 sf	5.91	2,069	0.00556	1,944
Production Support	300,000 sf	4.14	1,242	0.002	600
Production Office	700,000 sf	9.34	6,538	0.004	2,800
General Office	700,000 sf	10.06	7,006	0.004	2,800
Total Studio-Related Uses	2,050,000 sf		16,855		8,144
Maximum Transportation Impact Scenario 2 plus 196,000 sf of Additional Production Support Space					
Stages	0 sf	5.91	0	0.00556	0
Production Support	650,000 sf	4.14	2,691	0.002	1,300
Production Office	700,000 sf	9.34	6,538	0.004	2,800
General Office	700,000 sf	10.06	7,006	0.004	2,800
Total Studio-Related Uses	2,050,000 sf		16,235		6,900
^a Daily trip estimates exclude the 15-percent transit/walk-in credit because transit usage assumptions are built into the VMT Calculator. ^b Employee rates were identified in the Initial Study. Source: Gibson Transportation Consulting, Inc., 2023.					

the proposed development program) and would generate approximately 16,855 raw trips (before processing through the VMT Calculator). These two factors served as inputs to the custom land use feature of the VMT Calculator. Table II-32 on page II-1417 shows that this scenario would generate a total of approximately 14,072 daily trips (after processing by the VMT Calculator) and 6.7 work VMT per employee, which is the same as the proposed development program. Therefore, the Project would similarly not result in significant VMT impacts if basecamp space were considered to be production support space. Note that the work VMT per employee remained constant even though the total number of trips increased. This is because the work VMT per employee is based on the mode split and the geographic distribution of the employment work force, and the hypothetical basecamp analysis assumed the same geographic distribution of employees and the same mode split as the proposed development program. The increase in the number of trips did not change the average work VMT per employee because the average work VMT per employee is based on the location of the project in relation to the residential distribution serving the site and the mode split choices available to those employees. Please note that this hypothetical scenario is not realistic and overstates impacts given that basecamp activity is generated from and dependent upon sound stage uses, which have already accounted for basecamp activity from a traffic perspective.

**Table II-32
VMT Analysis Summary**

Description	Conceptual Plan Scenario with 196,000 sf Additional Production Support Space	Maximum Transportation Impact Scenario 2 Plus 196,000 sf Additional Production Support Space
Land Use		
Stage, Production, and Office Uses	2,050,000 sf	2,050,000 sf
Public-Serving Commercial Uses	20,000 sf	20,000 sf
Gross Total Project VMT Analysis^a		
Residential Population	N/A	N/A
Employee Population	8,224	6,980
Project Area Planning Commission	Central	Central
Travel Behavior Zone (TBZ)	Compact Infill	Compact Infill
Maximum Allowable VMT Reduction	40%	40%
Gross Total Daily Vehicle Trips	14,072	13,599
Gross Total Daily VMT	100,312	9,690
Total Household VMT	—	—
Household VMT per Capita	—	—
Impact Threshold	6.0	6.0
Significant Impact	No	No
Total Work VMT	54,802	52,802
Work VMT per Employee	6.7	7.6
Impact Threshold	7.6	7.6
Significant Impact	No	No
<i>sf = square feet</i> ^a Results based on the City of Los Angeles VMT Calculator Version 1.3 (July 2020). Detailed outputs provided in Appendix FEIR-21 of this Final EIR. Source: Gibson Transportation Consulting, Inc., 2023.		

Contrary to the commenter's claim, the Draft EIR does not "acknowledge" that additional production support square footage results in a higher VMT per employee. Rather, the maximum transportation impact scenario 2 noted in the comment found that the *exchange* of sound stage space for additional production support space under the proposed Land Use Exchange Program resulted in higher VMT per employee. This difference was actually the result of the loss of sound stage space, which has a lower overall VMT per employee, rather than the increase of production support space. Production support space, if considered in isolation (which is a faulty assumption, since it by definition supports sound stages), generates VMT per employee at rates similar to general office and production office and similar to the proposed development program as a

whole. Nevertheless, even under this scenario, the Project would not result in a significant VMT impact.

The comment goes on to suggest that applying the additional basecamp space to the production support space in maximum transportation impact scenario 2 (resulting in 650,000 square feet of production support space) would result in a significant VMT impact. Maximum transportation impact scenario 2 was provided in Appendix M.3 of the Draft EIR. In response to this comment, an additional supplemental analysis was conducted of a hypothetical scenario that adds 196,000 square feet of production support space to maximum transportation impact scenario 2. The results of this analysis are also provided in Table II-31 and Table II-32 on pages II-1416 and II-1417. As shown in Table II-31, this hypothetical scenario would have approximately 6,900 non-retail employees and would generate approximately 16,235 raw trips (before processing through the VMT Calculator). These two factors served as inputs to the custom land use feature of the VMT Calculator. Table II-32 shows that this scenario would generate a total of approximately 13,599 daily trips (after processing by the VMT Calculator) and 7.6 work VMT per employee, which is the same VMT per employee as maximum transportation impact scenario 2. Therefore, this hypothetical scenario in which basecamp space were considered production support space would similarly not result in significant VMT impacts.

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, regarding the definition of floor area and the Draft EIR's analysis of production activities. Notably, CEQA requires an analysis of all physical environmental impacts, regardless of how something is defined or classified in a land use regulation (e.g., noise impacts from an above-ground parking structure must be analyzed under CEQA even though a parking structure is not considered floor area under the LAMC). As such, even though basecamp and outdoor production activities are not counted as floor area, these activities were fully accounted for in the EIR's environmental analysis. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 35-138

The VMT analysis in the TA and the DEIR also ignore the contemplated Mobility Hub. The Mobility Hub, with an estimated construction cost of \$50 million, would include a "shuttle service between the Project Site and the Metro D Line Wilshire/Fairfax Station." (DEIR, Appendix M.1, p. 186) It would also include "space to accommodate support uses, storage, maintenance, staging facilities, bicycle share or similar first-mile/last-mile programs, and other amenities" and a "transportation information center" (*id.*, pp. 5, 116), as well as support shuttle services to connect to unspecified "existing and future transit stations (e.g. Metro B Line or Crenshaw North Extension)." (*Id.*, p. 117) Similar to the basecamp areas, the DEIR's water and wastewater analyses factor in at least 36,000 square feet of basecamp area. (DEIR, pp. IV.M.1-35–38 [Tables IV.M.1-5 and IV.M.1-6])

However, the TA and the DEIR's transportation analysis also ignore the Mobility Hub in the trip generation forecasts and the VMT analysis. Specifically, they do not even attempt to disclose how VMT would be impacted by the various shuttle services that the Project may provide, including the Mobility Hub shuttles discussed above. In addition, the DEIR provides that "[w]hile the conceptual site plan... illustrates specific parking locations, ultimately, parking may be located anywhere within the Project Site or off-site.... [O]ff-site parking due to any displacement resulting from production filming and related activities may be provided, with shuttle service to the Project Site as needed." (DEIR, p. IV.K-44) The DEIR does not address the VMT impact associated with these unspecified parking shuttles, nor the production filming and related activities that may displace onsite parking. This disregard for planned activities in connection with the DEIR Conceptual Plan permeates the DEIR's transportation analysis, severely curtailing its usefulness as an information-disclosure document and consistently understanding project-related transportation impacts.

As another example, the TA concludes that 128 rideshare trips per hour to the Project Site could occur. (*Id.*, Appendix M.1, p. 149) However, the effect of ridesharing is not accounted for in the project trip generation forecast. Rideshare usage doubles the number of trips into and out of a project site as each person trip end generates two vehicle trip ends (*i.e.*, a trip with the employee/patron/guest and an additional trip by the driver of the vehicle without the employee/patron/guest). (*Id.*, pp. IV.M.1-35–38 [Tables IV.M.1-5 and IV.M.1-6])

Response to Comment No. 35-138

The comment suggests that the Mobility Hub would generate trips and VMT that were not analyzed in the Draft EIR. This is a misunderstanding of the Mobility Hub and its functions. Refer to Topical Response No. 7, Mobility Hub, for information about the functions that would be provided by the Mobility Hub. These functions, which are geared toward providing first-mile/last-mile services for those using alternative travel modes to and from the Project Site, serve to reduce automobile travel and its resulting VMT to and from the Project Site. The OPR Technical Advisory specifically states, "Transit and other active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and rapid transit projects, and bicycle and pedestrian infrastructure projects." The Mobility Hub directly supports the Project's TDM plan to reduce automobile trips. Therefore, it would not result in a VMT impact.

It should be noted that the Draft EIR conservatively excluded the trip-reducing effects of the Mobility Hub's uses in the transportation and VMT analyses in the Draft EIR, as stated on page IV.K-74 of the Draft EIR. Had those effects been included in the analysis, the VMT results would have been lower as shown in a supplemental analysis provided in Appendix E of the Transportation Assessment (Appendix M.1 of the Draft EIR).

A summary of the net vehicular and VMT effects of the Mobility Hub may be found in Appendix FEIR-20 of this Final EIR to support the emissions analysis discussed in the Appendix. The overall effects of the Mobility Hub activities would reduce vehicle trips to/from the Project Site by a net of approximately 3,400 trips per day and reduce overall Project VMT by over approximately 23,500 VMT per day. Thus, while some additional trips would be generated to/from the Mobility Hub, the overall effect of the services provided by the Mobility Hub would result in a reduction of both vehicle trips and Project VMT.

As discussed in Section B, Off-Site Parking, of Topical Response No. 13, Parking, the Project does not intend to implement an off-site parking program or negotiate an agreement with the City regarding off-site parking. The Project does not need off-site parking to meet its peak parking demands and, therefore, is no longer proposing such a program. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Regarding rideshare trips, the estimate of up to approximately 128 peak hour rideshare trips in the Transportation Assessment was a conservative example to demonstrate that the Project's proposed rideshare spaces would be sufficient to accommodate even a conservative rideshare volume. It is not expected that rideshare demand would regularly approach 10 percent of trips. Nonetheless, while a rideshare trip can generate two trip ends as noted in the comment, the Draft EIR conservatively excluded the effects of all the TDM measures as discussed above, which collectively would substantially reduce trips. Comparing the approximately 13,454 daily trips estimated to be generated by the Conceptual Site Plan without the TDM plan from Table IV.K-5 of the Draft EIR to the approximately 11,346 daily trips estimated to be generated with inclusion of all the TDM measures (from Appendix E of the Transportation Assessment), the TDM measures reduce trips by approximately 16 percent, which is well over the hypothetical 10-percent rideshare assumptions noted in the comment. Therefore, the Transportation Assessment and Draft EIR analysis remains conservative.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, which discusses how the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

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In addition, the transportation analysis ignores vehicle trips and VMT generated by construction workers, construction equipment and truck haul trips. (DEIR p. IV.K-80) There is no reasoned basis provided by the DEIR for not complying with law by analyzing

foreseeable construction traffic using standard, accepted methodology. *Berkeley Keep Jets Over the Bay Com. v. Ed. of Port Comrs.*, 91 Cal. App. 4th 1344, 1370 (2001).

Response to Comment No. 35-139

CEQA does not require a VMT analysis of construction traffic; CEQA Guidelines Section 15064.3(b) notes, “for many projects, a qualitative analysis of construction traffic may be appropriate.” The City does not require an analysis—quantitative or qualitative—of VMT impacts during construction based on the TAG. Refer to Topical Response No. 14, Construction Vehicle Impacts, for a detailed discussion of why construction VMT analysis is not required and that Project construction generates substantially fewer trips than Project operation. As discussed in Section IV.K, Transportation, of the Draft EIR, transportation impacts were comprehensively analyzed and determined to be less than significant during construction of the Project.

Comment No. 35-140

Nor does the DEIR study traffic associated with proposed special events. (DEIR, p. II-15) The DEIR does not even mention the need for a special event traffic management plan. The project description also states that the project buildings may include rooftop terraces or decks that would serve as outdoor gathering spaces from 7 A.M. to 12 A.M. (*Id.*, p. II-23) However, the TA and DEIR also fail to evaluate the transportation impacts related to this use, including the vehicle miles traveled with regard to rooftop special events.

As further discussed in the LLG Letter, the TA and DEIR also ignores the operational transportation impacts associated with live-audience studio programs. (LLG Letter, pp. 14, 19–21)

For all of these reasons, the DEIR fails as an information disclosure document. See, e.g., *Napa Citizens for Honest Gov’t v Napa County Ed. of Supervisors*, 91 Cal. App. 4th 342,356 (2001) (an EIR must be prepared with a sufficient degree of analysis to provide decisionmakers with the information needed to make an intelligent judgment concerning a project’s environmental impacts.); *Laurel Heights*, 47 Cal. 3d at 392 (an EIR should, when looked at as a whole, provide a reasonable, good faith disclosure and analysis of the project’s environmental impacts).

Response to Comment No. 35-140

Refer to Section C, Special Events, of Topical Response No. 10, Trip Generation, for a transportation-related discussion of special events. As described therein, the studio regularly hosts small production-related events during the normal course of studio productions, as well as a small number of larger production-related events, which are

typically held on nights and weekends. Larger special events, which currently occur at Television City several times per year, would continue to require special event permits from the City consistent with existing conditions. The proposed Specific Plan would not provide any additional authority related to conducting special events in any way. In other words, the Project does not propose a change from existing conditions in this regard.

Studio audience trips are also discussed in detail in Section A, Visitor Trips, of Topical Response No. 10, Trip Generation. As concluded therein, these trips represent a small percentage of total daily campus trip generation and an even lower percentage of the net Project increase in daily trips.

These events do not affect the VMT analysis because that analysis focuses on home-to-work employee trips as recommended by the OPR Technical Advisory and because these trip types generate the vast majority of VMT in a development, such as the Project, as discussed in Topical Response No. 8, Vehicle Miles Traveled. The small number of non-employee trips generated by events relative to the typical daily trip generation does not affect the VMT per employee calculations or conclusions. Therefore, the transportation impact analysis presented in the Draft EIR is sufficient and valid under CEQA.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, which discusses how the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

Comment No. 35-141

2. The DEIR's Analysis of the Project's VMT Traffic Impact Is Otherwise Significantly Flawed and Inadequate.

The discussion in the preceding section demonstrates that, even if the methodology used in the VMT analysis in the TA and DEIR was appropriate, the Project would have a significant VMT traffic impact that is not disclosed. However, the VMT methodology is itself flawed, which results in an even graver understatement of the Project's VMT traffic impact.

First of all, the TA and DEIR transportation analysis rely on the City's VMT Calculator tool despite the express statement in the City's VMT Calculator User Guide that the VMT Calculator cannot be used for specific plans or entertainment uses. As stated in the DEIR,

LADOT developed City of Los Angeles VMT Calculator Version 1.3 (July 2020) (VMT Calculator) to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

The methodology for determining VMT based on the VMT Calculator is consistent with CEQA Guidelines Section 15064.3 and the TAG. (DEIR, p. IV.K-6)

However, according the City's VMT Calculator User Guide, "[a]lthough the tool may be useful for other purposes," it is not designed to do the following: "[e]valuate VMT impacts of regional-serving retail projects, entertainment projects, or event centers" or "land use plans (e.g., general plans, community plans, and specific plans)." (VMT Calculator User Guide, Version 1.3, May 2020, Section 1.1, pp. 2–3) The City's Transportation Assessment Guidelines (the "TAG") further state that a "project-specific customized approach will be required to estimate VMT impacts" for "regionally-serving entertainment projects." (TAG, p. 2-9)

As discussed in the LLG Letter, the TA and DEIR should have employed the methodology prescribed by the TAG for proposed land use plans such as the Specific Plan. (TAG, July 2020, pp. 2-9–10, LLG Letter, pp. 9–10) The TAG requires land use plans to "be evaluated using modified versions of the City's Travel Demand Forecasting (TDF) model to determine if the proposed VMT per service population in the future with project scenario will exceed the two-part thresholds described in Section 2.2.3." (*Id.*) As described in Section 2.2.3, a land use plan will have an impact if (1) "[t]he anticipated land use growth under the proposed plan would result in an average total VMT per service population in the horizon year that exceeds 15% below the regional average total VMT per service population for the baseline year from the most recent SCAG RTP/SCS" or (2) "[t]he land use growth anticipated under the plan would result in an average total VMT per service population in the plan horizon year that exceeds the average total VMT per service population in the plan area for the baseline year from the most recent locally validated travel demand forecasting model." (*Id.*, p. 2-7) Service population is defined as "all of the people living and working within the plan or project area." (*Id.*) The plan area "will be defined by the area directly affected by the proposed plan, which is generally... a specific plan area for specific plans...." (*Id.*)

This methodology prescribed by the TAG is more appropriate as it allows for modelling "the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed plan.... Total VMT per service population would be calculated for all scenarios generated by land use within the project area, which is generally the plan area." (*Id.*, p. 2-10) As the TAG explains, for land use plans, "the City's TDF model will need to be refined to create a sub-area TDF model with the adequate level of detail within the respective community plan area for improved sensitivity in measuring the effect of land use development and transportation network changes. The assessment should cover the full area in which the plan may substantially affect travel patterns." (*Id.*) The VMT Calculator is not designed to be able to and is not capable of adequately addressing VMT impacts associated with land use plans, such as the Specific Plan.

The transportation analysis in the TA and DEIR doubles down on this error by relying on custom VMT Calculator inputs, which are inconsistent with one another and collectively incoherent. The TA and DEIR estimate that the Project would include 7,752 non-retail project site employees for the total of 1,854,000 square feet of studio-related land uses that were input into the VMT calculator. (DEIR, p. IV.K-73) To support this estimate, the TA and DEIR reference Table 3 of the Initial Study. (DEIR, p. IV.K-73, Appendix M.3 [Table 2, note e], LLG Letter, pp. [sic] 13) Table 3 of the Initial Study, in turn, bases its employee generation rate on the City's VMT Calculator but uses a completely different approach than the VMT Calculator inputs relied on by the TA and the DEIR. To arrive at the employee estimate, Table 3 "[a]ssumes general retail rate for production support; general office rate for production office and general office." (DEIR, Appendix A, p. 68 [Table 3, note a]) The employee estimate based on these VMT Calculator land use inputs is then fed back into the VMT Calculator in combination with different and inconsistent, custom land use inputs. (LLG Letter, p. 14) The inconsistency here is that the Initial Study's VMT Calculator model run input the production support space using the built-in general retail rate and production office space using the built-in general office rate, while the TA's VMT Calculator model run input these uses as a combined custom studio land use.

The VMT calculator inputs used in the VMT analysis also selectively rely on "empirical studies of trip generation at other studios in Los Angeles." (DEIR, p. IV.K-35) According to the TA, "[d]aily trip generation rates for stages, production support, and production office uses are based on empirical data from other studios in Los Angeles...." (TA, p. 81 [Table 6, note c]) However, the TA and DEIR provide no substantiation that the empirical data, which were collected for film studios at different locations in the City and involving little-to-no audience soundstage capacity, actually applies here. But what is most bewildering is that the VMT analysis was not based on employee data for the **Existing Television Studio**, which is directly applicable in calculating the average VMT for employees. Nor do the preparers of the TA and DEIR provide any explanation for their failure to use this far more relevant employee travel data.

Furthermore, while, according to the DEIR, "the trips generated by production office during the standard commuter peak hours are fewer than those generated by a typical office building," an assumption which results in reduced trip generation forecasts, studio-related employees are paradoxically "expected to have daily travel characteristics similar to general office employees," which results in reduced vehicle miles travelled calculations. (DEIR, pp. IV.K-35, IV.K-73, Appendix M.1, p. 115)

Based on the improper use of the City's VMT Calculator and in reliance on flawed custom inputs into the VMT Calculator, the TA and DEIR conclude that the Project's average work VMT per employee is 6.7 miles per day (3.35 miles one-way). In other words, they conclude that the average commute by employees would, on average, be a 3.35-mile

radius of the Project Site. For the reasons discussed below, this significantly understates the Project's VMT impact.

Response to Comment No. 35-141

Refer to Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-31, 9-32, 20-3, and 26-E.4-9 regarding the appropriateness of using the City of Los Angeles' VMT Calculator to analyze VMT for the Project and the assumptions that were used in the VMT analysis. Topical Response No. 8 includes an explanation of why a development project implemented under a specific plan can and should be analyzed using the VMT Calculator and describes why the Project is not large enough to change demographics in a meaningful way such that the data underlying the VMT Calculator would become invalid. As substantiated therein, the approach to, and assumptions for, using the City's VMT Calculator tool to analyze the Project's VMT impacts were appropriate, as acknowledged by LADOT in its Assessment Letter that is presented in Appendix M.2 of the Draft EIR.

The use of empirical studies of trip generation at other studios in Los Angeles as input into the VMT calculations completed for the Transportation Assessment (included in Appendix M.1 of the Draft EIR) served to validate the assumptions applied in the transportation analysis (see Section IV.K, Transportation, of the Draft EIR), based on similar types of studios uses. Refer to Topical Response No. 10, Trip Generation, which provides a discussion on the validity of the empirical data used to estimate trip generation for sound stage, production support and production office uses at the Project Site, as well as a comparison of actual driveway counts of existing trips at the Project Site to estimates using the empirical data. It should be noted that the employee assumptions in the VMT calculations for the Transportation Assessment and Draft EIR are the same as what was estimated in Table 3 of the Initial Study included in Appendix A of the Draft EIR (i.e., approximately 7,752 non-retail employees and approximately 80 retail employees for a total of approximately 7,832). Refer to Response to Comment No. 26-E.4-11 for further response to the incorrect claim that there was a discrepancy in the estimation of Project Site employees and the inputs into the VMT Calculator.

It should also be noted that the work VMT per employee analysis presented in the Transportation Assessment and Draft EIR is presented in terms of one-way trips; specifically, as stated on page IV.K-30 of the Draft EIR, "*These thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of **one-way trips**....*" (emphasis added). As such, the commenter's assertion that the Transportation Assessment and Draft EIR conclude that the Project's average work VMT per employee per day is 3.35 miles one-way is incorrect. For a more detailed discussion and illustration of this calculation, see Section C, Assumptions in the VMT Analysis, Employee Trip Length, of Topical Response No. 8, Vehicle Miles Traveled.

Section IV.K, Transportation, of the Draft EIR comprehensively evaluated the potential VMT impacts of the Project using conservative assumptions and correctly concluded that impacts would be less than significant.

Comment No. 35-142

Existing commute distances based on census data indicate that the average VMT per employee is actually much greater than 6.7 miles per day. According to easily available online census data, more than 50% of the employees at the Existing Television Studio travel more than 10 miles each way for their commute, more than 25% commute at least **25 miles** one way, and more than one in eight travel more than 50 miles one way. (See **Exhibit 6**) This reflects that the average VMT for employees is far more than 6.7 miles roundtrip per day and far in excess of the significance threshold of 7.6 roundtrip miles per day. The TA and DEIR should have utilized residential zip code data of current employees at the Existing Television Studio in lieu of the generic commuter VMT value produced by the City's VMT Calculator. This significant discrepancy reflects the improper use of the VMT Calculator and helps explain why the VMT Calculator User Guide and the TAG state that the VMT Calculator cannot be used for this type of project.

Furthermore, as discussed in the LLG Letter, GPS data provided by StreetLightData demonstrates an average one-way trip length for all vehicles traveling to the Project Site of 17.1 miles. (LLG Letter, p. 11) LLG also obtained cell phone tracking data showing that, of individuals who made at least 75 annual trips to the Project Site in 2018 and 2019 and assumed to be employees, over 65% traveled greater than seven miles one-way. (LLG Letter, pp. 11–12) These data further demonstrate why the use of the VMT Calculator Project was improper.

There are several additional methodological errors that further expose the inadequacy of the transportation analysis. As explained in the DEIR, “estimates for each land use were reduced by 15 percent to account for staff and visitors traveling to the Project Site via public transit rather than automobile due to the Project numerous bus/transit options.” (p. IV.K-35) However, according to the latest update of the TAG, only

[d]evelopments within a 1/4-mile walking distance of a transit station, or of a stop serving a Metro Next Gen Tier 1 service line, may qualify for up to a 15% trip generation adjustment. The actual adjustment provided will be determined by an analysis of the transit service frequency and density at the specified transit station or a stop serving a Metro Next Gen Tier 1 service line. (TAG, August 2022, p. 3-11)

The DEIR does not identify any transit station or Metro Next Gen Tier 1 service line within a quarter-mile of the Project Site and no such station or line exists. (DEIR, p. IV.K-19) Given

that the DEIR only identifies local and limited bus routes in the study area, the 15% transit usage reduction is improper.

Response to Comment No. 35-142

Refer to Response to Comment Nos. 9-30 and 35-141 above and Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project's VMT analysis, including as related to employment trip length and the provision of empirical data in support of the subject analysis. As substantiated therein, the approach to and assumptions for using the City's VMT Calculator tool to analyze the Project's VMT impacts were appropriate, as acknowledged by LADOT in the Assessment Letter included as Appendix M.2 of the Draft EIR.

Regarding the non-CEQA analysis and trip reduction associated with staff and visitors traveling to the Project Site via public transit, Table 4A on page 58 of the Transportation Assessment (provided as Appendix M.1 of the Draft EIR) notes that there are numerous bus transit options on Fairfax Avenue and Beverly Boulevard. Metro Rapid 780 on Fairfax Avenue has been discontinued, but, according to Metro,¹⁴⁷ Route 180/217 on Fairfax Avenue is a Next Gen Tier 1 service line and provides a stop adjacent to the Project Site at Fairfax Avenue and Beverly Boulevard. Regardless, LADOT's approval of the 15-percent transit credit applied to the Project's peak hour trip generation estimates was stated in a Memorandum of Understanding (Appendix A to the Transportation Assessment), which was signed in June 2021, and LADOT's Assessment Letter reviewing the Transportation Assessment (Appendix M.2 of the Draft EIR) was issued in November 2021, nearly a year prior to the TAG update in August 2022, which changed the qualification language for a 15-percent transit credit. Notwithstanding, as noted above, the Project is adjacent to a Next Gen Tier 1 transit stop and, thus, continues to qualify for the 15 percent transit credit-. For all of the above reasons, the peak hour trip generation estimates—which were only used in the non-CEQA analysis in the Transportation Assessment—are valid and appropriate. Refer to Section A, TDM Effects on Trip Generation, of Topical Response No. 11, Transportation Demand Management, for a detailed discussion of the 15-percent trip generation adjustment.

Comment No. 35-143

Another significant flaw in the DEIR's transportation analysis is that it, as well as the underlying TA, fail to analyze the Project's transportation impacts under a Long-Term Buildout to 2043. Instead, they only evaluate a 2026 Buildout. The TA and DEIR must be

¹⁴⁷ City of Los Angeles Department of City Planning, Metro NextGen: Rapid Bus Definitions, March 25, 2021.

augmented to evaluate the traffic impacts associated with a Long-Term Buildout that could be more impactful than a 2026 Buildout.

For these reasons alone, the DEIR is woefully inadequate in its disclosure of the Project's VMT-related transportation impacts.

Response to Comment No. 35-143

The comment misunderstands the nature of the CEQA VMT analysis. The VMT analysis is based on the SCAG long-range travel demand forecast model, which projects traffic levels 20 years into the future. The CEQA transportation impact criteria measure the VMT of a project under long-range future conditions as calculated by the LADOT VMT Calculator (which is based on the SCAG long-range model). Additionally, the TAG notes on page 2-11 (consistent with the recommendations in the OPR Technical Advisory) that a project can be considered not to contribute to a cumulatively significant VMT impact (i.e., a long-range impact considering all other long-term development) if it is found not to have a VMT per employee impact in the VMT Calculator. Refer to pages IV.K-80 to IV.K-81 in Section IV.K, Transportation, of the Draft EIR for an analysis of potential impacts under a long-term buildout scenario. As stated therein, the Project's impact analyses per the CEQA Guidelines Appendix G transportation thresholds and the TAG are not dependent upon the Project buildout date, and, therefore, the results and conclusions presented in Section IV.K of the Draft EIR are applicable to a long-term completion date. As such, a later buildout date would not affect the Draft EIR's transportation analysis and less-than-significant impact conclusions.

The non-CEQA transportation operational analysis is an analysis requested by LADOT, and it focuses on the likely operational impacts of Project vehicles on nearby travel corridors and intersections. LADOT does not require an operational analysis for 20-year time horizons because the nature of travel demand forecasts that far into the future are speculative at best, and because the conservative practice of assuming a 1-percent annual ambient growth, as well as development of all known related projects in a year 2026 analysis, overestimates traffic growth. In fact, the traffic growth projected in the Study Area, when both related project traffic and an ambient 1-percent background traffic rate are combined, results in a 2026 Future Base condition that is 12.8 percent higher than the 2019 Existing Conditions base traffic levels. This overall 12.8-percent traffic growth is higher than the SCAG model projections for 2040 Future Base conditions. Contrary to the comment's conclusion, the Draft EIR and its Transportation Assessment included in Appendix M.1 of the Draft EIR investigated the Project's VMT impacts for the long-term horizon through the use of the LADOT VMT Calculator. A 20-year analysis of the potential non-CEQA transportation operational impacts of a Project is not required by LADOT.

Comment No. 35-144**3. The DEIR Fails to Provide Substantial Evidence That the Project Would Not Obstruct Adopted Programs, Policies, Plans and Ordinances Adopted To Protect the Environment.**

The DEIR's evaluation of the Project's consistency with plans is vague, conclusory and outright wrong in several significant respects. The DEIR fails to acknowledge clear and substantial conflicts with plans and fails to disclosed significant impacts to the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

To begin with, the Project studied in the DEIR is flawed in its reliance on vehicle travel and failure to accommodate pedestrians and other roadway users, in conflict with established City, Regional, and State policies. See, e.g., Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), AB 32, the Global Warming Solutions Act of 2006, Senate Bill (SB) 375 of 2009, SCAG's RTP/SCS Goal 2: "Improve mobility, accessibility, reliability, and travel safety for people and goods," and additional City policies referenced below. The failure to adequately address pedestrian safety is particularly notable given the widely-reported increase in pedestrian fatalities in the City, from already high levels, despite the first objective in Mobility Plan 2035 to "decrease transportation related fatality rate to zero by 2035." (Mobility Plan 2035, p. 79) It bears emphasis that the Project Site is surrounded by stretches of Fairfax Avenue and Beverly Boulevard that are already among 6% of the City's streets that result in 65% of deaths and severe injuries to pedestrians. (Vision Zero Los Angeles, *Los Angeles Vision Zero Technical Analysis: Final Report 2015*, Los Angeles Department of Transportation, 2015) Nevertheless, the Project, as currently embodied by the DEIR Conceptual Plan, includes a new multi-level network of "internal roadways" complete with "vehicular ramp" interchanges, new and questionable intersections where existing public streets meet new private streets, and 5,300 parking spaces (enough to fill approximately 20 football fields), which collectively appear to substantially increase risks to pedestrian safety. (DEIR, pp. IV.K-42-44)

The DEIR also neglects pedestrian safety issues associated with passenger and production vehicles, various shuttles, and delivery trucks arriving and departing, driving up and down ramps, crossing sidewalks and internal walkways, and operating alongside outdoor production activities throughout the Project Site.

The Project also conflicts with (1) Policy 1.1 in Mobility Plan 2035, to "[d]esign, plan, and operate streets to prioritize the safety of the most vulnerable roadway user," (2) Wilshire Community Plan Policy 11-2, to "[p]romote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers," and (3) Citywide Design Guideline 1, to "[p]romote a safe, comfortable, and

accessible pedestrian experience for all.” As detailed in the LLG Letter, the construction of the two new private streets adjacent to the western and southern boundaries of the BC Site would result in a significant impact on pedestrian safety. (LLG Letter, pp. 3–5)

The new private streets and reconfiguration of The Grove Drive, designated as part of the Neighborhood Enhanced Network, would also conflict with Mobility Plan 2035 Policy 2.4. The Grove Drive should be designed in accordance with the Complete Streets Design Guide and implement traffic calming features, “including curb bulbouts, mini traffic circles, neckdowns, raised crosswalks, and diagonal diverters.” (Complete Streets Design Guide, p. 17.) Instead, it is clear that the conditions proposed for the Grove Drive, when considering the existing use of curbside space for residential and supermarket loading operations, the proposed hazardous design features detailed in the LLG Letter, and the inordinate vehicle queue lengths exacerbated by the Project, are anything but enhanced for the neighborhood.⁵¹ (LLG Letter, pp. 5, 7, 15-19, 21–24)

As a further risk to pedestrian safety, and as discussed in the LLG Letter, the DEIR Conceptual Plan includes substandard sidewalk widths along both The Grove Drive and the Beverly Boulevard project frontages. (DEIR, p. IV.K-56, LLG Letter, p. 7) According to the TAG, “[i]f the project dedications and improvements asking to be waived are necessary to meet the City’s mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.” (TAG, July 2020, Attachment D [Plan, Policy, and Program Consistency Worksheet], p. 2) The DEIR does not, and cannot, explain why the requested waiver of dedication for the sidewalk widths required by Mobility Plan 2035, an element of the City’s General Plan, does not conflict with that width requirement. (DEIR, p. IV.K-56)

Policy 15-1.1 of the Wilshire Community Plan is to “[m]inimize the number of ingress and egress points to and from all Boulevards II and Avenues in the Wilshire Community Plan Area.” The DEIR Conceptual Plan includes two new driveways at Beverly Boulevard and one at Fairfax Avenue, which streets are both designated as Avenues in Mobility Plan 2035. This substantially increases vehicle/pedestrian conflict points and represents another undisclosed conflict with the Wilshire Community Plan. According to the DEIR, “[a]lthough the Project would result in more ingress and egress points than existing conditions, the Project driveways would be designed to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists and provide safer pedestrian crossings through pedestrian signal phasing and continental crosswalks.” (DEIR, p. IV.K-63) However, the DEIR fails to explain why these driveways are necessary, how they would be designed to “minimize vehicle conflicts” and why this does not represent a conflict with Policy 15-1.1.

In addition, the proposed new driveways on Beverly Boulevard and Fairfax Avenue would conflict with the installation of bicycle lanes on those roads due to the need for openings in the bicycle lane striping, barrier, or curb to permit vehicle ingress and egress and resulting

potential for vehicle/bicycle conflicts (Complete Streets Design Guide, pp. 120, 127–128 and TAG, p. 2-18), in conflict with Policy 2.6 in Mobility Plan 2035. In general, bicyclist safety is inadequately addressed in the DEIR’s plan consistency analysis. (LLG Letter, p. 4) For example, with respect to Wilshire Community Plan Policy 11-1.2, to “[p]rovide Bikeways along Boulevards II and Avenues in the Wilshire Community Plan Area,” the DEIR offers only an unsubstantiated statement that “[t]he Project would not preclude future improvements to existing and future bicycle infrastructure and would, thus, support the initiatives to construct bikeways along Boulevards II and Avenues in the Community Plan area.” (*Id.*, p. IV.K-59) However, the DEIR does not provide any evidence to demonstrate that the various project driveways would not geometrically interfere with bikeway installation.

Policy 1.8 in Mobility Plan 2035 provides that “[t]ruck movement should be limited to the arterial street network as much as possible since these streets have the lanes and wider turning radii to accommodate these heavy large vehicles.” The Project contravenes this policy by inviting truck traffic onto The Grove Drive, designated as a neighborhood enhanced network collector street, and on multiple grade levels throughout the Project Site’s internal roadway network. (*Id.*, p. IV.K-42) However, the DEIR ignores this policy. (LLG Letter, p. 5) As discussed below, the DEIR must, at a minimum, be augmented to provide a truck maneuvering analysis for the proposed new driveways and private street network.

⁵¹ The TA and DEIR should be updated to incorporate and comply with the August 2022 update to the TAG. Regarding The Grove Drive’s Neighborhood Enhanced Network designation, the updated TAG (at page 3-19) requires that “LADOT Division of Transportation Planning and Policy (TPP) shall be consulted to identify solutions that would promote safe and comfortable access by walking and biking, while also reducing the incentive for cut-through traffic.” The analysis should be updated to reflect the results of a “a pedestrian, bicycle, and transit facilities assessment,” which must include “collecting baseline pedestrian and bicycle counts” for The Grove Drive near the intersection with Beverly Boulevard, in accordance with Caltrans’ 2019 Interim Count Methodology Guidance for the Active Transportation Program. This is especially necessary given the identified existing pedestrian safety concerns with this road segment identified in the LLG Letter, which would be exacerbated by the Project.

Response to Comment No. 35-144

The commenter’s claims regarding the consistency analysis in Section IV.K, Transportation, of the Draft EIR and the Transportation Assessment (included in Appendix M.1 of the Draft EIR) are incorrect. The consistency analysis was conducted in accordance with CEQA and was reviewed and approved by the Department of City Planning and LADOT.

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. The Draft EIR and the Transportation Assessment analyzed the potential

transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would not cause significant transportation impacts.

Pages IV.K-45 through IV.K-72 in Section IV.K, Transportation, of the Draft EIR and Chapter 4 of the Transportation Assessment include CEQA analyses for consistency with existing plans, policies, ordinances, and programs, and concluded that the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be less than significant. Refer to Response to Comment No. 9-29 regarding the analysis of hazards due to a geometric design feature or incompatible use and the conclusion that impacts would be less than significant.

Refer to Response to Comment No. 26-E.4-3 regarding the Project's consistency with Mobility Plan Policy 1.1.

Refer to Response to Comment No. 26-E.4-5 regarding the Project's consistency with Wilshire Community Plan Policy 11-2.

Refer to Response to Comment No. 28-18 regarding the Project's consistency with the Citywide Design Guideline 1. As discussed on pages IV.H-45 to IV.H-46 in Section IV.H, Land Use and Planning, of the Draft EIR, the Project would provide dedicated pedestrian entries to the Project Site along the Project Site perimeter along Beverly Boulevard, Fairfax Avenue, The Grove Drive, and the southern property line. All of the access points would be controlled with gates and/or staffed guard houses. A gate marking the central pedestrian entrance to the studio would be located along Beverly Boulevard. In addition to the Mobility Hub location, ride-share pick-up/drop-off zones could be located at Beverly Boulevard, Fairfax Avenue and/or at the Southern Shared Access Drive. Internal circulation routes, including drives, sidewalks, and pathways, would be introduced throughout the Project Site to facilitate efficient access to all buildings and parking areas from the numerous Project driveways. Additionally, the Mobility Hub located on-site would support first/last mile connections. The Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones and would include space to accommodate support uses, storage, and amenities. Such amenities may include interactive kiosks, which would provide real time transit data and manage access to shared vehicles; charging docks; and self-repair bike stations. Furthermore, the Project would include several improvements that prioritize the pedestrian experience, including landscaping, sidewalk and crosswalk improvements and bus stop improvements around the Project Site. Therefore, the Project would not conflict with this objective of the Citywide Design Guidelines.

With respect to pedestrian safety, refer to Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding the number and location of the proposed driveways at the Project Site and pedestrian safety at those driveways. As discussed therein, the number of driveways chosen is appropriate for the amount of development proposed, and all driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety. The queuing analyses also show that the security check points at each driveway would be set far enough into the Project Site that inbound queues would not extend back into the adjacent public streets nor would they block the sidewalks at the driveways nor any bike lanes on the adjacent streets. Also refer to Response to Comment Nos. 16-72 and 26-E.4-3 regarding the Project's pedestrian-oriented design and pedestrian safety.

Section IV.K, Transportation, of the Draft EIR and the Transportation Assessment also acknowledged the fact that the major streets adjacent to the Project Site are on the City's High Injury Network and that the Project worked with LADOT to develop transportation improvements that support the Vision Zero goals of the City. LADOT identified several Vision Zero improvements to be included in the Project's Transportation Improvement Program (see Topical Response No. 15, Transportation Improvement Program).

The design and operation of The Grove Drive are discussed in Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion. As discussed therein, adequate queueing capacity is provided, and driveways would be designed in accordance with LADOT design standards to ensure pedestrian safety.

The Project's consistency with Mobility Plan Policy 2.4 is analyzed on pages IV.K-48 to IV.K-49 of the Draft EIR. As concluded therein, the Project would not conflict with this policy to provide a slow speed network of locally-serving streets. Please note that the comment that the Project would provide "new private streets" is incorrect. In regard to the commenter's reference regarding their existing use of curbside space for residential and supermarket loading operations, as discussed in Response to Comment No. 26-E.4-14, the Broadcast Center Apartment's lack of enforcement of the red curb along the west side of The Grove Drive south of Beverly Boulevard and illegal loading operations cause periodic backups on Beverly Boulevard and contribute to the signal not clearing in time to process the northbound cars traveling from The Grove Drive.

Based on the absence of any policies in the Mobility Plan that conflict with the Project, the Project is not inconsistent with the Mobility Plan regardless of any future determination (approval or dismissal) of the proposed waiver of dedication. Refer to Response to Comment No. 16-76 regarding the sidewalk widths around the Project Site and the Project's consistency with the intent of the Mobility Plan. Refer to Response to

Comment No. 26-E.4-6 regarding the Project's consistency with Wilshire Community Plan Policy 15-1.1.

The bicycle lanes along Fairfax Avenue and Beverly Boulevard are called for in the Mobility Plan, but LADOT acknowledges that they are likely more than five years away from implementation. They would both require the elimination of curbside parking in front of small businesses and/or the loss of a travel lane along very congested streets. Because of the difficulty of the bike lane implementation, it was important that the Project access design did not add any impediments to their implementation. Therefore, the curb lanes and the parking lanes adjacent to the Project Site on those streets would not be disturbed in any way. Refer to page IV.K-59 of the Draft EIR regarding the Project's consistency with Wilshire Community Plan Policy 11-1.2. As stated therein, the Project would not preclude future improvements to existing and future bicycle infrastructure and would, thus, support the initiatives to construct bikeways along Boulevards II and Avenues in the Wilshire Community Plan area. Additionally, the Project would include an on-site Mobility Hub that would provide space for bike-share facilities, bicycle rentals, and other similar services that may be available in the future.

Refer to Response to Comment No. 26-165 regarding Mobility Plan Policy 1.8, which is not applicable to the Project.

Refer to Response to Comment No. 26-E.4-15 for a discussion of truck access along The Grove Drive. As discussed therein, the Project is designed so that all vehicles, including trucks, would head in and out of all designated access points, limiting their effect on surrounding streets, including The Grove Drive. Due to the adequate size of the Project driveways and turning radii, the addition of Project trucks would not result in a safety hazard.

The footnote referenced in the comment suggests that bicycle and pedestrian data should have been collected in the vicinity of the Broadcast Center Apartments and that LADOT Division of Transportation Planning and Policy (TPP) should have been contacted to develop solutions to encourage bicycle and pedestrian access. The traffic counts at all study intersections did indeed include pedestrian and bicycle counts, including the Beverly Boulevard/The Grove Drive/Spaulding Avenue intersection immediately adjacent to the Broadcast Center Apartments. The Transportation Improvement Program for the Project also includes an NTMP that will involve the LADOT TPP with the neighbors in the development of improvements and strategies to reduce cut-through trips and improve pedestrian and bicycle access for the area.

Comment No. 35-145**4. The DEIR Fails to Disclose Significant Site Plan Deficiencies That Would Result In Substantially Increased Hazards Due To Geometric Design Features.**

The DEIR also fundamentally errs by failing to study the Project's potential impacts associated with substantially increased hazards due to geometric design features in accordance with threshold (c) from Appendix G to the Guidelines.

Instead, the DEIR states that this environmental topic was scoped out in the Initial Study, which determined that the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and the impact would therefore be less than significant. (DEIR, pp. IV.K-78, VI-31–33) However, the analysis in the Initial Study was cursory and factually inconsistent with the Project analyzed in the DEIR. For instance, while the Initial Study states that the Project includes “six new vehicular entry points and eight new pedestrian gates” (p. 73), the DEIR states that the Project includes “nine vehicular access points” (p. IV.K-42) and only four new pedestrian access points (p. II-28). Given that the Initial Study failed to properly identify the Project's access points, it is no surprise that it does not specifically analyze how the proposed “multi-level circulation plan” would operate, or how the numerous grade changes and vehicular ramps to accommodate production vehicles and delivery trucks on two levels would be designed to avoid conflicts. The Initial Study does not provide any evidence that the Project would not create hazards due to geometric design features. Accordingly, the Initial Study falls far short of establishing that hazards due to a geometric design feature would be “clearly insignificant and unlikely to occur.” (See Guidelines § 15143)

As the DEIR acknowledges,

[t]he TAG includes a methodology for analyzing impacts with respect to hazardous geometric design features. For vehicle, bicycle, and pedestrian safety impacts, project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveways) are reviewed. Where project driveways would cross pedestrian facilities or bicycle facilities (e.g., bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of the consequences that could result are considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required. (DEIR, pp. IV.K-33–34)

And, as stated in the TAG:

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of access impacts require details relative to project land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction. (TAG, p. 2-19)

The DEIR fails to address the Project's compliance with any of these requirements, but in addition to stating, as discussed above, that this issue was disposed of in the Initial Study, it also "nonetheless" references analysis buried in Section 4C of the TA. (DEIR, p. IV.K-78) However, that section of the TA also fails to comply with the above-described requirements. Specifically, the TA's analysis of driveway design features ignores turning radii, truck maneuvering and line of sight for all of the new project driveways and private streets. (*Id.*, Appendix M.1, pp. 124–128) This is especially concerning as the Project includes two new driveways connecting to internal private streets that result in the complete encirclement of Broadcast Center by public and private streets. (LLG Letter, pp. 15, 17, 19) Furthermore, the DEIR and supporting TA both neglect to analyze the use of The Grove Drive curbside space that Broadcast Center residents currently use for move-ins and the Erewhon supermarket currently uses for unloading purposes. This represents additional potential for vehicle/vehicle and vehicle/pedestrian conflicts and associated safety hazards.

Response to Comment No. 35-145

The vehicular and pedestrian access points under existing conditions and the proposed Conceptual Site Plan are discussed in Section II, Project Description, of the Draft EIR. Regarding vehicular access, there are three existing active driveways¹⁴⁸ to the Project Site (including one on Beverly Boulevard and two on Fairfax Avenue) and six additional vehicular access points would be provided (refer to pages II-8 and II-26 of the Draft EIR), which is consistent with what is stated on page 73 of the Initial Study, included in Appendix A of the Draft EIR. Regarding pedestrian access, a total of eight pedestrian

¹⁴⁸ As stated on page II-8 of the Draft EIR, two of the existing driveways along Beverly Boulevard are existing curb cuts that are not currently used for access.

access points would be provided (refer to Figure II-8 on page II-28 of the Draft EIR; the Initial Study incorrectly stated that eight “new” pedestrian access points would be provided). Refer to Response to Comment No. 26-E.4-3 and Topical Response No. 12, Safety and Congestion, regarding pedestrian and vehicular access and safety.

As analyzed and concluded in the Initial Study, the Project would have a less-than-significant impact related to increased hazards due to a design feature or incompatible use, and no further analysis of this topic was required in the Draft EIR. Nonetheless, the Transportation Assessment provides a detailed discussion of Threshold T-3 in Section 4C, beginning on page 124. Refer to Response to Comment No. 9-29 regarding the CEQA impact analysis of traffic hazards. LADOT reviewed the location of the pedestrian and vehicular gates and the likely locations of the inbound/outbound gate control points, as well as the internal circulation system. LADOT carefully reviews the location of potential driveways in relation to other intersections on the public street system, the adequacy of the inbound storage prior to gate control points, and the ability of the proposed locations to meet the City’s driveway design standards. LADOT found all these elements to be acceptable in both the Initial Study and the Draft EIR Conceptual Site Plan. These features would be further reviewed during the City’s building permit process when final designs for individual buildings are submitted for construction permitting. However, any changes that could arise compared with the conceptual plans would not result in changes to the CEQA conclusions regarding geometric hazards because any changes to the design features and driveway locations would still be subject to LADOT and BOE review and approval.

Regarding truck maneuvering and access, refer to Response to Comment Nos. 26-E.4-15 and 35-148.

Regarding curbside space on The Grove Drive, the commenter does not specify the portion of the curbside along the Broadcast Center Apartment frontage. The Broadcast Center Apartment has approximately 480 feet of frontage along The Grove Drive which includes approximately 180 feet of loading and/or parking curb zone, with the remainder being either red-curb zone or ingress/egress for off-street parking for the Broadcast Center Apartments and the Erewhon supermarket. The current use of the curb on The Grove Drive for loading/parking by Broadcast Center Apartment residents and for loading at the Erewhon supermarket frequently occurs illegally in a red-curb zone. Therefore, general use of the curbside, specifically adjacent to crosswalks along Beverly Boulevard and The Grove Drive, occurs illegally. As such, both CEQA and non-CEQA analysis related to vehicular and pedestrian conflicts, as described by the commenter, would rely on the assumption of illegal and inappropriate use of the curbside. Increased enforcement of the red-curb zone could ameliorate this situation and would be enforced by LAPD and LADOT, not by Television City.

Comment No. 35-146

In addition, neither the DEIR nor TA make any attempt to evaluate whether the construction of the Project would create traffic safety hazards, an analysis that the TAG suggests should be done. The Project's anticipated construction traffic should have been analyzed with respect to potential safety hazards given the scale of the Project and potential for significant hazards associated with haul routes that Hackman could choose to place immediately adjacent to Broadcast Center.

We do not know how many bicyclists and pedestrians could be affected by these hazardous conditions as, instead of conducting pedestrian counts, the TA states that "[p]eak period traffic counts collected at the adjacent study intersections and driveway locations were reviewed for pedestrian and bicycle activity along the Project frontages." (DEIR, Appendix M.1, p. 126) Instead, specific pedestrian and bicycle counts should have been collected in accordance with Caltrans' 2019 Interim Count Methodology Guidance for Active Transportation Program.

Response to Comment No. 35-146

Please note that this comment appears to misunderstand the CEQA threshold related to hazards due to a geometric design feature or incompatible uses. Refer to Response to Comment No. 9-29, which discusses the Project's less-than-significant impacts related to hazards.

The Draft EIR comprehensively analyzed the Project's potential transportation impacts in accordance with CEQA and City policy in Section IV.K, Transportation, and concluded that impacts would be less than significant during construction of the Project. In addition, the Transportation Assessment (Appendix M.1 of the Draft EIR) included a full non-CEQA analysis of construction traffic in accordance with the TAG. As discussed therein, the Project would include a CTMP as Project Design Feature TR-PDF-1. The Project would not result in significant traffic safety hazards, as construction haul truck staging, deliveries, etc., would occur within the boundaries of the Project Site. Any activity on the Project Site periphery would include pedestrian and bicycle protection and detours as necessary. The Project would comply with all construction safety requirements and would not introduce unusual features that could result in an unusual safety hazard. The haul routes use arterial streets and have been reviewed and approved by the City. By following standard rules and implementing the CTMP, the Project would not result in safety hazards. Refer to pages IV.K-36 to IV.K-37 and IV.K-80 in Section IV.K, Transportation, of the Draft EIR; pages 179–184 of the Transportation Assessment; and Topical Response No. 14, Construction Vehicle Impacts.

The comment also claims that pedestrian and bicycle counts were not collected. However, the counts included in Appendix B of the Transportation Assessment include bicycle and pedestrian counts in 15-minute increments throughout the peak periods at each of the analyzed intersections. As shown on page IV.K-36 of the Draft EIR, specific features of the CTMP addressing pedestrian and bicycle safety include:

- Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities adjacent to Fairfax Avenue, Beverly Boulevard, and The Grove Drive, to ensure traffic safety on the public right-of-way.
- Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.

Comment No. 35-147

Another important issue to address in determining whether a project would substantially increase hazards due to a geometric design feature is the queuing that would result at the closest intersections to the Project Site as a result of the Project. However, neither the DEIR nor the Initial Study even mentions this subject.

Moreover, not even the TA's limited discussion in Section 4C of the Project's potential to substantially increase hazards due to a geometric design feature or incompatible use includes any queuing analysis. The only mention of queuing in Section 4C is a conclusory statement that "[a]ll parking control systems (*i.e.*, security booths, gate arms) would be placed on-site and would provide adequate reservoir area to avoid potential queue spillover onto adjacent roadways," and indicates that study of this issue would be deferred to the subsequent final design of the new project driveway by LADOT. (DEIR, Appendix M.1, p. 125)

However, after dodging queuing issues in the hazards discussion and suggesting a queuing analysis had not been prepared yet, a later section of the TA includes a brief queuing analysis. (*Id.*, pp. 145-146, 164-165) The TA states, based on Table 19 therein, that "the Project would contribute at least 50 feet to queues exceeding turn pockets at eight locations under Future with Project Conditions (Year 2026)." (*Id.* p. 145) This deceptively understates what is shown on Table 19. Table 19 reflects the queue length would increase by 55–190 feet during the A.M. peak hour or P.M. peak hour with respect to **16** turning movements. (*Id.*, pp. 164-165)

We note in particular that there is an existing queue length of 930 feet for northbound traffic approaching Beverly Boulevard on The Grove Drive. According to the TA, the Project would increase that queue length by 90 feet, for a total queue length of 1,020 feet. (*Id.*, pp. 145–146, 164–165). It is apparent, however, that the TA significantly understates the

increase in queue length due to the multiple ways in which the TA undercounts project trip generation, as previously discussed. Moreover, as discussed in the LLG Letter, even if the TA accurately states the increase in queue length, the resulting queue would block access to (1) the Project's new six-lane private street that would intersect with The Grove Drive project driveway and (2) the existing southern parking entrance/exit for the Broadcast Center building. The Broadcast Center parking entrance/exit would also be blocked by southbound The Grove Drive traffic approaching the intersection where The Grove Drive and the Project's new six-lane private street would meet based on the vehicle queuing data provided in Appendix G to the Transportation Assessment. (LLG Letter, p. 17)

These queues would result in hazards, including, but not limited to, vehicles being trapped within the intersection, pedestrians not being able to use crosswalks, motorists attempting to squeeze through vehicle queues to enter or exit driveways, and motorists failing to observe or yield to oncoming traffic or pedestrians using sidewalks and crosswalks. There is no explanation provided for why the TA, not to mention the DEIR, fail to analyze these potential hazards associated with geometric design features.

As discussed in the LLG Letter, the queueing analysis in the TA is further inadequate because it fails to account for vehicle trips associated with audience member attendance at productions in the numerous sound stages contemplated in the DEIR Conceptual Plan and DEIR Conceptual Program. As LLG demonstrates, when those trips are factored in, the design queue length for arriving vehicles at the proposed The Grove Drive security gate would be 572 feet, whereas the security gates are only proposed to be set back 100 feet from The Grove Drive. This means that vehicles would queue onto The Grove Drive, well beyond the intersection with the proposed Project driveway and six-lane private street, which would further impact vehicle traffic flow and safety. (LLG Letter, pp. 19–21)

As shown on Table 19 in the TA, there are numerous other intersections where project-related traffic would cause vehicle queues to exceed available storage space in turn pockets, which would result in additional roadway hazards that are not disclosed in the DEIR. As one example, at the Fairfax Avenue/Melrose Avenue intersection, the 170-foot turn pocket is sufficient under the future without project condition, but the Project would cause the P.M. peak hour queue length to increase from 140 feet to **240** feet, which would significantly exceed the 170-foot storage capacity. (*Id.*, p. 164) In addition, the Project would substantially increase the queue length at other intersections that already exceed the turn pocket lengths. For example, at the Fairfax Avenue/Beverly Boulevard intersection, the A.M. peak hour queue length of 373 feet for a westbound left-turn already exceeds the turn pocket length of 140 feet, but the Project would significantly increase that queue length by at least **157** feet, for a total queue length of 530 feet. (*Id.*) Neither the TA, the DEIR nor the Initial Study has nothing to say about this, however.

In addition, the proposed travel lane geometry for the new six-lane private street, where it meets The Grove Drive, represents an additional geometric design hazard that is entirely neglected in the TA and DEIR. The conceptual striping plan for the intersection, buried in Appendix H to the TA (non-numbered, but page 665 of overall 787-page TA), shows that southbound traffic on The Grove Drive would be directed into oncoming northbound traffic, as further described in the LLG Letter. (LLG Letter, p. 18–19) In other words, the proposed new left-turn lane on northbound The Grove Drive at the intersection with the new private street lines up directly with the oncoming southbound through lane. To avoid a collision, southbound through traffic would need to transition approximately 10 feet across the intersection. Vehicles traveling southbound on The Grove Drive would have to swerve laterally 10 feet through the intersection to avoid head-on collisions with northbound vehicles turning left onto the new private street. The conceptual striping plan also interferes with an existing passenger loading area adjacent to the Holocaust Museum and Pan Pacific Park. As proposed, the drop-off lane would no longer be able to safely function because tour bus operators attempting to exit the drop-off lane would be in the middle of the intersection and not know at any time which movement (e.g., The Grove Drive traffic or Project driveway traffic) has a green light. (LLG Letter, p. 19)

Response to Comment No. 35-147

Please note that this comment appears to misunderstand the CEQA threshold related to hazards due to a geometric design feature or incompatible uses. Refer to Response to Comment No. 9-29, which discusses the Project's less-than-significant impacts related to hazards.

The second paragraph of the comment suggests that the issue of queue lengths behind the inbound control gates was not investigated and that the matter would be improperly deferred to a later date. This statement is not correct. Figure 25 on page 158 of the Transportation Assessment (included in Appendix M.1 of the Draft EIR) shows the inbound and outbound peak hour volumes at each Project driveway. These volumes were used to conduct the non-CEQA queuing analysis that established the distances from the public streets for the location of the inbound gates. Refer to Sections A, Queuing at Project Driveways, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, for a detailed discussion of the non-CEQA queueing analysis at the Project gates and the location of the control gates at each major intersection and pedestrian safety. Also refer to Response to Comment No. 26-E.4-3 regarding pedestrian safety. The comment regarding deferred analysis is incorrect, as queuing was analyzed in the Transportation Assessment in accordance with the TAG, and queuing and driver delay are not CEQA impacts.

The non-CEQA effects of the Project on both driveway and intersection queuing were fully disclosed and evaluated in the Transportation Assessment. As discussed on

pages 145 to 146 of the Transportation Assessment, the Project is projected to result in a queuing effect at eight study intersections, and Table 19 on pages 164 to 165 of the Transportation Assessment shows the Project's effect on 16 individual turn movements at the eight study intersections in one peak hour. Contrary to the commenter's claim, these Project effects are fully disclosed in the Transportation Assessment.

The comment also discusses potential queuing at the intersection of Beverly Boulevard and The Grove Drive, which again is fully disclosed in Table 19 of the Transportation Assessment as described above. The additional queues along The Grove Drive caused by Project vehicles do not represent a safety or operational effect because The Grove Drive Project entrance would be signalized, and if the northbound queue from Beverly Boulevard reaches the Project driveway, the traffic signal will regulate vehicles leaving the Project Site until capacity on The Grove Drive is available to accommodate the additional Project vehicles.

The comment incorrectly claims that audience trips were not included in the Project trip generation, and, therefore, the trips in the Transportation Assessment are undercounted, and the potential Project impacts are understated. Refer to Response to Comment No. 35-39, above, as well as Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a thorough discussion of visitor/audience trips.

The comment regarding the purported inadequacy of the inbound storage length at The Grove Drive Project driveway is based on the incorrect assumption that the trip generation of the Project is underestimated because it does not include audience trips. As discussed in Topical Response No. 10, Trip Generation, the Project trip generation does indeed account for visitor and audience trips and therefore the queuing analysis for the Project driveways as presented in Topical Response No. 12, Safety and Congestion, represents the correct estimation of queues and storage requirements at the Project driveways.

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-14 regarding queuing along The Grove Drive. Also refer to Figure II-14 on page II-1153 for a more refined version of the proposed striping along The Grove Drive and a clearer presentation of the lane assignments and lane flow on the street. This figure shows the restriping of The Grove Drive that accommodates the northbound left-turn pocket at the Project entrance that does not require the severe lane shifting for southbound through traffic as described in the comment. The Project entrance off The Grove Drive will not be a "six-lane private street" as described in the comment. Rather, a four- to five-lane driveway will intersect with The Grove Drive at a new traffic signal. The bus bay for the Holocaust Museum would be incorporated into the intersection and traffic signal design that allows buses leaving the loading bay to see the signal indications and pull safely into traffic. The final design of the

driveway and intersection would be subject to detailed review by City staff as part of the building permit process to ensure safety and compliance with design standards.

Comment No. 35-148

The LLG Letter also demonstrates that the DEIR's failure to provide truck maneuvering analyses, as required by the TAG, is a critical failure given that standard trucks would not be able to safely maneuver through the intersection of the new six-lane private street with The Grove Drive. (LLG Letter, p. 17-18) Another of the Project's new private streets, the one that would border the western boundary of the BC Site, also represents a hazard with respect to truck turning movements, especially given sight line impacts resulting from the existing multi-story residential structure. For example, trucks turning into this proposed private street from Beverly Boulevard out of this proposed private street onto Beverly Boulevard may be impeded from seeing or yielding to oncoming vehicle and pedestrian traffic due to the lack of visibility resulting from the adjacent, opaque structure. Truck maneuvering analyses should be prepared for the Project addressing all driveways and proposed onsite streets to be used for truck transportation.

Response to Comment No. 35-148

The graphics referred to in this comment are inaccurate portrayals of truck operations, as it shows trucks turning right from the right-most lane at a sharp angle when, in reality, large trucks swing wide to the left to make right turns at corners. While this maneuver is temporarily inconvenient for other vehicles on the road, it is the appropriate and safe way for large trucks to turn into and out of commercial driveways. These movements are expected, as codified in State and City guidelines. The *California Commercial Driver Handbook* (California Department of Motor Vehicles, 2019-2021) states in Section 2.7.6, Space for Turns, that drivers of large vehicles may encroach into other vehicle lanes. The *City of Los Angeles Supplemental Street Design Guide* (Los Angeles Bureau of Engineering & LADOT, May 2020) states on page 25, "The intersection corner [radius] should be designed so that the most common vehicle can negotiate a turn without encroachment into an adjacent or oncoming motor vehicle lane." (Emphasis in original text.) It further states on page 26, "Large trucks are assumed to be able to use adjacent lanes on the departing and receiving street at all intersections."

These movements are made out of necessity by experienced drivers with extremely limited frequency compared to passenger vehicle movements, and they are not considered to be an unusual safety hazard by LADOT. The infrequent inconvenience of maneuvers by large trucks is far outweighed by the pedestrian safety benefits and physical space efficiency of designing commercial driveways at a normal scale. Figure II-11 on page II-1148 associated with Response to Comment No. 26-E.4-15 provides an accurate

depiction of how large trucks can access the Project Site via the driveway at The Grove Drive.

Refer to Response to Comment No. 26-E.4-15 regarding truck maneuvering and access. It is important to note that large trucks already use The Grove Drive. The Grove shopping and entertainment center has a loading dock located on The Grove Drive south of the Project Site, which requires large delivery trucks to back in from the street. When those trucks arrive and depart, they block all southbound travel lanes and, in some cases, all northbound travel lanes at the same time. Traffic counts with vehicle classifications were conducted at the loading dock and found that trucks (not associated with the studio) currently use it during business hours. Accordingly, truck maneuvering, which is the issue specifically raised in the comment, already occurs under existing conditions.

The Project, on the other hand, is designed so that all vehicles including trucks would head in and out of all designated access points, limiting their effect on surrounding streets, including The Grove Drive.

In addition, there are three proposed driveways on Beverly Boulevard, all three of which exist today (though two are not in use). The driveway at Genesee Avenue would continue to be signalized and provide full access (i.e., left- and right-turns in and out). The other two driveways, including the one adjacent to the Broadcast Center Apartments, would remain unsignalized and be restricted to right-turns in and out only. Therefore, should the driveway adjacent to the Broadcast Center Apartments be used for truck access, those movements would only be right turns, and the driver would have sufficient visibility to see oncoming traffic from the west. As discussed in Response to Comment No. 9-29, geometric design hazards associated with Project access were analyzed in the Initial Study and found to be less than significant.

Comment No. 35-149

The DEIR and supporting TA also fail to analyze hazards associated with the substantial, multi-level internal roadway network contemplated as part of the Project, which includes potential conflicts between vehicles and pedestrians at multiple proposed intersections. In fact, as previously discussed, the DEIR and TA disclose little about this multi-level network and do not appear to include a single graphic that illustrates this multi-level internal roadway network. Moreover, even if the DEIR or TA had included meaningful information regarding the contemplated multi-level network, it would only be illustrative and Hackman would have the discretion to place the onsite roadway network anywhere it chose. For example, the DEIR states that “[w]hile some of the circulation routes are depicted in the conceptual site plan, some would be partially subterranean and/or internal to the new buildings, thus providing internal connectivity between production spaces and supporting uses.” (DEIR, p. II-26) The safety hazards presented by the Project could potentially be

more significant than (barely) presented in the DEIR Conceptual Plan that is the foundation of the DEIR's analysis.

Therefore, the identified internal circulation is not a worst-case scenario as there is no limit on where Hackman could locate onsite streets, driveways and parking areas. Once the Specific Plan is adopted, Hackman could change the internal roadway network, or even the arrangement of proposed buildings, structures and uses on the Project Site, without further environmental review. If it did so, that would result in greater or lesser use of particular project driveways and private streets, calling into further question the validity of the limited and inadequate intersection LOS and queueing analysis that were conducted for the Project, but not disclosed in the DEIR text.

Response to Comment No. 35-149

Project access, circulation, and parking are discussed in detail on pages II-25 to II-30 in Section II, Project Description, of the Draft EIR. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. The Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

The Project driveways would not result in hazards due to a geometric design feature; refer to Response to Comment No. 9-29. All driveways would be designed in accordance with applicable regulatory standards and subject to review and approval by LADOT. The use of individual driveways would be influenced by the direction from which traffic approaches the Project Site which, in most cases, would be influenced by the residential location of the Project employees. As described earlier, the location and distribution of parking would be spread out throughout the Project Site, and the internal circulation system has been designed to provide access to all the on-site parking regardless of the point of entry into the Project Site. Thus, the distribution of Project trips in and out of the Project Site driveways is not likely to be meaningfully different than that summarized in the Draft EIR and the Transportation Assessment included as Appendix M.1 of the Draft EIR. Further, all ramping associated with the multi-level internal circulation system would be internal to the Project Site and would be designed so as to prevent any queuing or congestion impacts that would affect the adjacent public street system.

Refer to Topical Response No. 12, Safety and Congestion, regarding the non-CEQA queuing and LOS analysis in the Transportation Assessment.

Comment No. 35-150**5. The Project's Emergency Access Impact Should Not Have Been Scoped Out of the DEIR.**

The DEIR further and significantly errs by failing to study the Project's potential impacts associated with inadequate emergency access in accordance with threshold (d) from Appendix G to the Guidelines. Instead, the DEIR states that this environmental topic was scoped out in the Initial Study, which determined that the Project would not result in inadequate emergency access and the impact would therefore be less than significant. (DEIR, pp. IV.K-80, VI-31–33)

However, the analysis in the Initial Study was cursory and failed to address key issues associated with the Project's potential impacts on emergency access. For instance, the Initial Study acknowledges that Beverly Boulevard, adjacent to the Project Site, is a designated disaster route. (DEIR, Appendix A, p. 74) The Initial Study states that Project construction may result in lane closures on this route. (*Id.*) However, the only explanation for why this impact would be clearly insignificant is a brief statement that "the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access." (*Id.* pp. 74–75) The Initial Study does not include any analysis demonstrating that remaining travel lanes would provide sufficient disaster route capacity during required lane closures. In addition, as construction traffic is not modelled anywhere in the Initial Study, DEIR or TA, there is no evidence provided that construction traffic would not impede emergency access.

With regard to emergency access impacts from Project operation, the Initial Study states only that "primary access to the Project Site would continue to be provided from the adjacent roadways" and "the Project would comply with LAFD access requirements." (*Id.*, p. 75) Again, however, the Initial Study fails to address key issues, such as potential emergency access impacts related to vehicle queues on surrounding roadways or how emergency vehicles would navigate the proposed internal roadway network. (LLG Letter, pp. 24–25) In particular, the Initial Study does not explain why thousands of feet of additional vehicle queues on surrounding roadways, on top of significant existing queue lengths, which would substantially impede traffic flow, including at the new primary entrance to the Project Site off The Grove Drive and a primary entrance to the Broadcast Center, would not create meaningful emergency access constraints.

Also, as there is no special event management plan called for, how will special event traffic impact emergency access? What if there is an emergency at a live audience taping requiring rapid police deployment, but all the surrounding roads are jammed? The Initial Study has nothing to say on this topic.

Accordingly, the Initial Study falls far short of establishing that inadequate emergency access would be “clearly insignificant and unlikely to occur” and this impact therefore should have been evaluated in the DEIR. (See Guidelines§ 15143)

While the Project’s impact on emergency access was scoped out in the Initial Study, the DEIR adds one new point. It references Project Design Feature TR-PDF-1 (DEIR, p. IV.K-80), which requires, in the future, “[a] detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, [which] will be prepared and submitted to the City for review and approval prior to commencing construction.” (*Id.* p. IV.K-36) In other words, notwithstanding that the Project is very large and complex development that could be constructed over a 20-year period and would involve major alterations to the onsite and offsite circulation systems, the DEIR defers all review of the Project’s construction traffic impacts, including how construction would impact emergency access and pedestrian and vehicular safety.

The DEIR’s reliance on a future construction traffic management plan represents an impermissible deferral of environmental review of the Project’s construction traffic impacts, including its potential impact on emergency access, as well as deferral to formulate feasible mitigation for any significant construction traffic impact. Furthermore, it seems apparent that the reason the preparers of the DEIR have been forced to unlawfully defer review of the Project’s construction traffic impacts is that Hackman may develop a project that is much different from what is contemplated in the DEIR Conceptual Plan. While Project Design Feature TR-PDF-1 includes a list of the type of generic provisions that could be included in the construction traffic plan “as appropriate,” it acknowledges that the contents of the plan “will be based on the nature and timing of the specific construction activities.” (*Id.*) So, the public and decisionmakers are left with no real idea of what would be developed on the Project Site, what construction traffic impacts the Project would actually have, how those impacts would specifically be addressed in the future construction traffic management plan, and whether that plan would actually be effective. Once again, the lack of a stable project description has made it impossible to meaningfully evaluate the Project’s impacts.

Response to Comment No. 35-150

Refer to pages 75 and 76 of the Initial Study included as Appendix A of the Draft EIR, as well as page IV.K-80 of Section IV.K, Transportation, of the Draft EIR. As discussed therein, impacts would be less than significant without mitigation. Thus, analysis of emergency access was not deferred.

Refer also to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for a discussion of the Project’s effects on emergency access. As discussed therein, and as detailed in pages 3-4 of the Transportation Assessment included

in Appendix M.1 of the Draft EIR, the Conceptual Site Plan includes both access and internal circulation considerations that would enhance emergency access to the Project Site. New and redesigned Project driveways would provide increased emergency access to the Project Site with new signalized driveways provided along both Fairfax Avenue and The Grove Drive and an enhanced signalized driveway along Beverly Boulevard. Thus, emergency access to the Project Site via Beverly Boulevard, 3rd Street, and Fairfax Avenue would be maintained and improved. As also discussed in Section D of Topical Response No. 12, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations serving the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Also refer to Topical Response No. 10, Trip Generation, regarding how special events would not be regulated by the Project's Specific Plan and would continue to be regulated on a case-by-case basis by City departments consistent with existing conditions.

The comment incorrectly implies that the Project would cause thousands of feet of additional vehicle queues. Refer to Topical Response No. 12, Safety and Congestion, regarding queuing.

Refer to Topical Response No. 14, Construction Vehicle Impacts, for detailed information on construction traffic and the CTMP. Project construction activities would primarily occur within the Project Site boundaries. Construction lane closures are temporary in nature and would be subject to the requirements of the CTMP (Project Design Feature TR-PDF-1; see pages IV.K-36 to IV.K-37 in Section IV.K of the Draft EIR). The CTMP would be reviewed and approved by the City prior to commencing construction, and would include at a minimum all of the measures identified in Project Design Feature TR-PDF-1. These types of measures are common to CTMPs for development projects citywide and do not reflect a failure to disclose potential construction traffic impacts. As discussed in Response to Comment No. 35-146, the Transportation Assessment includes a complete analysis of construction traffic as part of its non-CEQA analysis. Refer to Section 5D, pages 179 through 184 of the Transportation Assessment. The conclusion of the analysis is that there are less-than-significant impacts resulting from construction activities, and, therefore, there is no deferral of mitigation.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Project Description is accurate, stable and finite, and the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

Comment No. 35-151**R. The DEIR's Analysis of the Project's Tribal Cultural Resources Impact Is Inadequate.**

The DEIR's tribal cultural resources analysis is inadequate because proper consultation with Native American tribes did not occur and the DEIR relies on the flawed TCR Report.

1. The Tribal Consultation Conducted for the Project Is Inadequate.

The tribal consultation conducted for the Project is inadequate for three reasons. First, the City notified the tribes on the City's AB 52 Consultation Contact List, but this does not satisfy the best practices promulgated by the State of California and NAHC for AB 52 consultation. (SRI Letter, p. 9) In this case, consultation consisted of sending a notification letter to those tribes listed on the City's AB 52 Consultation Contact List in July 2021—the height of the COVID-19 pandemic when tribal representatives were likely working remotely and therefore may not have received the notices. (*Id.*) While the AB 52 notices were sent through U.S. Postal Service Certified Mail as shown in the "Delivery Confirmations" provided in the TCR Report, the DEIR provides no evidence that the notices were successfully delivered by the mail carrier and received by the intended recipient, as a signature from the recipient would have been required at the time of delivery to complete the electronic verification.⁵² The U.S. Postal Service website provides electronic verification that an article was delivered or that a delivery attempt was made. (*Id.*)

Based on an online search using the USPS tracking numbers shown in the TCR Report, **at least five of the 10 contacts** did not receive the notices, including San Fernando Band of Mission Indians (Ms. Donna Yocum, Chairperson), Torres Martinez Desert Cahuilla Indians (Mr. Thomas Torte, Chairperson), Fernandeno Tataviam Band of Mission Indians (Mr. Rudy Ortega, Tribal President), Gabrieleno Band of Mission Indians—Kitz Nation (Mr. Andrew Salas, Chairperson), and Soboba Band of Luiseno Indians (Mr. Isaiah Vivanco, Chairperson). (See **Exhibit 7** attached hereto) We note that while the USPS Tracking shows the notices to the Torres Martinez Desert Cahuilla Indians and San Fernando Band of Mission Indians as "delivered" to the respective P.O. Box addresses, the tracking does not confirm that the "Individual Picked Up at Postal Facility" as is the case for the other P.O. Box addresses for the tribal contacts, such as the Gabrielino Tongva Indians of California P.O. Box shown in **Exhibit 8**. Thus, we reasonably assume that Mr. Torte and Ms. Yocum have yet to retrieve the AB 52 notice from their P.O. Boxes.

As discussed in the SRI Letter, the 2005 State of California Tribal Consultation Guidelines Supplement to General Plan Guidelines state that written correspondence requesting consultation with a tribe may not be sufficient and that telephone calls or more direct forms of contact may be required. (SRI Letter, p. 10) Even the NAHC's Tribal Consultation Under AB52: Requirements and Best Practices recommends that lead agencies consult

with tribes in advance of AB 52 consultation and to send more than one consultation notice. (*Id.*) In fact, standard practice, according to SRI, is to follow up with email notification after notice letters are mailed, and then telephone calls with each tribal entity if the letters and emails go unanswered, which was the case here. (*Id.*) The DEIR does not provide any indication that this standard practice was followed. (*Id.*)

⁵² See United States Postal Service, Frequently Asked Questions, “What is Certified Mail?” Available at: <https://faq.usps.com/s/article/What-is-Certified-Mail>. Accessed: September 2022.

Response to Comment No. 35-151

Refer to Response to Comment No. 26-E.2-54 regarding the consideration of constraints posed by the pandemic.

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the tribal outreach efforts completed for the Project, including notification to tribal contacts from the NAHC’s list returned with the SLF, the means by which tribal consultation requirements were fulfilled pursuant to PRC Section 21080.3.1, as amended by AB 52.

Comment No. 35-152

Second, because the Project is being implemented through a Specific Plan and General Plan Amendment, tribal consultation following the requirements of SB 18 is also required under State law. (*Id.*) The SB 18 consultation is not the same as AB 52 consultation or the NAHC Sacred Lands Files Search process. (*Id.*) SB 18 is subject to its own schedule and timeline for tribes to respond to the notification.⁵³ (*Id.*) Under SB 18, the City would send the Specific Plan proposal information to the NAHC and request contact information for tribes with traditional lands or places located in the geographic area affected by proposed changes. Cal. Gov’t Code § 65352.3(a)(1). The City is required to consult with federally recognized California Native American tribes, or non-federally recognized California Native American tribes, that are within the local government’s jurisdiction, are on the contact list maintained by the NAE-IC, and would be affected by the proposed Specific Plan. (*Id.* § 65352.3) Once the City contacts the tribes about the opportunity to consult, the tribes have 90 days to request consultation. (*Id.* § 65352.3(a)(2)) As such, in addition to correcting its noticing error under AB 52 discussed above, the City must also comply with its separate SB 18 obligations and correct the DEIR with any new information obtained during its SB 18 consultation.

Third, as discussed in the SRI Letter, although the NAHC Sacred Lands Files search did not disclose any tribal cultural resources within the Project Site, follow-up outreach with affiliated tribes is necessary because NAHC states that negative results do not negate the possibility of those type of resources being present and recommends contacting tribes and individuals affiliated with the area. (SRI Letter, p. 8) In this case, no tribal outreach was

conducted, as recommended by NAHC. (*Id.*) Instead, the TCR Report relied on the results of the AB 52 consultation, which as demonstrated above was itself flawed. In addition, the AB 52 Consultation Contact List is separate from the Sacred Lands Files list. (*Id.*) Here, although the named tribes are the same for both lists, three individuals named by the NAHC in the Sacred Lands Files search are not named on the AB 52 Consultation Contact List and were not contacted. (*Id.*)

⁵³ See Governor's Office of Planning and Research published guidance summarizing the differences in tribal consultation process and timeline for SB 18 and AB 52. Available at: https://opr.ca.gov/cega/docs/20220?23-Tribal_Consultation_Checklist.pdf. Accessed: September 2022.

Response to Comment No. 35-152

Refer to Response to Comment Nos. 26-E.2-14 and 26-E.2-17 regarding the tribal outreach efforts completed for the Project, including outreach to tribal contacts from the NAHC's list returned with the SLF, the means by which tribal consultation requirements were fulfilled pursuant to PRC Section 21080.3.1 (as amended by AB 52), and why the requirements of SB 18 do not apply.

Comment No. 35-153

2. The TCR Report is Inadequate as an Informational Document.

As previously discussed in the archaeological resources discussion, the cultural setting section in the TCR Report is inadequate for numerous reasons. "The discussion of the prehistoric period: (1) focuses on the wrong region, (2) contains outdated information, (3) ignores recent research, (4) fails to cite many well-known scholarly studies and reports, and (5) contains omissions and incomplete and wrong information." (SRI Letter, p. 10) Moreover, as previously discussed above, the TCR Report omits critical Project-specific history related to Native American use of the Project Site and surrounding areas during the historical period, including the Gilmore Adobe, which is located approximately 130 feet from the southern boundary of the Project Site. (*Id.*)

Response to Comment No. 35-153

The comments regarding the inadequacy of the Tribal Cultural Resources Report (Appendix C.2 of the Draft EIR) are incorrect and not supported by evidence. Refer to Response to Comment Nos. 13-7 and 26-42 regarding the issue of the regional historical context, the adequacy of the background research, identification, and analysis for archaeological and tribal cultural resources, including the discussion of the Gilmore Adobe.

Refer to Resource to Comment No. 26-E.2-12 regarding the issue of Native American labor, alternative source materials omitted from the Tribal Cultural Resources

Report, and discrepancies that may exist concerning minor details for topics that are either matters of scholarly debate or are only indirectly related to the background setting.

Comment No. 35-154

S. The DEIR's Analysis of the Project's Utility and Service Systems Impacts Is Inadequate.

1. The DEIR's Analysis of Water Supply and Infrastructure Impacts Is Inadequate.

The DEIR did not adequately analyze significant environmental effects associated with the Project's potential to result in the relocation or construction of new or expanded water supply infrastructure.

For example, the DEIR did not address potential environmental impacts associated with the installation of water distribution lines and related earthwork activities. (DEIR, pp. IV.M.1-31–32) Even though the DEIR acknowledges that trenching would involve “off-site work associated with connections to the public main lines,” the DEIR does not even attempt to calculate the distances to nearby sensitive receptors from which construction equipment would be operating. (*Id.*, p. IV.M.1-32) Construction activities associated with water distribution lines could cause potentially significant noise and air quality impacts that the DEIR did not evaluate.

Response to Comment No. 35-154

As discussed in Response to Comment No. 26-175, the Draft EIR fully and adequately analyzed water infrastructure on pages IV.M.1-31 to IV.M.1-34 of the Draft EIR. As stated therein, the Project would not require or result in the relocation or construction of new off-site water facilities or expansion of existing facilities that could cause a significant environmental effect. Note that the commenter only cites a portion of the discussion of water infrastructure. The full text on pages IV.M.1-31 and IV.M.1-32 of the Draft EIR that includes the citation from the commenter states (emphasis added):

*Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below ground and would be limited to on-site water distribution and **minor** off-site work associated with connections to the public main lines. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of any proposed ground disturbance activities to avoid water lines and disruption of water service. **LADWP would review and approve all appropriate connection requirements, pipe depths, and***

connection location(s). *The limited off-site construction activities could also temporarily affect access in adjacent rights-of-way. However, as discussed Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan (Project Design Feature TR-PDF-1) would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. **Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure that emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way.***

Any trenching or grading for the new on-site water and wastewater lines and other utilities would occur as part of Project grading and foundation activities. Equipment and labor for these activities have been fully accounted for in the impact analysis in the Draft EIR, including the air quality and noise analyses. Refer to Appendix FEIR-8 of this Final EIR for the detailed labor and equipment assumptions used in the air quality and noise analyses. In addition, as stated above and in the Draft EIR, any minor off-site work associated with utility connections would be completed in accordance with agency oversight, and the Project's Construction Traffic Management Plan (Project Design Feature TR-PDF-1) would ensure that adequate and safe access remains available within and near the Project Site during construction activities.

As noted above, the precise locations of the water and sewer line and other utility connections would be determined by the utility provider during the regulatory building permit process. Based on the existing main water and sewer lines, the future offsite connections for the Project would be located along Fairfax Avenue and/or Beverly Boulevard adjacent to the Project Site. These future offsite connections for the Project would be located a minimum of 75 feet from offsite sensitive receptors. Construction associated with the offsite utility connection would involve limited pieces of equipment (i.e., a concrete saw, a backhoe, and a dump truck) and would occur for a very short duration (i.e., a few days). Based on the calculations provided in Appendix FEIR-16 of this Final EIR, noise levels associated with the connections would be approximately 71.7 dBA (L_{eq}) at the nearest sensitive receptors along Fairfax Avenue (at receptor R8) and Beverly Boulevard (at receptor R3), which would be below the 5-dBA significance threshold (at receptors R3 and R8). Therefore, noise impacts associated with the off-site utility connections would be less than significant.

Comment No. 35-155

With respect to the Project's estimated water demand, the DEIR claims that "5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate." (*Id.*, pp. IV.M.1-35–36 [Table IV.M.1-5, noted]) However, this

claim is inconsistent with, and undermined by, the approach taken in Section IV.K (Transportation) of the DEIR, in which “for the purposes of providing a conservative analysis, the approximately 20,000 square feet of retail uses were input into the VMT Calculator as a high-turnover restaurant land use.” (*Id.*, p. IV.K-73) It is clear that the Project’s water supply and infrastructure analysis did not in fact take a conservative approach in analyzing only 5,000 square feet of restaurant uses. According to the water demand rate provided in the DEIR, an additional 15,000 square feet of restaurant uses (and 15,000 fewer square feet of retail uses) would result in an additional 29,685 gallons per day of water demand, representing an approximately 11% increase in the overall net Project water demand.

In its estimate of water demand, the DEIR includes 194,600 square feet of basecamp area, stating that “[b]asecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged.” (*Id.*, pp. IV.M.1-35–36 [Table IV.M.1-5, note e]) The estimate also includes 36,000 square feet of Mobility Hub area. (*Id.*, p. IV.M.1-35) It is not clear where these figures comes from, as the DEIR does not otherwise provide square footages for basecamp areas or the Mobility Hub. Moreover, the DEIR fails to explain why 194,600 square feet of basecamp area and 36,000 square feet of Mobility Hub area are included in the water demand estimate, but the rest of the considerable floor area in the two planned production levels is ignored. The DEIR should have studied water demand associated with all Project components.

Response to Comment No. 35-155

As specified in the WSA, Table II-2 of Section II, Project Description, of the Draft EIR and in the water and wastewater analyses in the Draft EIR, the Project includes 20,000 square feet of retail uses, of which up to 5,000 square feet could be comprised of restaurant uses. Refer to Response to Comment No. 35-44 regarding how all of the basecamp and Mobility Hub areas located below Project Grade have been fully evaluated in the EIR.

As such, restaurant uses have not been underestimated in the WSA. As stated in the previous paragraph, up to 5,000 square feet of the Project’s total retail floor area of 20,000 square feet was assumed to include ancillary restaurant/commissary uses. As stated on page IV.K-35 in Section IV.K, Transportation, of the Draft EIR, the Transportation Assessment and VMT Calculator assumed all 20,000 square feet to be high-turnover restaurant to present a conservative analysis because this land use generates more trips than a standard retail land use. Therefore, this VMT analysis is overly conservative, as the proposed development program would be limited to 5,000 square feet of restaurant uses as discussed above, which is reflected in the WSA. Additionally, the proposed Specific Plan would include a regulatory framework for implementation of the Project and a discretionary process that includes additional CEQA compliance review for future Project changes that

would potentially exceed the environmental impacts analyzed in the EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 35-156

2. The DEIR's Analysis of Wastewater Impacts Is Inadequate.

The DEIR did not adequately analyze significant environmental effects associated with the Project's potential to result in the relocation or construction of new or expanded wastewater infrastructure.

For example, the DEIR did not analyze potential environmental impacts associated with the installation of sewer line connections and related earthwork activities. (DEIR, p. IV.M.2-12) Even though the DEIR acknowledges that trenching would involve "off-site work that may affect services from the existing sewer lines in the vicinity of the Project Site," the DEIR did not even attempt to calculate the distances to nearby sensitive receptors from which construction equipment would be operating. (*Id.*) Construction activities associated with sewer line connections would cause potentially significant noise and air quality impacts that the DEIR did not evaluate.

Response to Comment No. 35-156

Contrary to the commenter's statement, the Draft EIR fully and adequately analyzed wastewater infrastructure on pages IV.M.2-11 to IV.M.2-18 of the Draft EIR. As stated therein, the Project would not require or result in the relocation or construction of new off-site wastewater conveyance or treatment facilities or expansion of existing facilities that could cause a significant environmental effect. With regard to construction-related impacts associated with wastewater, the full context of the text quoted from the commenter on page IV.M.2-12 of the Draft EIR is as follows.

The Project would include the construction of new sewer line connections to connect the proposed buildings to the main sewer infrastructure system in the streets surrounding the Project Site. The new sewer connections would collect wastewater from the Project Site and connect to the existing public sewer laterals. Construction impacts associated with these new sewer line connections would primarily be confined to trenching for the placement of pipe and connection into the existing main sewer lines. Any off-site work that may affect services from the existing sewer lines in the vicinity of the Project Site would be coordinated with the City of Los Angeles Bureau of Engineering (BOE). BOE would establish the appropriate connection requirements, pipe depths, and connection location(s). In addition, as set forth in Project Design Feature TR-PDF-1 included in Section IV.K, Transportation, of this Draft EIR,

a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. The Construction Traffic Management Plan would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access in particular, throughout the construction period. All infrastructure installation impacts would be of a relatively short-term duration and would cease to occur once the installation is complete. As such, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure.

Any trenching or grading for the new on-site lines would occur as part of Project grading and foundation activities. Equipment and labor for these activities has been fully accounted for in the impact analysis in the Draft EIR, including the air quality and noise analyses included in Sections IV.A, Air Quality, and IV.I, Noise, of the Draft EIR. Refer to Appendix FEIR-8 of this Final EIR for a detailed discussion of the equipment and labor assumptions used in the Draft EIR. In addition, as stated in the Draft EIR text included above, any off-site work associated with the connections would be completed in accordance with BOE requirements and the Project's Construction Traffic Management Plan (Project Design Feature TR-PDF-1).

As discussed in Response to Comment No. 35-154, above, construction associated with an offsite utility connection would be completed with agency oversight and would involve limited pieces of equipment (i.e., a concrete saw, a backhoe, and a dump truck) and would occur for a very short duration (i.e., a few days). Based on the calculations provided in Appendix FEIR-16 of this Final EIR, noise levels associated with the connections would be approximately 71.7 dBA (L_{eq}) at the nearest sensitive receptors along Fairfax Avenue (at receptor R8) and Beverly Boulevard (at receptor R3), which would be below the 5-dBA significance threshold (at receptors R3 and R8). Therefore, noise impacts associated with the offsite utility connections would be less than significant.

Comment No. 35-157

With respect to the Project's estimated wastewater generation, the DEIR claims that "5,000 square feet of the retail uses are assumed to consist of restaurant uses with 334 seats for a conservative estimate." (DEIR, pp. IV.M.2-14–15 [Table IV.M.2-2, note e]) However, this claim is inconsistent with, and undermined by, the approach taken in Section IV.K (Transportation) of the DEIR, in which "for the purposes of providing a conservative analysis, the approximately 20,000 square feet of retail uses were input into the VMT Calculator as a high-turnover restaurant land use." (*Id.*, p. IV.K-73) It is clear that the Project's wastewater analysis did not in fact take a conservative approach in analyzing only 5,000 square feet of restaurant uses. According to the wastewater generation rate provided in the DEIR, an additional 15,000 square feet of restaurant uses (and

15,000 fewer square feet of retail uses) would result in an additional 29,685 gallons per day of water demand, representing an approximately 14% increase in the net additional Project wastewater generation.

In its estimate of wastewater generation, the DEIR includes 194,600 square feet of basecamp area, stating that “[b]asecamp areas are dedicated to media production uses, parking, loading, and storage, where mobile facilities related to production are temporarily staged.” (*Id.*, pp. IV.M.2-14–15 [Table IV.M.2-2, note f]) The estimate also includes 36,000 square feet of Mobility Hub area. (*Id.*, p. IV.M.2-14) It is not clear where these figures comes from, as the DEIR does not otherwise provide square footages for basecamp areas or the Mobility Hub. Moreover, the analysis provides to explain why 194,600 square feet of basecamp area and 36,000 square feet of Mobility Hub area are included in the wastewater generation estimate, but the rest of the considerable floor area in the two planned production levels is ignored. The DEIR should have studied wastewater generation associated with all Project components.

Response to Comment No. 35-157

Refer to Response to Comment No. 35-155 regarding the maximum of up to 5,000 square feet of restaurant uses that would be developed as part of the Project and how the EIR evaluates the Project under the worst-case-scenario to provide the most conservative analysis.

Comment No. 35-158

3. The DEIR’s Analysis of Electric Power, Natural Gas and Telecommunications Infrastructure Impacts Is Inadequate.

The DEIR did not adequately analyze significant environmental effects associated with the Project’s potential to result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.

For example, the DEIR did not analyze potential environmental impacts associated with the installation of electrical and natural gas distribution lines and the expansion of the onsite communications system and related earthwork activities. (DEIR, p. IV.M.3-9-11) Even though the DEIR acknowledges that “off-site construction activities would be required to connect the existing off-site electricity lines to the proposed on-site electrical infrastructure,” the DEIR does not even attempt to calculate the distances to nearby sensitive receptors from which construction equipment would be operating. (*Id.*) Construction activities associated with electrical and natural gas distribution lines and the expansion of the onsite communications system could cause potentially significant noise and air quality impacts that the DEIR did not evaluate.

In addition, the electricity and natural gas demand calculations relied on by the DEIR do not account for basecamp areas and Mobility Hub use, not to mention the balance of the two production levels, even though those areas would clearly require electricity and natural gas. (DEIR, Appendix O, p. 66 [Exhibit 7]) The DEIR does not provide any explanation for why these Project components are omitted in the calculations of electricity and natural gas demand.

Response to Comment No. 35-158

The Draft EIR comprehensively analyzed the Project's impacts related to energy infrastructure in Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, and concluded that impacts would be less than significant. As discussed on page IV.M.3-10 of the Draft EIR, regarding electrical distribution lines, the Applicant would be required to coordinate any electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements as part of the connection permit process. This would ensure that potential service disruptions and impacts to existing electricity infrastructure associated with Project construction activities would be minimized. This same process would apply to telecommunications infrastructure. As such, Project construction activities would not adversely affect the existing electrical infrastructure serving the surrounding uses. Further, construction impacts associated with the Project's electrical infrastructure upgrades would primarily be confined to trenching to connect infrastructure required for the Project Site to the adjacent existing infrastructure. As noted in LADWP's will-serve letter, the existing infrastructure is sufficient to meet all Project demands and no major infrastructure upgrade is necessary. The proposed Project connections would comply with all applicable LADWP and City requirements and be subject to all applicable PDFs and mitigation measures.

The updated energy usage estimated using CalEEMod 2022.1.1, which accounts for the City's Ordinance No. 187714 (effective January 2023), is presented in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) and shows, based on application of Ordinance No. 187714, that energy usage would be higher than the energy usage estimated for the Project in the Draft EIR. Thus, the City requested LADWP to provide an updated will-serve letter demonstrating that the Project's estimated electricity demand (including EV chargers and electrical hook-ups) could be met by the existing electrical infrastructure in the Project area. The updated LADWP will-serve letter is provided in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) and confirms (a) that LADWP's infrastructure, including distribution grid, is sufficient to address the Project's electricity demands, and (b) the Project's less-than-significant electricity impact conclusion in the Draft EIR.

The environmental effects associated with on-site construction activities, including the installation of electricity, natural gas and telecommunication improvements, are accounted for in the impact analyses throughout the Draft EIR, as appropriate. Specifically, the number of construction workers and types of equipment for these improvements are accounted for in the building foundation and building construction activities evaluated throughout the Draft EIR. Refer to Appendix FEIR-8 of this Final EIR for an overview of the construction assumptions for the Project, including the construction equipment mix and number of workers. As such, air quality and noise impacts associated with these on-site improvements have been accounted for.

While off-site construction activities would be required to connect the existing off-site electricity lines to the proposed on-site electrical infrastructure, any such activities would be minimal, temporary, and would occur within developed areas. Air quality, GHG, and energy impacts associated with operation of the Project construction equipment were analyzed in the Draft EIR. As shown in Table IV.A-10 of the Draft EIR, Project localized construction emissions would remain below significance thresholds for receptors located within 25 meters of the Project Site. It should be noted that a 25-meter receptor distance is the closest receptor distance on the SCAQMD LST lookup tables and may be used to analyze receptors located closer than 25 meters in accordance with LST methodology. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, Section IV.M.2, Utilities and Service Systems—Wastewater, and Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR, while a limited amount of temporary construction may occur just off-site for the installation of utility tie-ins, the disturbed areas, hauling quantities, and necessary equipment were accounted for in the Project modeling, and any off-site emissions would be less than those of on-site construction activities. Since on-site construction was analyzed using the most conservative (25-meter) receptor distance, there is no more conservative (i.e., closer) receptor distance when following the LST methodology for the analysis of impacts on sensitive receptors, and the on-site analysis is representative, if not conservative due to the greater intensity of on-site activities.

Refer to Response to Comment No. 26-50 for a discussion of operational energy demands of the basecamps and Mobility Hub and the updates to the Project modeling to account for the City's new all-electric buildings ordinance.

With regard to noise impacts associated with on-site construction activities, refer to pages IV.I-35 through IV.I-59 of Section IV.I, Noise, of the Draft EIR. With regard to noise associated with utilities connections, refer to Response to Comment No. 35-154.

Comment No. 35-159**T. The DEIR's Analysis of Alternatives Is Inadequate.**

Pursuant to CEQA, a draft EIR must include a discussion of a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and evaluate the comparative merits of the alternatives. Guidelines § 15126.6. This requirement compels the lead agency to (1) identify a range of feasible alternatives, including alternative sites, that could attain the project objectives, (2) identify alternatives that would avoid or substantially lessen the significant environmental impacts of the project and (3) discuss the comparative environmental effects of the alternatives and the project. The discussion of the alternatives' environmental impacts must include adequate factual information, including quantitative data. *Kings County*, 221 Cal. App. 3d at 733–734. In essence, the alternatives analysis must be sufficient to allow informed public participation and informed decisionmaking. Guidelines§ 15126.6(a); *Laurel Heights*, 47 Cal. 3d at 404.

The analysis of alternatives in the DEIR fails to comply with these and other fundamental CEQA requirements and is legally inadequate for the reasons discussed below.

Response to Comment No. 35-159

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the range of alternatives selected. As stated therein, there are no requirements governing the nature or scope of the “reasonable range” of alternatives to be discussed, other than the “rule of reason” (CEQA Guidelines Section 15126.6(a) & (f)). The range of alternatives that were analyzed was appropriately based on the significant impacts identified in the Draft EIR and public comments. Refer to Response to Comment Nos. 35-160 through 35-167 for a more detailed discussion of the adequacy of the Project's alternatives analysis.

Comment No. 35-160**1. The No Project Alternative Is Inadequate.**

The lead agency is required to analyze the impacts of the no project alternative by projecting “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Guidelines§ 15126.6(e)(2). In addition, “the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.” Guidelines§ 15126.6(e)(3)(B).

The DEIR states that it includes one no project alternative, which is designated “Alternative 1: No Project/No Build Alternative.” Under this no project/no build alternative,

no new permanent development would occur within the Project Site, and the existing environment ... would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings and surface parking areas would remain on the Project Site, and no new construction ... would occur. (DEIR, p. V-19)

To justify the selection of this no project alternative, the DEIR quotes a phrase in Section 15126.6(e)(3)(B) of the Guidelines, which states that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

However, this is not the central principle that governs the selection of a no project alternative. Rather, as previously stated, the overarching standard is “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Guidelines§ 15126.6(e)(2).

The DEIR fails to explain why this is a “certain instance” in which the no project alternative should be maintenance of the status quo. To the contrary, it appears self-evident that Hackman would not simply continue to operate the Existing Television Studio with no further development given that a large portion of the Project Site is undeveloped and/or underutilized.

What seems far more likely than maintaining the existing physical condition of the Existing Television Studio for the foreseeable future is that Hackman would seek to expand the Existing Television Studio in accordance with the existing zoning and General Plan land use designations. According to the DEIR’s discussion of Alternative 2 (Development in Accordance with Existing Zoning Alternative), those existing designations permit up to approximately 1.6 million square feet of studio-related development, including broadcasting studios, offices, and retail uses. (DEIR, p. V-32) While Hackman certainly might propose less than the maximum-permitted density if the current Project does not go forward, it is difficult to imagine that Hackman would not seek entitlements for additional development, given its significant investment.

Therefore, the inclusion of this “no build”/no project alternative violates CEQA because it cannot be reasonably expected that the Site would remain in its present condition if the Project was disapproved. Rather, based on the current land use and zoning designations and the demand for additional studio facilities in the City, it can be reasonably expected that some development would occur on the Project Site if the Project does not go forward.

There is no evidence in the DEIR to support the proposition that no development of any kind would occur on the Site if the Project was not approved.

Response to Comment No. 35-160

As stated on page V-2 in Section V, Alternatives, of the Draft EIR, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative. CEQA Guidelines Section 15126.6(e)(1) states that “[t]he specific alternative of ‘no project’ shall also be evaluated along with its impact. The purpose of describing and analyzing a ‘no project’ alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Per CEQA Guidelines Section 15126.6(e)(3)(B), the “no project” alternative must “compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.” The No Project/No Build Alternative included in Section V, Alternatives, of the Draft EIR meets the requirements of CEQA Guidelines Section 15126.6(e)(3)(B) and correctly evaluated a scenario where the existing environmental setting is maintained.

Thus, Alternative 1 in the Draft EIR satisfies CEQA’s requirements concerning the evaluation of a no project alternative. Notably, CEQA Guideline Section 15126.6(e)(3)(B) expressly contemplates that the no project alternative for a development project “means ‘no build’ wherein the existing environmental setting is maintained” and “compares the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.”

The commenter claims that the no project/no build alternative is not legally adequate because it does not analyze an alternative based on a hypothetical request by the applicant for entitlements for a different project that exceeds the current zoning. However, that claim runs contrary to the language in CEQA Guidelines Section 15126.6(e)(3) that limits the no project alternative to “the property remaining in its existing state[.]” Further, any analysis of an alternative based on an undefined entitlement request would constitute speculation, which is not permitted under CEQA. (Refer, for example, to CEQA Guidelines Section 15384, which excludes speculation from the definition of “substantial evidence.”) In addition, the analysis sought by the commenter, namely the evaluation of a development project at the Project Site and its potential environmental impacts, is provided in Alternative 2. Accordingly, the EIR provides public and the decisionmakers with a range of alternatives to compare against the the proposed Project and its impacts.

Comment No. 35-161**2. The DEIR Does Not Include a Reasonable Range of Alternatives That Would Avoid or Substantially Lessen the Project's Significant Environmental Impacts and Feasibly Attain Most of the Project Objectives.**

As previously discussed, a draft EIR must (a) describe a range of reasonable alternatives to the project or to the location of the project that would feasibly attain most of the basic project objectives and avoid or substantially lessen any of the significant effects of the project. Guidelines § 15126.6(a).

Other than the no project alternative (which is not an evaluative alternative), the DEIR includes four project alternatives. Alternative 2 (Development in Accordance with Existing Zoning Alternative) contemplates a total of 1,600,666 square feet of studio-related development based on the Project Site's existing General Plan land use and zoning designation, including approximately 856,986 square feet of new general office space and the retention of 743,680 square feet of existing development. (DEIR, p. V-32) Alternative 3 (Reduced Density Alternative) involves a 20% reduction in the Project's proposed development program. (*Id.* p. V-62) Alternative 4 (Mixed-Use Alternative) assumes approximately 3,700,000 square feet of development, including 3,680 new residential units in three towers and a total of 924,370 square of studio and commercial uses. (*Id.* p. V-91) Alternative 5 (Above-Grade Parking Alternative" changes the Project's subterranean parking to above-ground parking. (*Id.* p. V-127)

For the reasons discussed below, the DEIR fails to include a reasonable range of alternatives that avoid or substantially lessen the Project's significant environmental impacts and feasibly attain most of the project objectives.

Response to Comment No. 35-161

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the reasonable range of alternatives considered for the Project. Refer to Response to Comment Nos. 35-160 and 35-162 through 35-167 for a more detailed discussion of the adequacy of the Project's alternatives analysis.

Comment No. 35-162**a. Alternative 2 (Development in Accordance with Existing Zoning).**

The General Plan Buildout Alternative assumes that the Project Site would be developed "in accordance with the existing zoning and land use regulations for the Project Site...." (*Id.* p. V-32) This alternative is neither meaningful nor reasonable. First, it is not an evaluative alternative. Rather, it is another no project alternative because it attempts to

forecast what would be reasonably expected to occur if the City does not approve the Project. Therefore, it should not be considered in determining whether the EIR includes a reasonable range of alternatives.

Moreover, the formulation of Alternative 2 is unreasonable. It assumes that the new construction would consist of a 15-story office building along the entire length of Fairfax Avenue and a six-story parking structure adjacent to Broadcast Center. This alternative appears arbitrary because it does not include any new sound stages or production support or production office space, notwithstanding that, according to the DEIR, the existing zoning designations allow those uses. In addition, the DEIR fails to explain why a new six-story parking structure is required on the other end of the Project Site or why it would need to be located adjacent to Broadcast Center.

The selection of these mystifying uses appears designed to maximize the number of project objectives that Alternative 2 does not satisfy in whole or in part. Specifically, according to the DEIR, Alternative 2 would only fully meet one of the 12 project objectives. (*Id.*, p. V-60) It therefore would not attain most of the project objectives and is improper for this additional reason.

Finally, Alternative 2 does not avoid or substantially lessen any of the Project's six significant air quality, construction noise and construction vibration impacts identified in the DEIR. (DEIR, pp. V-16–17)

Response to Comment No. 35-162

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of the range of alternatives chosen.

With respect to the commenter's objections to the program analyzed in Alternative 2, no evidence is provided that the scenario analyzed in Section V of the Draft EIR is improper under CEQA. Alternative 2 was designed to present a reasonable range of alternatives, while still being a viable alternative that is designed to meet the underlying purpose of the Project to maintain Television City as a production use and to modernize and enhance production facilities. The types of uses and locations for development within the Project Site are reasonable given the constraints on development this scenario would represent, and the commenter has provided no evidence to the contrary. Modern studios require a higher programmatic percentage of office space, significantly more than was traditionally provided, to support the evolution of overall production ecosystem, including additional space for uses ranging from marketing, to accounting, to human resources. Currently at the Project Site, there is a lack of such additional office space within the existing studio facilities. Accordingly, Alternative 2 contemplates the development of such additional office space to better support the existing studio and production requirements.

Development of such additional office buildings would leave no physical space at the Project site for the development of additional stages and other production facilities given the spatial requirements of these uses and development standards of the existing zoning and other City land use regulations. This alternative is also responsive to public comments requesting that taller structures be located along Fairfax Avenue, furthest away from the Broadcast Center Apartments. This comment is therefore noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Regarding significant and unavoidable impacts, as stated on page V-58 of Section V, Alternatives, of the Draft EIR, while these impacts would remain significant and unavoidable, the duration of such impacts would be reduced due to the overall reduction in building footprint and associated construction activities. Furthermore, as discussed on page V-13 of Section V, Alternatives, of the Draft EIR and in Topical Response No. 16, Project Alternatives Analysis, an analysis was performed to determine whether the Project's significant impacts related to on-site construction noise and on-site vibration could be substantially reduced or avoided through an alternative development program, and no feasible alternative was identified.

Comment No. 35-163

b. Alternative 4 (Mixed-Use).

As with Alternative 2, Alternative 4 does not avoid or substantially lessen any of the Project's six significant air quality, construction noise and construction vibration impacts identified in the DEIR. (DEIR, pp. V-16–17) To the contrary, according to the DEIR, Alternative 4 would substantially increase many of the Project's impacts, and would reduce almost none of them, because the new development, based on an overall FAR of 3.45:1, would result in more than 3,000,000 square feet of new construction and almost 3,700,000 square feet of total space, which dramatically exceeds the Project's 1,626,180 square feet of new development and 1,874,000 square feet of total development.

The DEIR could easily have included a mixed-use alternative with residential and studio-related uses with less floor area and required excavation, which would reduce most or all of the Project's impacts and at least one of the Project's significant impacts. Instead, the preparers of the DEIR chose to include Alternative 4, which defeats the central purpose of an alternatives analysis to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Guidelines § 15126.6(b).

Relatedly, Alternative 4 only meets two of the 12 project objectives. (*Id.*, p. V-124) It therefore would not attain most of project objective and is improper for this additional reason.

Response to Comment No. 35-163

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of the range of alternatives chosen, and Response to Comment No. 26-181 for a discussion of Alternative 4.

Comment No. 35-164

c. Alternative 5 (Above-Grade Parking).

Alternative 5 only considers a modification of one small component of the overall conceptual Project—eliminating subterranean parking and replacing it with above-grade parking structures. (DEIR, p. V-127) This alternative is improper because it violates the requirement that an EIR must discuss a reasonable range of alternatives to the entire Project, not just one part of it. Guidelines§ 15126.6(b).

Furthermore, Alternative 5 is illusory. It is predicated on the assumption that the Project would include subterranean parking. However, the Project is **not** required to include **any** subterranean parking. As stated in the DEIR's project description,

[w]hile the [DEIR Conceptual Plan] illustrates specific parking locations [as previously discussed, it actually does not], ultimately parking may be located throughout the Project Site, provided that the Specific Plan's requirements are met. Accordingly, **parking may be provided in a combination of the above-ground structures, subterranean structures, and/or surface spaces** (DEIR, p. II-30; see *also* p. IV.K-44, emphasis added)

This provides no basis for a meaningful comparative analysis of Alternative 5 with the proposed Project. (See Section II.C.3, *infra*, for a more detailed discussion regarding the illusory nature of the entire alternatives analysis.)

Response to Comment No. 35-164

Regarding the proposed development program and Conceptual Site Plan and the conceptual nature of the plans in an EIR, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5 and 26-12. The Draft EIR properly defines the Project to allow for an adequate comparison between the Project and alternative development scenarios.

This comment misconstrues CEQA Guidelines Section 15126.6(b). The relevant portion of that provision states “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening *any* [emphasis added] significant effects on the project.” Nothing in the provision suggests an alternative must change the entire project, rather than a part of it.

The Draft EIR analyzes excavation up to a depth of approximately 45 feet to accommodate subterranean parking, resulting in approximately 772,000 cubic yards of soil excavation. Alternative 5, by contrast, is designed specifically to include aboveground parking to reduce impacts associated with grading and excavation. The aboveground parking analyzed in Alternative 5, beginning on page V-127 of Section V, Alternatives, of the Draft EIR, would require approximately 78 percent less import/export of soils (i.e., approximately 154,000 cubic yards). Accordingly, Alternative 5 would reduce the Project-level and cumulative significant and unavoidable construction related regional air quality NO_x impacts to a less-than-significant level with mitigation by eliminating subterranean parking and reducing excavation and the export of soil. Its inclusion is therefore justified under CEQA. Under CEQA, an alternative which is superior only in some respects to the proposed development project can satisfy the requirement of analysis of a reasonable range of alternatives. Refer to Topical Response No. 16, Project Alternatives Analysis.

Comment No. 35-165

d. Summary.

Based on the preceding discussion, Alternatives 2, 4 and 5 are inadequate alternatives and cannot be considered in determining whether the alternatives analysis includes a “range of reasonable alternatives.” As a result, the DEIR includes only one potentially reasonable alternative—Alternative 3 (Reduced Density). This does not constitute a range of reasonable alternatives.

Moreover, even Alternative 3 is suspect because it is limited to a 20% reduction in the Project’s proposed development program. In our experience, in City EIRs, the percentage reduction for reduced-density alternatives typically ranges from 25–35% in order to provide the public and decisionmakers [sic] with the comparative environmental benefits associated with a substantial density reduction. Why did Alternative 3 not include a more substantial density reduction?

Response to Comment No. 35-165

Refer to Response to Comment Nos. 35-162, 35-163, and 35-164 regarding Alternatives 2, 4, and 5, respectively.

With respect to Alternative 3, as discussed in Appendix FEIR-4, Economic Considerations Memorandum, at a 20 percent reduction of the Project's development program, this alternative would already be less effective than the Project at meeting its underlying purpose and objectives. A further reduction in density would meet the Project objectives to an even lesser extent. The City has no established thresholds on this matter, and the 20 percent reduction is a reasonable threshold. Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the discretion a lead agency has in defining project alternatives.

Comment No. 35-166

3. The Comparative Analyses Between the Alternatives and the Proposed Project Are Illusory and Unlawful.

Perhaps the most striking aspect of the four evaluative alternatives is that, in stark contrast to the nebulous Project, they are "stable" and "finite." The "Conceptual Site Plan" for each of those alternatives includes the locations of the alternative buildings and parking structures, the type of use for each building, the number of stories in, and height of, each building and parking structure, the precise number of parking spaces in each building, and parking structure and land use summaries. (DEIR, pp. V-33 [Figure V-3]), V-63 [Figure V-4]), V-92 [Figure V-5]) and V-128 [Figure V-6])

As a result, the comparative analyses of these alternatives with the proposed Project are meaningless. You cannot meaningfully compare concrete and finite alternatives with an amorphous project that permits an infinite number of development options. The project impact analyses are largely based on the DEIR Conceptual Plan. However, as the DEIR repeatedly notes, that conceptual plan "illustrates one potential development scenario." Given that Hackman could choose an entirely different development scenario, with entirely different uses, with entirely different floor areas, at entirely different locations, with entirely different circulation schemes, at entirely different distances from Broadcast Center and other sensitive receptors, comparing the impacts of the alternatives with the impacts associated with buildout under the DEIR Conceptual Plan is a hollow and pointless exercise. This does not "foster informed decisionmaking [sic] and public participation," as mandated by Section 15126.6(a) of the Guidelines. Rather, it precludes it.

For example, although never directly stated in the DEIR, it appears that a portion of the 5,300 parking spaces contemplated in the DEIR Conceptual Plan would be constructed in subterranean structures, while other parking spaces would be located in above-ground parking structures or in surface parking lots. On this basis, the DEIR analyzed the Project's construction air quality and noise impacts. The DEIR later comparatively analyzes those impacts with the corresponding construction air quality noise impacts associated with the four alternatives. However, as previously noted, the DEIR, "parking may be provided in a

combination of the above-ground structures, subterranean structures, and/or surface spaces....” (Id., p. II-30; see also p. IV.K-44) What if Hackman eventually decides to include all of the Project’s parking spaces in subterranean structures? That would significantly alter the comparative analyses of construction noise and air quality impacts.

The comparative analyses as they relate to Broadcast Center further demonstrate their valuelessness. All of the alternatives include new construction in close proximity to the BC Site, including six-level and nine-level parking structures close to the western and southern boundaries of the BC Site (Alternative 2), general office, sound stage and production support buildings close to the western boundary of the BC Site and a nine level parking structure close to the southern boundary of the BC Site (Alternative 3), a six level general office building near the western boundary of the BC Site and a four story parking structure close to the southern boundary of the BC Site (Alternative 4), and a 10-story office building and sound stages near the western boundary of the BC Site and a 12-level parking structure close to the southern boundary of the BC Site (Alternative 5). In addition, each alternative, except for Alternative 2, appears to include the same new private streets contiguous to the BC Site that are vaguely shown on the DEIR Conceptual Plan.

Once again, there is no basis for comparative analysis because, unlike the alternatives, Hackman would have the flexibility to construct any building or parking structure, with any use, at any distance from the BC Site and at heights that exceed those apparently contemplated in the DEIR Conceptual Plan. Nothing would stop Hackman from constructing 160-foot-tall buildings and/or parking structures all along the western boundary of the BC Site. The construction and operational air quality and noise impacts resulting from such construction would be significantly different from, and greater than, the stated impacts in the DEIR’s construction and noise analyses, and would result in very different comparative analyses.

These differences would also be affected by whether Hackman chose to build a new 30 foot-wide private street contiguous to the western boundary of the BC Site and a new 60 foot-wide private street contiguous to the southern boundary of the BC Site. The Conceptual Site Plans for Alternatives 3, 4 and 5 include the same new private streets, and therefore the same comparative impacts (to the extent that the DEIR actually analyzed the impacts of those two new private streets on Broadcast Center, which it apparently did not). Hackman, however, would not be required to construct these new private streets adjacent to the BC Site. If it chose to construct new private street elsewhere, that could significantly affect the comparative air quality and noise analyses as they relate to Broadcast Center (and, for that matter, The Grove and Farmers Market).

For these reasons, the comparative environmental analyses in Section V (Alternatives) of the DEIR have no value and are fundamentally inadequate.

Response to Comment No. 35-166

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-5, 9-12, 26-12, and 35-4 through 35-27 regarding the adequacy of the Project Description, how the Project Description complies with CEQA and is accurate, stable and finite, and the regulatory framework under the proposed Specific Plan. The Project does not permit “an infinite number of development options” as claimed by the commenter. The Draft EIR analyzes the maximum development allowed under the proposed land use exchange program in order to provide the public and decision-makers with the worst-case scenario. As such, comparison of the alternatives to the Project analyzed throughout the Draft EIR is entirely appropriate. Refer to Topical Response No. 13, Parking, and Response to Comment No. 9-20 regarding parking.

As provided in Response to Comment No. 26-135, the noise analysis was performed based on the conservative assumption that the future buildings would be located along the perimeter of the Project Site, accounting for the required frontage areas. In addition, the Project noise analysis includes an aboveground parking structure (located at the southeastern portion of the Project Site), and/or surface parking throughout the Project Site. As indicated in Response to Comment No. 26-135, noise impacts would remain less than significant if the parking structure were to be located along the eastern perimeter of the Project Site, where a 30-foot frontage area would separate the structure from the Shared Eastern Property Line.

As noted above in Response to Comment No. 35-12, the commenter’s claim that the Project would include “new private streets” is incorrect; rather, the Conceptual Site Plan includes internal circulation paths. Refer to Response to Comment Nos. 16-11 and 35-31 regarding the Project’s multi-level circulation plan, which is discussed on pages IV.K-42 to IV.K-44 in Section IV.K, Transportation, of the Draft EIR. Refer to Response to Comment No. 26-141 regarding the noise analysis for the on-site vehicle movements, including the on-site driveways west and south of the Broadcast Center Apartments. As discussed therein, noise impacts associated with the on-site vehicles would be less than significant.

With regard to air quality, as discussed in Response to Comment No. 26-E.1-2, the air quality analysis in Section IV.A, Air Quality, of the Draft EIR fully accounts for construction activities and impacts to sensitive receptors. Maximum daily air quality impacts occurred during the grading phase and reflected the amount of import/export (i.e., number of haul truck trips). Thus, air quality impacts analyzed in Section V, Alternatives, of the Draft EIR were also evaluated based on the amount of import/export. Thus, alternatives resulting in more import/export would result in an overall increase in air quality impacts, and alternatives resulting in less import/export would result in a decrease in overall air quality impacts. Also refer to Response to Comment Nos. 26-26 and 26-28

regarding how the air quality analysis in the Draft EIR fully accounts for on-site circulation of vehicles during operation.

Comment No. 35-167

4. The DEIR Fails To Include an Alternative That Actually Concentrates Development Away From Existing, Offsite Sensitive Uses and Reconfigures the Conceptual Onsite Circulation System.

Broadcast Center, as well as the owners of The Grove and Farmers Market, have asked Hackman to consider moving the most intense new development on the Project Site away from their existing buildings and to modify the conceptual project design, including the locations of the new private streets and parking structures, to reduce the Project's impact on Broadcast Center, The Grove and Farmers Market. For example, Broadcast Center has repeatedly requested that Hackman (a) shift the Project's primary development footprint to Fairfax Avenue, where it would have minimal or no impact on residents and neighbors and would reduce the Project's impact on the Primary Studio Complex, and (b) not construct new private streets at the western and southern boundaries of the BC Site, which would completely encircle Broadcast Center with streets and constant truck and other vehicular traffic.

The alternatives in the DEIR are largely unresponsive to these requests. The text descriptions of the alternatives generally ignore the onsite circulation systems for them. It appears from the Conceptual Site Plans for the alternatives that Alternatives 3 (Reduced Density) and 5 (Above-Grade Parking), which include studio-related buildings and uses, feature the same onsite private streets and circulation system as the DEIR Conceptual Plan for the Project. Alternatives 2 (Development in Accordance with Existing Zoning) and 4 (Mixed-Use) do place the most intensive development along Fairfax Avenue and do not include new private streets along the western and southern boundaries of the BC Site, but those uses are not studio-related uses, and instead new general office (Alternative 2) and residential (Alternative 4) development that apparently does not require new private streets contiguous to the BC Site. Therefore, there is no alternative that considers a substantial expansion of studio facilities where that development is centered on Fairfax Avenue and does not include new private streets adjacent to the BC Site. Nor does Section V.3 in the alternative section explain why such an alternative is infeasible.

We surmise that the reason the DEIR omits such an obvious alternative that is responsive to the requests by surrounding property owners, and would reduce the Project's environmental impacts, is that Hackman must believe, for whatever reason, that it requires the building layout and onsite circulation system in the DEIR Conceptual Plan, or something close to it, to accommodate the significant expansion of the existing studio facilities. The apparent rigidity of Hackman's position is likely tied to the two contemplated

“production levels” that could cover the entire Project Site as part of a “multi-level circulation plan” (DEIR, p. II-25). However, since neither the DEIR

Conceptual Plan nor any of the Conceptual Site Plans for the alternatives illustrate the location of these production levels or how they would connect to the new “conceptual” onsite private streets and parking structures, there is no way to understand how the Project’s onsite circulation and parking would actually work and what alternative or alternatives to that circulation system and building layout are appropriate alternatives for discussion and analysis in the DEIR.

Broadcast Center therefore requests, and believes CEQA and the Guidelines require, that the alternatives analysis in the DEIR be expanded to add an alternative that shifts the primary development footprint for the expanded studio facilities to Fairfax Avenue and modifies the onsite circulation and parking system to reduce substantially the Project’s impacts on Broadcast Center, The Grove Drive and Farmers Market. This alternative would be consistent with the basic purpose of the Project.

Response to Comment No. 35-167

The consideration, selection, range and analysis of alternatives in the Draft EIR was conducted in compliance with CEQA. Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of alternatives suggested during public comment. As discussed therein, while an EIR must describe a range of reasonable alternatives that avoid or reduce a project’s significant impacts, it “need not consider every conceivable alternative to a project.” (CEQA Guidelines Section 15126.6(a).) Per CEQA Guidelines Section 15126.6(f), “alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Because the Project will not have any significant impacts during operation including impacts associated with access or parking, consideration of the alternatives suggested in this comment is not required under CEQA. Further, CEQA establishes no categorical legal imperative as to the scope of the alternatives to be analyzed in the EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As noted above in Response to Comment No. 35-12, the commenter’s claim that the Project would include “new private streets” is incorrect; rather, the Conceptual Site Plan includes internal circulation paths. Refer to Response to Comment Nos. 16-11 and 35-31 regarding the Project’s multi-level circulation plan, which is discussed on pages IV.K-42 to IV.K-44 in Section IV.K, Transportation, of the Draft EIR.

An alternative with development centered on Fairfax Avenue is not required under CEQA because no significant impacts associated with the placement of buildings were

identified. Similarly, there are no impacts associated with onsite circulation (refer to pages IV.K-45 through IV.K-79 of Section IV.K, Transportation, of the Draft EIR). As such, an alternative addressing these issues was not required under CEQA.

With respect to the Project's on-site circulation and access to parking and internal uses, refer to Figure IV.K-3 (Vehicular Project Site Access) of Section IV.K, Transportation, of the Draft EIR. Refer to the discussion of Alternative 5, which eliminates the below-grade parking and circulation levels, in Response to Comment No. 26-182.

Comment No. 35-168

5. The Project Objectives Are Flawed and Their Application To the Alternatives Analysis Is Therefore Improper.

Many of the 12 project objectives in the DEIR, which are applied in the alternatives analysis in an effort to demonstrate that the various alternatives are infeasible, are improper for the reasons set forth below.

The first project objective states:

Create a fully integrated and cohesive Master plan site regulated by a Specific Plan that retains the Project Site's land use as a studio facility and provides an expanded, flexible, and operationally seamless production ecosystem that can respond to evolving market demands, support content creation, and maximize studio production capabilities. (DEIR, p. II-10)

This objective is improper because it is essentially a description of the Project, rather than a project objective. As we sometimes say in land use circles, it is too "on the button." The same is true for the fifth project objective, which states:

Optimize the currently underused Project Site to address past ad hoc building additions meet the existing unmet and anticipated future demands of the entertainment industry by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities and production offices. (*Id.*, p. II-11)

The sixth project objective is improper because the DEIR Conceptual Plan and proposed Height Zones are flatly inconsistent with it. It states:

Complements the neighboring community through design elements that would be compatible with the surrounding uses, **concentrate building mass and height toward the center of the Project Site**, and provide an enhanced

public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses. (*Id.* p. II-11, emphasis added)

As previously discussed, the DEIR Conceptual Plan and the proposed Height Zones do **not** concentrate building mass and height toward the center of the Project Site. To the precise contrary, they push development to the perimeter of the Project Site, with numerous buildings in very close proximity to the western and southern boundary lines of the BC Site. Moreover, it is impossible to determine from a review of the DEIR whether the DEIR Conceptual Plan, or any other formulation of the Project subject to the proposed development program in Figure II-2 and the Height Zones in Figure II-5, would “foster connectivity and safety, and better integrate on-and off-site uses.” Not only is this phrase indecipherable, the public would not know whether that is true or not until after the adoption of the Specific Plan, when Hackman seeks building permits to construct new improvements on the Project Site in accordance with approved construction plans. Furthermore, contrary to this objective, the adjacent owners believe that the Project, as illustrated in the DEIR Conceptual Plan, would significantly conflict with, rather than “better integrate” with, surrounding uses and the existing public streets. For these reasons, this project objective is inadequate.

The seventh project objective is also suspect. It states:

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

The reader cannot determine, however, whether the Project, as embodied by the DEIR Conceptual Plan and other conceptual graphics in the DEIR’s project description, is consistent with this objective. According to the DEIR, the central component of the “multi-level circulation plan” are the two “production levels.” (*Id.*, p. II-25) However, as previously discussed, neither the DEIR Conceptual Plan nor any other graphic in the DEIR or underlying reports discloses the location of the production levels and how they would connect to the onsite circulation system and parking areas. Moreover, since the DEIR Conceptual Plan, as well as the Illustrative Vehicular Site Access graphic in Figure II-7, are “illustrative,” there is no way to know whether the ultimate access points and onsite circulation system would meet this project objective. As a result, there is no basis for determining whether the Project itself complies with this objective.

The eighth project objective states: “Create multiple production basecamps to allow for the flexible and efficient staging of vehicles needed for film and television productions.” (*Id.*, p. II-11) Once again, it is impossible to determine whether the Project, as reflected in the

DEIR Conceptual Plan, would meet this objective because neither that conceptual plan nor, to our knowledge, any other graphic in the DEIR discloses the location of any potential basecamp areas. And, even if such information existed, it would only be illustrative and Hackman would not actually be required to include any basecamp areas as part of the Project.

The 10th project objective states:

Create a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation by achieving LEEP [sic] Gold certification or equivalent green building standards.” (*Id.*)

This is not a project objective. Rather, it reflects existing regulatory requirements.⁵⁴

The 11th project objective states:

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

Once again, there is no way to determine whether the Project itself meets this objective. As previously discussed, the DEIR does not disclose any of the Project’s architectural elements and includes nothing more than generic reference to nonexistent “design standards,” “design requirements” and “design regulations.” (*Id.*, pp. II-22, II-24) As also previously discussed, the DEIR provides no illustrations of any of the “creative signage” that Hackman may choose to install as part of the Project, nor does the DEIR reference any specific guidelines that would govern such signage, other than signage on, or in close proximity to, the Primary Studio Complex.

The 12th final project objective states:

Permit a reasonable, risk-adjusted return on investment commensurate with the Project Applicant’s fiduciary responsibilities and allow for sustained economic viability and growth in involving entertainment market, while generating tax and property revenues to the City. (*Id.*, pp. II-11–12)

This project objective is inappropriate because the DEIR includes no evidence, and makes no reference to any other document which includes evidence, that the Project “[p]ermits a reasonable-risk-adjusted return on investment commensurate with [Hackman’s] fiduciary’s responsibilities,” or explains what the required risk-adjusted return is or what Hackman’s

fiduciary responsibilities are. Moreover, since Hackman has an infinite number of development options, there is no way to determine its economic return on the Project.

In addition, almost all of the project objectives relate directly to expanding the existing studio facilities. However, the Specific Plan would allow a multitude of non-studio uses that Hackman could choose to develop on the Project Site. Therefore, it is even more uncertain that the Project would be consistent with most of the project objectives.

For all of these reasons, the project objectives do not provide a lawful basis for determining that any of the project alternatives are infeasible because the Project itself is inconsistent with them or there is no way to determine whether the Project itself is consistent with them due to the nebulous project description. If one cannot determine whether the Project satisfies numerous project objectives, then how can the DEIR determine, as it improperly attempts to do, whether the alternatives would fully meet, partially meet or not meet those objectives as “effectively” or as “well” as the Project? You first have to know whether and the extent to which the Project actually meets them.

Finally, with respect to the 12th project objective to permit a “reasonable, risk-adjusted return on investment,” the DEIR concludes that Alternatives 2, 3, 4 and 5 would all “partially meet” that objective or “would not meet the objective as well as the Project.” However, the DEIR provides no comparative economic evidence to support these conclusions, and such evidence is legally required. See, e.g., *Citizens of Goleta Valley v. Board of Supervisors*, 197 Cal. App. 3d 1167 (1988).

⁵⁴ We also note that the DEIR includes conflicting language regarding this project objective. The quoted language above is from the DEIR’s project description. However, the text of this project objective throughout the alternatives analysis omits the phrase “by achieving LEEP Gold certification or equivalent green building standards.” (*Id.*, pp. V-3, V-31, V-61, V-90, V-124) Therefore, it is unclear whether this phrase is part of the project objective.

Response to Comment No. 35-168

This comment makes a number of incorrect claims about the Project’s objectives. Note that the comment does not cite the precise text for the Project objectives that are included in Section II, Project Description of the Draft EIR. In particular, the text of objective 12 on page II-12 of the Draft EIR states “an evolving entertainment market” not “involving entertainment market.” First, the requirement to identify project objectives is set forth in CEQA Guidelines Section 15124(b), which provides that an EIR shall contain “[a] statement of the objectives sought by the proposed project,” including “the underlying purpose of the project,” but does not impose any substantive limitations on those objectives. Thus, “CEQA does not restrict an agency’s discretion to identify and pursue a

particular project designed to meet a particular set of objectives.”¹⁴⁹ Accordingly, the lead agency and Applicant have broad discretion regarding the selection of objectives. Specific criticisms of the Project objectives are addressed below.

Regarding the first and fifth Project objectives, the Project would expand and modernize operations at an existing studio, so it is reasonable that its objectives would be closely focused on studio uses. The commenter provides no evidence of any kind to support their assertion that these objectives are improper, offering only their opinion. As such, no further response is necessary.

Refer to Response to Comment Nos. 11-3 and 26-19 regarding how the Project meets its objective to concentrate building mass and height toward the center of the Project Site while still preserving the integrity of the HCM. Refer to Response to Comment No. 172-3 regarding the objective to complement and integrate the Project with surrounding uses.

With respect to the seventh and eighth Project objectives, refer to Response to Comment No. 35-5 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project as described in the Draft EIR, the conceptual nature of all plans in an EIR, and the Conceptual Site Plan that was analyzed in the Draft EIR, which is based on the plans that were submitted as part of the Project's entitlement application. Refer to Response to Comment Nos. 16-11 and 35-31 regarding the Project's multi-level circulation plan, which is discussed on pages IV.K-42 to IV.K-44 in Section IV.K, Transportation, of the Draft EIR. Refer to Figures II-3(b), II-4(d) and II-4(e) in Section III, Revisions, Clarifications and Corrections, of this Final EIR, which show the existing and proposed basecamp areas.

Regarding the tenth Project objective related to sustainability, the commenter is incorrect. LEED Gold certification or equivalent standards exceed those measures required by code.

With respect to the 11th objective, as discussed in Response to Comment Nos. 5-10 and 9-17 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed and analyzed all of the physical elements of the Project, including the proposed Sign District and design standards, required by CEQA.

Refer to Topical Response No. 4, Appropriateness of Economic Objective, for a discussion of the economic Project objective. Also refer to Response to Comment No. 5-6

¹⁴⁹ *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276–277.

and Topical Response No. 3, Permitted On-Site Uses, regarding the specific studio-related uses that would be permitted within the Project Site.

Comment No. 35-169

III.

CONCLUSION

For the reasons set forth above, we respectfully request on behalf of Broadcast Center that the City take no further action with respect to the proposed Project until such time as Hackman identifies a concrete development project for the Project Site that respects the Broadcast Center building and other surrounding uses, and the City thereafter prepares and circulates for public comment a revised DEIR for the Project that fully complies with CEQA.

Response to Comment No. 35-169

Refer to Response to Comment Nos. 35-10 through 35-168 regarding the issues raised in this comment. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 35-170

Exhibit 1—Ramboll US Consulting letter [44 pages]

Response to Comment No. 35-170

This attachment is identical to Exhibit 1 of Comment Letter No. 26, Latham & Watkins, Comment No. 26-E.1-1 through Comment No. 26-E.1-78. Refer to Response to Comment Nos. 26-E.1-1 through 26-E.1-78.

Comment No. 35-171

Exhibit 2—Linscott, Law & Greenspan letter [39 pages]

Response to Comment No. 35-171

This is identical to Exhibit 4 of Comment Letter No. 26, Latham & Watkins, Comment No. 26-E.4-1 through Comment No. 26-E.4-19. Refer to Response to Comment Nos. 26-E.4-1 through 26-E.4-19.

Comment No. 35-172

Exhibit 3—Statistical Research, Inc. letter [52 pages]

Response to Comment No. 35-172

This is identical to Exhibit 2 of Comment Letter No. 26, Latham & Watkins, Comment No. 26-E.2-1 through Comment No. 26-E.2-153. Refer to Response to Comment Nos. 26-E.2-1 through 26-E.2-153.

Comment No. 35-173

Exhibit 4—Cultural Heritage Commission Regular Meeting Agenda, Thursday, August 18, 2022 [6 pages]

Response to Comment No. 35-173

This comment consists of the Cultural Heritage Commission Regular Meeting Agenda for Thursday, August 18, 2022. Responses related to this attachment have been included in the responses to comments above.

Comment No. 35-174

Exhibit 5—TVC 2050 Slide Presentation, Cultural Heritage Commission, August 18, 2022 [29 pages]

Response to Comment No. 35-174

This comment consists of a PowerPoint presentation to the Cultural Heritage Commission with regard to the Project. Responses related to this attachment have been included in the responses to comments above.

Comment No. 35-175

Exhibit 6—United States Census Bureau, On The Map, Distance/Direction Report—Work to Home [4 pages]

Response to Comment No. 35-175

This comment consists of a Distance/Direction Report—Work to Home from the United States Census Bureau. Responses related to this attachment have been included in the responses to comments above.

Comment No. 35-176

Exhibit 7—USPS Tracking Printouts [6 pages]

Response to Comment No. 35-176

This comment consists of USPS Tracking Printouts related to the AB 52 consultation for the Project. Responses related to this attachment have been included in the responses to comments above.

Comment No. 35-177

Exhibit 8—USPS Tracking Confirmation [2 pages]

Response to Comment No. 35-177

This comment consists of USPS Tracking Confirmation materials related to the AB 52 consultation for the Project. Responses related to this attachment have been included in the responses to comments above.

Comment Letter No. 36

Rick Vazquez
President/Business Representative
Sprinkler Fitters Local 709
12140 Rivera Rd.
Whittier, CA 90606-2602

Comment No. 36-1

On behalf of Local 709 of the Sprinkler Fitters local union, we would like to express our strong support of the TVC 2050: The Los Angeles Studio Plan.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying construction jobs. Television [sic] City has agreed to employ union construction [sic] workers for the project which means new job opportunities [sic] for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 36-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 37

Adele B. Wilson
Executive Director
Streetlights
The Lot at Formosa
1041 N. Formosa Ave., WRT Ste. 6
Los Angeles, CA 90046-6703

Comment No. 37-1

Streetlights, a nonprofit Job Training, Job Placement and Career Advancement organization dedicated to helping redress the inequity of gender and racial hiring practices behind-the-camera, strongly endorses the TVC 2050 plan, a major investment in the studio property and in Los Angeles' entertainment industry.

The entertainment industry is one of Los Angeles' key industries and an economic driver for the entire region, providing quality jobs and significant tax revenue to the local economy. The studio's long-term plan to enhance its operations and create new jobs will help promote economic vitality and build new creative careers in the industry.

Television City has played an important role in supporting job training experiences for underrepresented communities by giving young people from diverse backgrounds exposure to the inner workings of a studio and set environment. This plan will allow Television City to expand its facilities and address the current demand for more production space while providing job opportunities that can help promote diversity and inclusion in entertainment.

Television City has shown itself to be a truly concerned and committed part of the Beverly/Fairfax District, the greater Los Angeles community and the entertainment industry. Please support the TVC 2050 plan.

Response to Comment No. 37-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 38

William Steiner
Business Manager
UA Local 398
8590 Utica Ave., Ste. 200
Rancho Cucamonga, CA 91730-4872

Comment No. 38-1

I'm writing on behalf of UA Local 398 to express our support for the TVC 2050 project.

This plan to modernize the 70-year-old Television City will bring more than 4,200 construction jobs to Los Angeles at a time when the city is continuing to recover from the impacts of COVID-19 and confronts increasing competition from other global production centers.

The modernization of Television City will ensure the future of the studio, create thousands of jobs, generate more than \$2.4 billion in new, annual economic output, and maintain Los Angeles' status as the entertainment capital of the world.

TVC 2050 represents a massive investment in one of the city's biggest industries and it will produce new, well-paying construction jobs. Television [sic] City has agreed to employ union construction [sic] workers for the project which means new job opportunities [sic] for the skilled and trained men and women of the Building Trades.

We're pleased to support this important project that will bring more jobs and revenue to Los Angeles.

Response to Comment No. 38-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 39

Tema Staig
Executive Director
Women In Media
tema@womennmedia.com

Comment No. 39-1

Keeping production in Los Angeles is critical to the sustainability of our entertainment industry. Television City's modernization effort will expand production capacity and offer the flexibility needed to keep up with ever-changing industry demands.

Sustainability in the TVC 2050 project extends beyond providing modern facilities and a flexible environment. It means incorporating sustainability measures into all aspects of the project.

To that end, the project has been designed to achieve LEED Gold or equivalent green building standards. Industry-leading sustainability features will include:

- Solar infrastructure designed to generate a minimum of 2M kilowatt-hours annually
- Water conservation best practices
- Energy efficient measures
- EV charging stations located throughout the property

TVC 2050 will promote long-term operations and sustainability to help reaffirm Los Angeles' status as the creative capital of the world.

Response to Comment No. 39-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 40

Artin A.
350 N. Detroit St.
Los Angeles, CA 90036-2531

Comment No. 40-1

I am a 27 year resident and I care deeply about economic justice, and I do not think the developers of this project have done enough to address this issue. It seems like a lot of rich guys came up with this without really considering how it would impact residents, particularly lower-income communities of color.

Response to Comment No. 40-1

Pursuant to CEQA Guidelines Section 15131(a), “economic or social effects of a project shall not be treated as significant effects on the environment.” Substantial evidence must be provided to demonstrate a reasonably foreseeable physical impact on the environment from the economic or social change. The commenter has provided no such evidence. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 40-2

Why isn't there affordable housing with this project? We have a massive housing shortage in Los Angeles. The idea that you can just dump a project of this size on our community without housing seems ridiculous. How many new residents are projected to move into the Beverly Fairfax area and into the surrounding communities to be closer to their jobs? Is that info in the EIR? Where will those new residents live?

There are tons of renters near CBS Television City. Will their rents go up? How much? Why not include workforce housing in the draft EIR? Imagine how much lower the impact of this project would be on the local community if they had less office space and more housing.

And for that matter, what will the impact be on our local family-run businesses? Will their landlords raise their rents and run them out in favor of high-end stores?

Response to Comment No. 40-2

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Residential and commercial rent and potential impacts on local businesses in and of themselves are not CEQA issues. Refer to Response to Comment No. 40-1 above regarding the consideration of economic and social effects under CEQA.

Comment Letter No. 41

Leslie Aaronson
319 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 41-1

Several questions came about since the release of the EIR for the proposed project at Beverly and Fairfax. I have several concerns regarding the impact of the community.

Response to Comment No. 41-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 41-2 through 41-4.

Comment No. 41-2

Firstly, why would the City care more about the success of the developer than the health and welfare of its residents? If the City is concerned about whether the developer's investment achieves its anticipated return, what is this expected return? The EIR rejects alternatives because the developer does not make as much money. What is the financial information underlying this objective? Why would an alternative that could possibly be a better fit with less direct and negative impacts on the neighborhood be dismissed, in favor of one that looks out for the developer instead? How can that be justified?

Response to Comment No. 41-2

This comment raises non-CEQA issues. Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the alternatives analysis provided in the Draft EIR. As discussed therein, the Draft EIR concluded that Alternative 5 is the Environmentally Superior Alternative. However, while Alternative 5 would reduce some of the impacts when compared to the Project, it would not meet a number of the Project's objectives to the same extent as the Project and would also result in substantially increased building massing on-site due to several multi-level parking podiums needed to accommodate above-ground parking.

Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 41-3

The project is just down the road from the La Brea Tar Pits. It seems obvious that digging down 45 feet across a 25-acre site will uncover many interesting finds such as artifacts. Has the plan considered this? Does the project have a plan for dealing with this? A detailed plan should be provided for the public to comment on.

Response to Comment No. 41-3

Refer to Response to Comment No. 13-7 regarding the analysis of archaeological resources and the means by which archaeological discoveries are evaluated and treated through implementation of Mitigation Measure CUL-MM-1. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities. The Project also includes Mitigation Measure GEO-MM-1, as revised in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, which pertains to the inadvertent discovery of paleontological resources. Together, these include consideration of the La Brea Tar Pits and the circumstances under which collection and curation of archaeological and/or paleontological materials could provide an adequate means of treating discoveries if preservation in place is not feasible.

Comment No. 41-4

Given the importance of the Holocaust Museum to LA, has the project considered that this is an important cultural and historic landmark for the City? Why would you build a 130-foot-tall parking structure with 5,000 cars across the street where thousands of children come every year? How will the school buses be able to drop children off to visit the Holocaust Museum when you are adding thousands of cars to Grove Drive? What is the safety impact to the children?

Response to Comment No. 41-4

The eligibility of the Holocaust Museum as a potential historical resource was considered during the initial investigation for the Draft EIR. It was concluded, however, that it does not yet qualify for evaluation as a potential historical resource for the following reasons:

- 1) The Holocaust Museum is largely a commemorative property that does not meet the special criteria for commemorative properties as delineated by “Criteria Consideration F: Commemorative Properties,” in *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*, published by the NPS; and
- 2) The Holocaust Museum was opened in 2010 and has not been in existence long enough to develop the necessary historic perspective to evaluate its historic significance.

It is important to understand that concluding that the current Holocaust Museum building is not currently eligible for historic designation in no way diminishes its importance as an institution, the importance of its collections, or its commemorative and educational missions. It simply points out that the Holocaust Museum building does not currently meet the definition of a *historical resource* as defined by CEQA, because it is not yet eligible for listing in the California Register.

NPS has created a special criterion for commemorative properties, Criteria Consideration F, as a guide to evaluating their potential historic significance. According to Criteria Consideration F, “a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.” In other words, a property dedicated to the commemoration of a particular event would need to possess historic significance outside of the value of the person or event memorialized in order to be considered historically significant and therefore eligible for listing as a historical resource. While the enormous historic importance of the Holocaust in world history is indisputable, a museum dedicated to the memory of the Holocaust would need to develop its own separate significance.

Although the Holocaust Museum as an institution was founded in 1961, the current building in Pan Pacific Park was not opened until October of 2010. At less than 13 years old, the current museum building has not been in existence long enough to develop the necessary historic perspective to evaluate its historic significance. According to guidance provided by NPS for applying National Register criteria, “50 years is a general estimate of the time needed to develop historical perspective and to evaluate significance.” Criteria for listing in the California Register does not include a specific age requirement but does state that “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource.”

Regardless of the historic significance of the current Holocaust Museum building, the Project does not propose its demolition, destruction, relocation, or alteration. All demolition and new construction proposed by the Project would be located on the Project Site, which is separated from the Holocaust Museum by The Grove Drive and adjacent sidewalks. Therefore, the Holocaust Museum would continue to be experienced and

understood by the public as it has been since its completion in 2010, after implementation of the proposed Project.

With respect to parking, the total parking supply on the Project Site would be a maximum of 5,300 parking spaces spread out across the entire Project Site, which would be served by three traffic signals and multiple driveways.

The Holocaust Museum drop off takes place on the east side of the roadway in a bus bay offset from the northbound through lanes. The school children are dropped off on a sidewalk adjacent to the Holocaust Museum and would not have to cross The Grove Drive. The amount of vehicles added to The Grove Drive itself would not negatively affect the bus bay pick-up and drop off procedures. For pedestrians approaching the Holocaust Museum from the west side sidewalk, a protected marked crosswalk would be incorporated into the traffic signal controlling the entrance to the Project.

The design of the Project gate along The Grove Drive and the signalized intersection controlling that gate will incorporate elements to address pedestrian safety, such as pedestrian push buttons, count down pedestrian walk/don't walk heads, continental crosswalk markings, and control heads for pedestrians on the west sidewalk.

Comment No. 41-5

These issues need to be addressed in order for the community to feel at peace with this project. I am sure you are able to understand my concerns and the way in which I care for the community.

Response to Comment No. 41-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 41-2 through 41-4.

Comment Letter No. 42

Seth Aaronson
319 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 42-1

As a concerned community member, I have important questions I'd like more information about. The Beverly Fairfax Historic District is home to many families as well as many businesses. As a community member, I want to preserve my neighborhood's safety and limit any crime in the area. Since learning more about the project and reading the draft for the Environmental Impact Review, I have become more concerned about the future of our district.

Response to Comment No. 42-1

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR. As analyzed therein, impacts related to police protection services would be less than significant.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 42-2

Many of the restaurants and shops along Fairfax Avenue will not be able to compete with large chains of restaurants bound to open. How many restaurants will move into the area? What kinds of restaurants? How many shops do the developers plan on bringing into the historic district? This will completely change the cultural standards of our neighborhoods. We must set examples for future generations that we support small businesses. I will not sit idly by and allow this to happen to my neighbors.

The price of commercial rent is also likely to increase if the project is improved. Will there be any rental subsidies for homeowners and business owners? How am I supposed to support a project that will increase my rent and send local business owners bankrupt? This project needs to include specific information and a plan in place to protect our community. I've seen developers move into neighborhoods throughout the country. Small business owners cannot lower their prices to compete with greedy corporations. The developers want to take away these people's livelihoods. If you care about our community, protect us and create a plan that will actually benefit us.

Where will the developers recruit construction workers from? With the project's expected completion date in over twenty years, it is inevitable that there are going to be a lot of workers in our neighborhoods, shops, restaurants and public transit.

Response to Comment No. 42-2

The Project is the continuation of the existing studio use. Refer to Section II, Project Description, of the Draft EIR, and Topical Response No. 1, Clearly Defined Project Description and Specific Plan, for information about the Project.

The Project Site is not located within the boundaries of the Beverly Fairfax Historic District. Refer to page IV.B-31 of Section IV.B, Cultural Resources, of the Draft EIR.

The potential for unplanned growth is analyzed in the Draft EIR. Refer to pages VI-14 through VI-17 of Section VI, Other CEQA Considerations, of the Draft EIR. As discussed therein, direct and indirect growth-inducing impacts would be less than significant.

Refer to Response to Comment No. 9-24 regarding the Project's buildout timeline.

The remainder of this comment discusses a number of non-CEQA issues such as potential impacts to the local economy and rents and the recruitment of construction workers. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 42-3

Thank you for your consideration. I look forward to reviewing the updates to the proposal.

Response to Comment No. 42-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 43

Andrew Abbott
919 N. Genesee Ave.
West Hollywood, CA 90046-7350

Comment No. 43-1

This letter is in reference to the television city [sic] 2050 project. I have a couple of questions about the cultural resource section of the environmental impact report.

Response to Comment No. 43-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 43-2

In the report, they stated that “a historic district is defined as a geographic area of land containing a significant concentration of buildings, [...] united by historic events, architecture, aesthetic, character, and/or physical development”. [sic] It also states that a district’s significance and historic integrity can be determined by its boundaries and other factors that include “visual barriers that mark a change in the historic character of the area or that break the continuity of the district,” and “visual changes in the character of the area due to different architectural styles.”

The report said that the architectural continuity of an area is something that the Planning Commission views as integral to the surrounding area and is a critical contributor to Historic Preservation Overlay Zones in Los Angeles. The Beverly Fairfax district has been renowned for architecture not only in Los Angeles but especially in the Mid-City West area. This area is known for showcasing architectural styles from Mission Revival, Period Revival, Spanish Colonial Revival, Victorian, Beaux-Art, Chateausque, to Modernist style homes, and structures. How does this proposed project adhere to the architectural continuity of the area that has already been preestablished?

This is an important fact considering that the Beverly Fairfax district has been designated an official historic district by the city of Los Angeles. What studies have been done on the architectural continuity to ensure that the character of the neighborhood stays intact during and after the construction of this proposed project? What do those studies find about whether the historic integrity and architectural continuity will be retained?

Many people move here to live in a place like Beverly Fairfax, to be a part of the community that incorporates so many different types of architecture, design, and arts. The architectural continuity is taken very seriously for a historic district known for unique and historic houses, beautiful and historic streets, museums, art galleries, more neighborhood-defining characteristics. What architectural body with the city will review and approve the proposed project? Would the project be able to move forward if the architectural continuity and integrity were not met?

Response to Comment No. 43-2

Setting is an important aspect of integrity of historic districts, as it is typically a key factor in conveying cohesiveness and unifying contributors. It is particularly important that the setting remains intact within the boundary of a district, but not necessarily outside the boundary. As explained in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), the Beverly Fairfax Historic District is located north of Beverly Boulevard, over 200 feet from the Project Site. The historic character of the Beverly Fairfax Historic District is contained within its boundaries, with the southernmost boundary (which is closest to the Project Site) defined as the alley parallel to and north of Beverly Boulevard. The significant components are the contributing buildings as well as their site design features. As such, and as explained on page 40 of the Historic Report, the Project would have no potential to directly or indirectly impact the Beverly Fairfax Historic District due to the distance between the Beverly Fairfax Historic District and the Project Site. The Project would not affect the number of buildings in the district or the ratio of contributing to noncontributing buildings. The spatial relationships and circulation patterns in the district would also be unaffected by the Project. Additionally, the broad setting is not a physical feature that conveys the significance of the Beverly Fairfax Historic District. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and to Response to Comment No. 363-7 regarding impacts to the Beverly Fairfax Historic District.

The comments regarding architectural continuity do not relate to the Draft EIR's analysis of the Project's environmental impact. These comments are noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 44

Sam Aberman
351 1/2 N. Stanley Ave.
Los Angeles, CA 90036-2335

Comment No. 44-1

As a resident of the Fairfax area, I need answers about the proposed TVC plan. It is absolutely unacceptable that existing street metered parking spaces will be replaced by commercial landing [sic] zones. This is appalling considering these spots are extremely limited as is. So many residents have been battling for more parking for years. I often find myself circling the block 30 times just to find a space. Imagining these existing spots being here no longer makes no sense. What is the city going to do to ensure employees, residents and even visitors can park in this area? What will replace those street parking spots? Those spots are used for people going to all kind of places in the neighborhood, not visiting the CBS building.

What metered spots on what specific streets will be affected? Why has this information not been provided yet and when can we expect it to? Are there going to be additional metered parking spots added to compensate for the loss of the others? Where will these be located? I do not understand why the EIR fails to mitigate these problems. Is there any way these commercial loading zones could be somewhere that the metered parking is not? Has the city analyzed how this will impact the community?

As an LA resident I totally understand what comes with living in the city. Congestion, traffic, and parking struggles are a daily obstacle. I don't understand why the city would allow more chaos with open arms. Can you explain how this project will not bring traffic the likes of which we haven't even experienced before? The car ratio compared to the parking ratio in the area cannot even come close to equal. How do you plan to deal with all this congestion and all the people that have no place to park? I am highly concerned for my community's well-being as they will be forced to spend hours of their lives dedicated to getting to a destination and will most likely regularly be late for work and anything else for that matter.

The problem won't be resolved when construction is completed. It's likely to even get worse when Television City employees are commuting and events are being held. Why does the EIR say there will be no significant impacts after construction is complete? What happens when an additional 8,000 people are expected to park in the community? Where will their parking go and what exactly does offsite parking mean? Does that mean that garages and lots will be in my neighborhood?

Response to Comment No. 44-1

First, with respect to the amount of proposed Project parking, refer to Response to Comment No. 9-28. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed in Topical Response No. 13, the Project no longer proposes off-site parking, and the Project would not permit cars to be parked anywhere outside of the Project Site. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

With respect to metered parking, the Project does not propose to remove any such parking.

Also pursuant to SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay is not a CEQA impact, and mitigation is not required. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). The Draft EIR and the Transportation Assessment analyzed the potential transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would have less-than-significant transportation impacts. In addition, the Project would institute an extensive transportation demand management program to encourage and support non-auto trips to/from the Project. The shuttle bus connection between the Project's Mobility Hub and the Metro D (Purple) Line is expected to remove almost 1,500 trips per day from the area streets. Carpool and programs to support transit will also be part of the Project's efforts to reduce automobile travel to/from the Project Site.

Comment No. 44-2

The community deserves a detailed analysis that we can come together and review. I will not stand for further disorder in my neighborhood and hope the city will not allow these issues to go unsolved...

Response to Comment No. 44-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 44-1.

Comment Letter No. 45

Alon Abishoor
905 N. Genesse [sic] Ave., #A
Los Angeles, CA 90046-7319

Comment No. 45-1

Building of the development could go on until 2043. If that is the case, why is the developer not considering multiple energy sources? I don't understand why the developer is planning to use natural gas. Shouldn't we strive to have new buildings that are fully electric in order to combat climate change? Why wouldn't the project be required to fulfill climate action objectives?

Are there other things the developer is going to do to offset the environmental damage that will occur as a result of usage of natural gas? For example, why not use electric vehicles during the duration of the project? What about electric trucks? I feel that if the project is going to use natural gas, the developer should be required to offset the negative contributions.

Another fear I have related to this is how the neighborhood will lag behind in the fight against climate change. What similar developments are happening around the country? What type of energy are they using? Will our area be less sustainable as a result of this project?

Response to Comment No. 45-1

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

After the NOP was published and Draft EIR for the Project was publicly circulated, the City of Los Angeles passed Ordinance No. 187714 which requires, with a few exceptions, all new buildings to be all-electric. The City's all-electric buildings ordinance applies to any development where an application for a building permit is submitted after April 1, 2023. The Project would comply with the all-electric buildings ordinance. Therefore, there would be no new natural gas demand associated with the Project, with limited exceptions permitted by the all-electric buildings ordinance. Furthermore, Project Design Feature GHG-PDF-3 is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at all basecamp areas during operations. Electrical demand associated with these power tie-ins are presented in the updated CalEEMod 2022.1.1 analysis included in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Comments (see Appendix FEIR-9 of this Final EIR). In addition, Table IV.C-2 (Summary of Net Annual Energy Use During

Project Operation) in Section IV.C, Energy, of the Draft EIR shows that the Project's solar generation (i.e., Project Design Feature GHG-PDF-2) would result in an approximately 383,000-kWh increase in production relative to existing conditions. Additionally, a PDF (i.e., Project Design Feature GHG-PDF-4) is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requiring all on-site operational equipment (e.g., forklifts, aerial lifts, carts, street sweepers, and landscaping equipment) to be powered by electricity. Refer to Response to Comment Nos. 26-39 and 26-E.1-38 regarding ZE and NZE trucks. The Draft EIR concluded that the Project would have less than significant impacts during both construction and operation, so offsets or other mitigation are not required under CEQA.

This comment also discusses other topics that are not specific to the Project, and no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 45-2

Similarly, the usage of natural gas requires high levels of maintenance and surveillance in order to ensure safety. What procedures and standards will be put in place to ensure the safety of Fairfax residents living near the project site? How will the safety of workers be ensured who are going to be even closer to the natural gas?

Response to Comment No. 45-2

Refer to Response to Comment No. 45-1 regarding the Project's use of natural gas. The Project would be required to implement appropriate protocols and management of subsurface gases per Mitigation Measure HAZ-MM-1. Additionally, as discussed on page IV.F-55 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, Mitigation Measure HAZ-MM-2 (included on pages IV.F-53 to IV.F-54 of the Draft EIR) requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public.

Comment No. 45-3

I am confident that most of the Fairfax community wants to have an active role in addressing global warming. As it stands, this development seems like we would be doing exactly the opposite!

Response to Comment No. 45-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-

makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 45-1 and 45-2.

Comment Letter No. 46

Aliza Abraham
539 N. Formosa Ave.
Los Angeles, CA 90036-1944

Comment No. 46-1

I would like to voice my concerns as a 20 year resident. I have a lot of questions about the CBS studios expansion.

Response to Comment No. 46-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comment Nos. 46-2 through 46-4, below, for responses to specific issues raised by the commenter.

Comment No. 46-2

As the city is aware, crime has been a huge issue in LA and in our neighborhood. There were just 2 home invasion robberies this past week.

Response to Comment No. 46-2

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 46-3

I saw in the EIR that there will be a mobility hub, what is mobility hub and what is provided and available? Will this hub be used by the general public? If so, it seems like that could attract transient people and crime. Will there be police there? What hours will police be on site at the mobility hub? What hours would this mobility hub be used? I am worried this will bring more crime into our neighborhood.

Response to Comment No. 46-3

The Mobility Hub functions that would be provided as part of the Project are discussed in Section II, Project Description, and Section IV.K, Transportation, of the Draft

EIR. As discussed in the Draft EIR, the Mobility Hub functions would be located on-site to support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and to support other modes of travel and TDM strategies that are likely to evolve over time. These features would be promoted and incentivized through programs administered by an on-site TDM coordinator and one or more transportation information kiosks, including within the Mobility Hub itself. The Mobility Hub would be open during the primary hours of operation for the Project. Additional information on the proposed Mobility Hub is provided in Topical Response No. 7, Mobility Hub, and Response to Comment No. 16-80.

The Mobility Hub is intended to serve the Project employees, visitors, and audience members. The Mobility Hub will not be open to the general public.

With respect to on-site security, as discussed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR (page IV.J.2-12), the Project would include a 24/7 security plan to ensure the safety of its employees and visitors pursuant to Project Design Feature POL-PDF-2. The Mobility Hub would not attract transients or bring crime into the neighborhood.

Comment No. 46-4

This project will also bring thousands of people into our neighborhood each day. The EIR says that there will be audiences allowed to come for filming. What are the security risks this brings? Will this impact crime? Will there be police coverage for our neighborhood if people are parking on our streets to go to the studio?

Response to Comment No. 46-4

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security. With regard to audiences, as discussed in Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, audience members would represent a small fraction of the on-site population, with a weekday daytime average of approximately 427 audience members. Audience members would park on-site, would enter the Project Site through a security gate and would be monitored by on-site security staff. As such, audience members would not create security risks or impact crime.

Comment Letter No. 47

John Abram
346 N. La Jolla Ave.
Los Angeles, CA 90048-2231

Comment No. 47-1

As a concerned citizen, who has lived in the neighborhood since 1970. The EIR provides details on several aspects of what should take place. However, I still question the impact this development will have on the environment and community.

Response to Comment No. 47-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comment Nos. 47-2 through 47-7 for responses to specific issues raised by the commenter.

Comment No. 47-2

The EIR says more than 5,000 parking spaces are needed but then says that the parking spaces may be offsite. Where are all the people going to park?

Response to Comment No. 47-2

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR. Refer to Section A, Parking Supply, in Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply.

Comment No. 47-3

I am concerned about the traffic and congestion that will be caused by this amount of people and cars. Will there be any sort of traffic control?

Response to Comment No. 47-3

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion and driver delay are not CEQA impacts, and mitigation is not required. Refer to Section B, Level of Service, of Topical Response No.

12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer also to Topical Response No. 9, Neighborhood Traffic Management Plan; Topical Response No. 11, Transportation Demand Management; and Topical Response No. 15, Transportation Improvement Program.

Comment No. 47-4

If the parking is offsite, what are the air quality impacts, noise impacts, safety issues from people speeding in the community, pedestrian impacts, and other impacts of off-site parking??

Response to Comment No. 47-4

Refer to Section B, Off-Site Parking, of Topical Response No. 13, Parking, and Response to Comment No. 47-2. As discussed therein, no off-site parking is proposed.

Comment No. 47-5

The mobility hub is going to be a magnet for crime. Are there any plans set in place in the event the crime rate increases? The City needs to describe how it is going to keep people safe.

Response to Comment No. 47-5

With regard to the security of the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 47-6

Why does the City think people are going to ride the bus and the subway? I work in this area, and virtually everybody drives in their cars alone. Is there any actual evidence that people at this project are going to ride transit? Senior citizens and disabled people use public transportation and I am concerned about their safety and well-being when using public transportation during the time of this project. Will there be any extra steps taken to make Senior citizens and the disabled feel more secure?

Response to Comment No. 47-6

As described in Section IV.K, Transportation, of the Draft EIR, there are several plans, regulations, and programs in support of increasing the availability and use of public transit throughout Los Angeles, including in the area of the Project Site. As described in subsection 2b. Existing Conditions of Section IV.K, Transportation, there are numerous bus lines serving the Project area. The proposed Project includes features specifically designed to encourage and support the use of public transit by employees and visitors of the Project, as well as enhance transportation mobility around the immediate Project Site. Such features are delineated in Project Design Feature TR-PDF-2, beginning on page IV.K-37 of the Draft EIR, and Project Design Feature TR-PDF-3 on page IV.K-40 of the Draft EIR. A key element of those features is the provision of an on-site Mobility Hub, which is proposed as part of the Project to serve Project employees, visitors and audience members, as described on pages II-26 through II-30 of the Draft EIR, to support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and to support other TDM strategies. One of the key functions of the Mobility Hub would be to connect the Project Site to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction, located 0.7 miles from the Site. The design and operation of the Mobility Hub would have security provisions and would include provisions to accommodate any disabled Project employees, visitors, and audience members. Refer to Section B, Transit and TDM Effectiveness, of Topical Response No. 11, Transportation Demand Management, for a discussion of the potential effectiveness of transit and TDM.

Senior citizens, disabled persons, and any other riders requiring additional operator support on the Metro system should not be inconvenienced by Project operations. The comment regarding the safety and well-being of riders when using public transit does not relate to CEQA issues and is not specific to the Project. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 47-7

The traffic section very confusing. Why do members of the public need to wade through an 83-page traffic section? Is the EIR really saying that an average employee only commutes 6.7 miles per day (which means that the average distance from the project site is 3.35 miles)? Why is that buried on page 75 of the traffic section? What is the support for this? Do the people who wrote this live in LA, because it is completely unrealistic. I work in this area, and I know lots of people who commute from places like Santa Clarita, the San Fernando Valley and Orange County. Has the City asked people at the existing study [sic] where they travel from?

Response to Comment No. 47-7

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. Note that while the Regulatory Framework subsections of the Draft EIR are standardized, the total length of any Draft EIR section, and location therein of any Project environmental analysis, reflects the appropriate and necessary amount of information and detail to adequately disclose the Project's potential impacts.

Comment No. 47-8

As a concerned citizen, the best interest of the community is at hand. In all ways I seek to ensure the well-being of the community is upheld. I understand the work that goes behind this project and desire the best for the environment.

Response to Comment No. 47-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 47-2 through 47-7.

Comment Letter No. 48

Dan Agil

Comment No. 48-1

If you ask anyone what their image of Los Angeles is, the answer would be traffic gridlock, human congestion, air pollution and fights over parking spots. This project would make all of those conditions worse FOR THE NEXT 20 YEARS!

Response to Comment No. 48-1

Refer to Response to Comment No. 9-24 regarding the buildout timeline. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment, and Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the proposed on-site parking supply. Construction workers would park on-site during construction.

Refer to Section IV.A, Air Quality, of the Draft EIR for a comprehensive analysis of the Project's potential air quality impacts. As discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips associated with the Project would not approach screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects.

Comment No. 48-2

And beyond this, this massive new project will result in even further development in the general area. The Draft EIR needs to analyze the likely intensification of further development in the surrounding area as a result of this major change to the community plan.

Response to Comment No. 48-2

Refer to Response to Comment No. 13-10 regarding the Project's size. Growth inducing impacts are analyzed in Section VI, Other CEQA Considerations, of the Draft EIR; refer specifically to pages VI-14 through VI-17. As discussed therein, direct and indirect growth-inducing impacts would be less than significant.

Comment Letter No. 49

Norberto Aguilar
317 N. Ogden Dr.
Los Angeles, CA 90036-2130

Comment No. 49-1

This project is scheduled to be built over 20 years, which is twice as long as I have lived here.

Response to Comment No. 49-1

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 49-2

According to the plans, tens of thousands of trucks will have to come up Fairfax to get to the project site. The Draft EIR should analyze the air quality, noise and other issues impacting all the sensitive uses along Fairfax.

Response to Comment No. 49-2

Contrary to this comment, tens of thousands of trucks would not travel along Fairfax Avenue as a result of construction or operation of the Project on a given day. Refer to Section IV.I, Noise, of the Draft EIR regarding the analysis of noise impacts associated with off-site trucks during construction and operation of the Project. As noted in Table IV.I-11, construction traffic noise levels during a peak traffic hour on Fairfax Avenue would be significant during hauling activities. During mat pour activities that would occur for less than five days, construction traffic noise impacts would be significant along Fairfax Avenue, La Brea Avenue and San Vicente Boulevard. As shown in Table IV.I-17, during operation, the Project's traffic noise impacts, which includes trucks, would be less than significant.

Regarding localized air quality impacts, the air quality analysis provided in Section IV.A, Air Quality, of the Draft EIR correctly identified and analyzed impacts to sensitive receptors consistent with the SCAQMD LST methodology. The LST methodology is designed to evaluate localized impacts to sensitive receptors as the result of on-site construction or operational activity. In the case of the Project, on-site construction activity included both off-road equipment (e.g., bulldozer, grader, and excavator) and on-road trucks (e.g., hauling of construction debris and soil and deliveries). Tables IV.A-10 and IV.A-11 on pages IV.A-70 and IV.A-74, respectively, in Section IV.A, Air Quality, of the Draft EIR show that localized construction and operational emissions would remain below

the significance thresholds for receptors located within 25 meters of the Project Site after the application of mitigation. While construction-related trucks would use Fairfax Avenue, this would represent a small fraction of the total emission evaluated in the air quality analysis. As discussed above, the total on-site emissions would result in a less-than-significant localized air quality impact at the closest sensitive receptor (i.e., the Broadcast Center Apartments) and for all sensitive receptors along Fairfax Avenue. Therefore, no additional analysis of trucks along Fairfax Avenue is warranted.

Comment No. 49-3

And besides the construction trucks, what about the constant traffic from the warehouses, theaters, educational facilities and conference facilities/convention center in our neighborhood? The “Mobility Hub” will bring in tons of buses, shuttles and ride-shares. This project will dominate our community and affect our daily lives for decades to come.

Response to Comment No. 49-3

This comment provides a general statement about the condition of traffic in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 14, Construction Vehicle Impacts.

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips.

Refer to Topical Response No. 3, Permitted On-Site Uses. As discussed therein, uses allowed within the Project Site must be consistent with the five permitted land uses (i.e., sound stage, production support, production office, general office, and retail) and the ancillary sitewide uses that support the studio and the five permitted land uses. These uses are fully accounted for in the impact analyses in the EIR. The uses listed by the commenter are neither proposed nor allowed.

Comment Letter No. 50

Yvette Alexander
125 S. Highland Ave.
Los Angeles, CA 90036-3028

Comment No. 50-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 50-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 51

Walter Altamirano
alta_walt@sbcglobal.net

Comment No. 51-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 51-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 52

Liz Alter
646 N. Orlando Ave., #4
West Hollywood, CA 90048

Comment No. 52-1

As a concerned citizen, I am writing to share my concerns about the upcoming community project. The EIR provides details on several aspects of what should take place. However, I still question the impact this development will have on the environment and community.

Response to Comment No. 52-1

This Comment is identical to Comment No. 47-1. Refer to Response to Comment Nos. 47-1 and 52-2 through 52-4 for specific issues raised by the commenter.

Comment No. 52-2

The EIR says more than 5,000 parking spaces are needed but then says that the parking spaces may be offsite. Where are all the people going to park? With 5,000 people needing a place to park, I am concerned about the traffic and congestion that will be caused by this amount of people and cars. Will there be any sort of traffic control? If the parking is offsite, what are the air quality impacts, noise impacts, safety issues from people speeding in the community, pedestrian impacts, and other impacts of off-site parking? The area of parking should be taken into consideration. Will they be in my neighborhood?

Response to Comment No. 52-2

The first two sentences of this comment are identical to Comment No. 47-2, the third and fourth sentences of this comment are nearly identical to Comment No. 47-3, and the fifth sentence is identical to Comment No. 47-4. Refer to Response to Comment Nos. 47-2, 47-3 and 47-4 for responses to the issues discussed in this comment.

Comment No. 52-3

The mobility hub is going to be a magnet for transient people and crime. Are there any plans set in place in the event the crime rate increases? The City needs to describe how it is going to keep people safe. Will there be a police kiosk or other police presence at the mobility hub? People are not going to ride transit unless they feel safe and secure.

Response to Comment No. 52-3

The first two sentences of this comment are identical to Comment No. 47-5. However, with regard to the security of the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 52-4

Why does the City think people are going to ride the bus and the subway? I work in this area, and virtually everybody drives in their cars alone. Is there any actual evidence that people at this project are going to ride transit? Senior citizens and disabled people use public transportation and I am concerned about their safety and well-being when using public transportation during the time of this project. Will there be any extra steps taken to make Senior citizens and the disabled feel more secure?

The traffic section very confusing. Why do members of the public need to wade through an 83-page traffic section? Is the EIR really saying that an average employee only commutes 6.7 miles per day (which means that the average distance from the project site is 3.35 miles)? Why is that buried on page 75 of the traffic section? What is the support for this? Do the people who wrote this live in LA, because it is completely unrealistic. I work in this area, and I know lots of people who commute from places like Santa Clarita, the San Fernando Valley and Orange County. Has the City asked people at the existing study where they travel from?

Response to Comment No. 52-4

The first paragraph of this comment is identical to Comment No. 47-6. Refer to Response to Comment No. 47-6, above.

The second paragraph of this comment is identical to Comment No. 47-7. Refer to Response to Comment No. 47-7, above.

Comment Letter No. 53

Nathan Alyesh
172 N. Formosa Ave.
Los Angeles, CA 90036-2818

Comment No. 53-1

I am a resident of metropolitan Los Angeles who cares about our environment. I am very concerned about the impacts of the proposed TVC studio expansion on our community's public health, as well as its larger effects on climate change.

Response to Comment No. 53-1

The Project's greenhouse gas impacts are fully analyzed in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, and specific issues raised by the commenter are addressed in Response to Comment Nos. 53-2 and 53-3.

Comment No. 53-2

There does not appear to be a clear assessment of the environmental impacts of the construction, as well as the regular effects of the trucks and cars coming and going once the project is finished. Where are the numerous assessments so that the public can understand the range of adverse impacts coming from the project? Just how much carbon will be emitted from all the exhaust created by all the construction vehicles that will be used? And post construction, what will be the likely long-term carbon footprint created by all the additional traffic and vehicles coming and going from around the site? Is anything being done by the developer to mitigate the public health hazards that could arise from all the excess emissions created by this project? Why would the city accept any project with such a large carbon footprint and adverse air quality and climate impacts? Under what basis could the city approve a project like that? Does the city have to determine that some perceived benefits outweigh all of those impacts? When would the city make that determination? Does the public not get a say in the city choosing a project over air quality, public health, and climate impacts?

Response to Comment No. 53-2

The purpose of the Draft EIR is to disclose the potential environmental impacts, including air quality and GHG impacts, associated with the Project.

Refer to pages IV.A-59 through IV.A-73 of Section IV.A, Air Quality, of the Draft EIR and to Appendix B of the Draft EIR regarding the analysis of air quality impacts during

construction and operation of the Project, including the emissions from trucks and cars. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptors.

As stated on page IV.E-76 of the Draft EIR, a total of 14,303 MTCO₂e were estimated for construction activities over the construction buildout. Refer to pages IV.E-80 through IV.A-81 of Section IV.E, Greenhouse Gas Emissions, of the Draft EIR and to Appendix B of the Draft EIR regarding the analysis of GHG emissions during operations of mobile sources. As discussed therein, mobile emissions during Project operations would result in approximately 4,795 MTCO₂e per year. These emissions include an approximately 4,388 MTCO₂e per year reduction due to the incorporation of USEPA MXD VMT reduction features applicable to the Project and the TDM Program (Project Design Feature TR-PDF-2). Other PDFs and mitigation measures, such as Project Design Feature AIR-PDF-1 and Mitigation Measures AIR-MM-1, AIR-MM-2, AIR-MM-3, and AIR-MM-4, would reduce Project GHG emissions. As stated on page IV.E-85 of the Draft EIR, Project-level impacts related to GHG emissions were determined to be less than significant without mitigation. As stated on pages IV.A-59, IV.A-66, IV.A-73, and IV.A-75 through IV.A-77 of the Draft EIR, air quality impacts would be less than significant for all criteria pollutants after the application of mitigation, except for regional construction NO_x emissions, and regional overlapping construction plus operational VOC and NO_x emissions during the long-term buildout scenario. Refer to Section VI, Other CEQA Considerations, of the Draft EIR for a discussion of the reasons why the Project is being proposed, notwithstanding its significant unavoidable impacts.

In accordance with Section 15093(a) of the CEQA Guidelines, CEQA requires the City to “balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered ‘acceptable.’” If the City decides to certify the EIR, it will be required to adopt a written Statement of Overriding Considerations identifying the specific reasons that support its decision. A Statement of Overriding Considerations is typically adopted at the same time that an EIR is certified. With regard to the commenter’s question about the role of the public, the Draft EIR comment response period is an opportunity for public involvement in the decision-making process for the Project under CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during several public hearings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project during these hearings.

Comment No. 53-3

Our planet is sick right now. Our county is in even more jeopardy from all the smog and carbon emissions clustered in the area that make it almost impossible to breath daily. Please respond to these questions that are being raised and ensure the public that their health and the health of our community and the climate is not being threatened by this expansion.

I appreciate your time.

Response to Comment No. 53-3

Section IV.A, Air Quality, of the Draft EIR evaluates the impacts of the Project on air quality, as well as health effects from TACs. Also refer to Response to Comment No. 26-E.1-2 regarding health effects. Impacts of the proposed Project on the climate are addressed in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. As concluded in that analysis, Project-related impacts related to GHG emissions were determined to be less than significant. Refer to Response to Comment No. 53-2 for responses to the specific questions raised by the commenter.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 54

Lisa Anderson
507 N. Harper Ave.
Los Angeles, CA 90048-2222

Comment No. 54-1

I'm writing to express my concern about the planned TV City expansion and how it will affect the neighboring residents of the development. I think that there are still many questions about traffic impacts that have not been addressed in the plan or in the draft EIR. I noticed issues both with which roads the project plans to use and a lack of inclusion of certain features for traffic alleviation.

Response to Comment No. 54-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 54-2 through 54-4.

Comment No. 54-2

For one, it seems most of the traffic will be directed towards Grove Drive, since that is where parking will be located. How much of the traffic for this project will be traveling on Grove Drive. That street seems too small for thousands of new car traffic to get to the property. How will the street have the capacity to handle the traffic? Where is this analysis shown for Grove Drive, ie [sic] how many cars are anticipated? And for the other streets that will have to handle the increased number of cars?

What about the streets in proximity to the Holocaust Museum and Pan Pacific Park, including Grove Drive?—What is the specific plan for how increased traffic will be not only managed, but kept to a minimum because the entire perimeter of the project area is already greatly congested with traffic?

Response to Comment No. 54-2

The comment that most of the traffic would be directed towards The Grove Drive is inaccurate. The parking supply for the Project would be spread out across the Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access to and use of The Grove Drive. The Grove Drive was selected as one of three signalized access driveways for the Project because The Grove Drive has more available capacity than either Fairfax Avenue or Beverly Boulevard. Refer to Response to Comment No. 26-169 for a discussion of the capacity available on The Grove Drive.

The assignment of Project trips to all the streets in the area is shown in Figure 21 on page 77 of the Transportation Assessment (included in Appendix M.1 of the Draft EIR). Figure 22 on page 80 of the Transportation Assessment shows the volumes in and out of each of the Project driveways, showing that approximately 32 percent of the Project trips would use The Grove Drive and The Grove Drive entrance to the Project Site.

The effects of Project trips entering and exiting the Project from The Grove Drive is included in the non-CEQA operational analysis which is summarized in Table 18 on page 162 of the Transportation Assessment. The results show that the three signalized intersections providing access to the Project Site will all operate at LOS B after full buildout of the Project.

Refer to Response to Comment No. 41-4 for a discussion of pedestrian safety to the Holocaust Museum and Pan Pacific Park.

Comment No. 54-3

Couldn't this project also cause problems for people who would like to use these community amenities, like with their access and parking? Any analysis of the impacts of this development is incomplete without a traffic analysis on Grove Drive. Of course all that traffic will spill out onto neighboring roads, how could it not? How much neighborhood spill over is expected and how will it affect residents, and what is being proposed to deal with that?

Response to Comment No. 54-3

A detailed non-CEQA analysis of trips on The Grove Drive is included in the Transportation Assessment (included in Appendix M.1 of the Draft EIR) and is summarized on Table 18 on page 162 of the document. As described in Response to Comment No. 54-2, The Grove Drive has sufficient capacity to accommodate the Project as described in Response to Comment No. 26-169.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips. As discussed therein, the adequacy

of a project's parking supply and cut-through effects are not environmental impacts under CEQA.

Comment No. 54-4

I am also concerned with how close the development will be to many of the apartments in the area. Truck traffic from construction and hauling soundstage equipment will be driving along residential streets, and some of these stages are being planned for right next to apartments. What kind of noise and air pollution will be affecting the apartment residents and other residents? All expected risk of health problems for residents should be made clear—what does the data indicate?

Response to Comment No. 54-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding truck trips during construction and operation.

Refer to Section IV.I, Noise, of the Draft EIR regarding the analysis of noise impacts associated with offsite trucks during construction and operation of the Project. As shown in Table IV.I-11 of the Draft EIR, construction traffic noise levels during a peak traffic hour on Fairfax Avenue would be significant during hauling activities. During mat pour activities that would occur for less than five days, construction traffic noise impacts would be significant along Fairfax Avenue, La Brea Avenue and San Vicente Boulevard. As shown in Table IV.I-17 of the Draft EIR, during operation, the Project's transportation noise impacts, which includes trucks, would be less than significant.

Section 3.d in Section IV.A, Air Quality, of the Draft EIR analyzed localized operational air quality impacts resulting from Project emissions consistent with SCAQMD LST guidelines. As shown in Table IV.A-10 of the Draft EIR, Project localized operational emissions would not exceed SCAQMD significance thresholds at the closest sensitive receptors to the Project Site (i.e., Broadcast Center Apartments), resulting in a less-than-significant impact. Refer to Response to Comment No. 11-26 regarding potential health impacts from Project-related emissions. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptors.

Comment No. 54-5

Please make sure that any deal is one that benefits the people already living near TV City property.

Thank you for your consideration.

Response to Comment No. 54-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 55

Alex Arana
327 N. Stanley Ave.
Los Angeles, CA 90036-2313

Comment No. 55-1

As an LA city resident who often rides my bike and takes my dog for walks, I am extremely concerned about how the Television City project is going to affect my safety and livelihood. Because this area is already so crowded and chaotic, I greatly appreciate the sidewalks and crosswalks. The fact that they may be taken away due to the project's construction is alarming. How are people going to walk places when there are no sidewalks/crosswalks? Considering parking is likely to be a problem as well, how are people supposed to get anywhere at all?

I can imagine that the immense surplus of people will often lead to extreme congestion and driver frustration. This is likely to result in reckless driving, making LA an even less safe place for pedestrians. How is my community supposed to enjoy our city if we are being discouraged to walk or ride bikes in it? In terms of travel, this is not supporting the environment at all. Does this mean people will be expected to drive [sic] places that are within walking or biking distance? How is this going to work when we sit in 20-minute traffic to travel one mile? Not to mention, the streets will also be effected [sic] by this project, so how exactly are we to get from point A to point B?

Yes, the EIR references pedestrian improvements that "may" be included, but at the same time, states the plan "is not finalized." How are we expected to be okay with this lack of information? My community deserves to know how this project is going to affect bike lanes, sidewalks, crosswalks, parking and the streets. We deserve to know what exact areas are going to be impacted by the project and what plans are put in place to make sure LA is still a livable city?

When is the public going to be told what the actual pedestrian improvements are going to be and when will they be done? What about an analysis of the effectiveness of any proposed improvements? The plan includes bicycle improvements that "may" be done but are not final.

When will the community and public know whether and when those improvements are going to be made?

Response to Comment No. 55-1

The Project would enhance safety within and surrounding the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 16-72 and 26-E.4-3 regarding the Project's pedestrian-oriented design and pedestrian safety.

The pedestrian sidewalks would be maintained around the entire perimeter of the Project Site at all times. If construction requires the temporary closure of a section of public sidewalk, a temporary alternate sidewalk would be provided. Refer to Response to Comment No. 16-76 regarding the proposed sidewalk and public realm improvements.

Likewise, no crosswalks would be eliminated either during or after construction. The Project intends to enhance the pedestrian facilities through sidewalk widening and landscaped parkways along both Beverly Boulevard and Fairfax Avenue adjacent to the Project Site.

Construction workers would be prohibited from parking off-site as part of the CTMP to be prepared for the Project pursuant to Project Design Feature TR-PDF-1. During operation, as discussed in Topical Response No. 13, Parking, the proposed on-site parking supply would be sufficient to accommodate the peak parking demands of the Project and would prevent spillover parking.

The Project would not implement any improvements that will interfere with the City's long-range bicycle lanes for the area. No sidewalks or bike lanes would be closed or reduced as part of this Project.

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion and driver delay are not CEQA impacts, and mitigation is not required. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The pedestrian improvements are described in the Draft EIR and depicted in the Conceptual Site Plan. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review.

The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 56

Karen Aspen
511 N. Poinsettia Pl.
Los Angeles, CA 90036-1928

Comment No. 56-1

Regarding the proposal to develop the Television City studios, I have a number of questions about the air quality impacts.

Response to Comment No. 56-1

Refer to Section IV.A, Air Quality, of the Draft EIR for an analysis of air quality impacts and Response to Comment Nos. 56-2 and 56-3, below, for specific issues raised by the commenter.

Comment No. 56-2

The environmental report states that emissions during construction will be significant and unavoidable, and that mitigation will not change that result. It also states that the project will result in a cumulative net increase in pollutants. What will be that cumulative net increase in pollutants? Which pollutants? What are the potential health impacts of those emissions? And how much more is the risk because they will be cumulative?

Will mitigation measures be implemented even if they won't change the significant and unavoidable impacts to less than significant levels, or in that case, are you saying mitigation isn't even done?

One thing not being made clear to the community is that if the construction does go beyond three years and up to the 20 years, as it is likely to, then the project would also result in a cumulative net increase in VOC and NO_x emissions from concurrent construction and operations. What will be the extent or level of these cumulative impacts? Where is the information that shows what those cumulative impacts will be for each year of possible construction and then ultimately? How does that get studied when operations will continue for years?

Response to Comment No. 56-2

As stated on pages IV.A-59, IV.A-66, IV.A-73, and IV.A-75 through IV.A-77 of the Draft EIR, air quality impacts would be less than significant for all criteria pollutants after the application of mitigation, except for regional construction NO_x emissions, and regional

overlapping construction plus operational VOC and NO_x emissions during the long-term buildout scenario. As discussed on page IV.A-77 of the Draft EIR, consistent with SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is non-attainment. As discussed on page IV.A-77 through page IV.A-79 of the Draft EIR, the Project would result in a cumulatively significant impact for regional construction NO_x emissions, and regional overlapping construction plus operational VOC and NO_x emissions during the long-term buildout scenario. Refer to Response to Comment No. 11-26 regarding potential health impacts from Project-related emissions. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptors. Please note that mitigation measures would be implemented even if the measures do not reduce impacts to less-than-significant levels (see pages IV.A-65 to IV.A-66 of the Draft EIR).

Refer to Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline and the long-term buildout impact analysis.

Comment No. 56-3

None of this cumulative impact is being made known clearly to the community. The city should be making sure that the community knows about the impacts to air quality that will come with the project.

Response to Comment No. 56-3

Cumulative impacts are analyzed throughout the Draft EIR, including in Section IV.A, Air Quality. Refer to pages IV.A-77 through IV.A-80 in Section IV.A, Air Quality, of the Draft EIR for an analysis of cumulative air quality impacts.

Comment Letter No. 57

Laura Assael
318 S. Mansfield Ave.
Los Angeles, CA 90036-3057

Comment No. 57-1

Before you make decisions about allowing the Television City expansion project, I want to make my concerns known. I am a resident whose voice should be heard.

Response to Comment No. 57-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 57-2

The Television City expansion Draft EIR is confusing and unclear. When is the city going to hold public hearings so that the community can really understand what the project will do? Why is there no specific plan required, a plan that provides details rather than general descriptions? How are we supposed to understand impacts of a development that lacks specifics about what is going to be built and the effects? What does getting a Specific Plan mean and why can it lack specifics? Seems contradictory. Please explain exactly how the current codes or zoning for this building and for the property would be changed from what is in place now for this proposed project?

Response to Comment No. 57-2

Refer to Response to Comment No. 32-3 regarding the noticing of the Project in compliance with CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings, the dates of which will be published in accordance with the City's noticing requirements.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to how the Project Description fully complies with CEQA and provides sufficient details to fully evaluate the environmental impacts of the Project and why neither CEQA nor City policy requires a draft Specific Plan to be included in the EIR. Also refer to Appendix FEIR-2, Comparison Chart of the Draft

EIR and the Preliminary Draft Specific Plan, of the Final EIR. That comparison confirms that the same physical elements were discussed and analyzed in the Draft EIR. As further discussed in Topical Response No. 1, the Project would establish a Specific Plan, which would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Topical Response No. 1 also includes a discussion of the level of detail required for a specific plan project EIR.

As discussed on page II-36 in Section II, Project Description, of the Draft EIR, the Project includes a General Plan Amendment to designate the Project Site as Regional Commercial and a Vesting Zone Change for the Project Site to the TVC 2050 Specific Plan Zone. Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including, but not limited to, the LAMC, Wilshire Community Plan, and the City's General Plan Framework Element, as well as the compatibility of the proposed uses with surrounding land uses, and concluded that impacts would be less than significant.

Comment No. 57-3

Another concern about this project is that it will lead to more development. If Television City's expansion happens, then the general plan for the community will change, won't it? Will this change open the door to more development? What kinds of development would then be allowed? How does the EIR address how this development will lead to even more? Does that mean that future projects wouldn't have to be approved? It is not acceptable that the Television City project would be an umbrella project for other projects and development, but is that what would happen?

Response to Comment No. 57-3

Refer to Response to Comment No. 57-2 regarding the Project Description. Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. The proposed General Plan Amendment to Regional Commercial applies only to the Project Site and would not allow for additional development on other sites within the City.

Comment No. 57-4

Parking for the tremendous increase of workers at a new, larger facility will be a problem [sic] The EIR says there are more than 5,000 spaces to be added at the site with more

located offsite. That number of parking spaces doesn't even match the expected number of new employees, so what about those that can't park on site? What does offsite mean? And where is offsite? Will more parking spaces be created in other parts of the neighborhood? If so, how will that impact the area surrounding the project?

Response to Comment No. 57-4

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR. Refer to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply.

Comment No. 57-5

I believe Television City should not increase in size because of the potential for even more development and quality of life impacts for the community.

Response to Comment No. 57-5

Refer to Response to Comment Nos. 57-2 through 57-4 for responses to the specific issues raised by the commenter.

Please note that quality of life is not an environmental impact under CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 58

John Atwater
600 Montgomery St.
San Francisco, CA 94111-2702

Comment No. 58-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 58-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 59

Randy Auerbach
8350 W. Fourth St.
Los Angeles, CA 90048-4203

Comment No. 59-1

Speaking as a long-time resident of this community—more than 25 years—what bothers me most about this project is the incredible traffic that this project is going to bring.

Response to Comment No. 59-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The commenter's specific concerns about traffic are addressed in Response to Comment No. 59-2.

Comment No. 59-2

I looked at the Vehicle Miles Travelled analysis and am not convinced by the unrealistic assumptions. For example, the analysis claims that the average travel distance to a regional movie production facility with 1.5 million square feet of offices is only 3.5 miles. But this makes no sense: many of the studios are in Burbank (Warner Bros, Disney). And Universal City and CBS Radford are in the Valley.

So how can it be that the average trip distance for workers at the studio—many of who live in the San Fernando Valley—will only have an average trip of 3.5 miles?

With all those new daily commuters, 14 stages with performances all year long, construction trucks, and everything else envisioned in the Draft IER [sic] will result in a traffic gridlock.

Response to Comment No. 59-2

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10, regarding the assumptions used in the Project's VMT analysis, including as

related to employee trip lengths. Also refer to Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-E.4-9. As discussed therein, the Project is a continuation and expansion of an existing studio, not an “entertainment center,” and would not attract regional visitor-based trips.

The Draft EIR makes no claim that the average travel distance to a regional movie production facility is only 3.5 miles. In the event that the commenter mistakenly assumed the 6.7 miles result of the work VMT per employee analysis to be a round-trip and approximated the one-way trip distance to be 3.5 miles, the assumption and approximation are incorrect. Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project’s VMT analysis, including as related to employee trip lengths. That topical response includes additional details and an example regarding how work VMT per employee is calculated in the VMT analysis. It should also be noted that the work VMT per employee analysis presented in the Draft EIR is presented in terms of one-way trips; specifically, as stated on page IV.K-30 in Section IV.K, Transportation, of the Draft EIR, “These thresholds—and the VMT analysis to which the thresholds apply—are based on specific types of one-way trips (emphasis added)....” As shown in Table IV.K-5 of the Draft EIR, the work VMT per employee is 6.7 miles, which represents a one-way trip.

There is no recommendation in city or state guidance on VMT analysis to use empirical trip lengths when a model-based solution that combines trip thresholds and Project analysis is available. Critically, it is necessary in conducting VMT analysis that both the thresholds of significance and the Project-level VMT estimates are developed using the same data source in order to ensure an apples-to-apples comparison. Therefore, the VMT analysis presented in the Draft EIR is appropriate and accurate.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for information about audience shows and audience visitor trips. Refer also to Topical Response No. 12, Safety and Congestion, and Topical Response No. 14, Construction Vehicle Impacts.

Comment Letter No. 60

Vanessa Ault
429 N. Orange Grove Ave.
Los Angeles, CA 90036-1743

Comment No. 60-1

I read about a settlement agreement between the LA Conservancy and the project's developer. Details of the agreement have not been made public, but they should be because this project will profoundly affect the community.

Did the EIR consider the constraints from this settlement agreement? Is the developer paying the Conservancy? How do the limitations of the settlement agreement impact the project objectives? How will development be clustered in the middle of the site if the Conservancy agreement requires set backs from existing buildings? We need to know what is happening at the site.

Response to Comment No. 60-1

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

Comment No. 60-2

There is not enough transparency or clarity with this project!

Response to Comment No. 60-2

The Draft EIR has been prepared in accordance with CEQA and noticing has been provided in compliance with state law. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 32-3.

Comment Letter No. 61

Jesus Avila
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 61-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 61-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 62

Edward Azizi
6530 Drexel Ave.
Los Angeles, CA 90048-4708

Comment No. 62-1

I am writing to express concern over the Television City Project.

Response to Comment No. 62-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 62-2 through 62-5.

Comment No. 62-2

We are staring down the barrel of an enormous construction overhaul that could take up to 20 years to complete.

Response to Comment No. 62-2

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 62-3

While you would expect a proposal of this magnitude to be presented with some amount of clarity and detail, we currently have no idea what exactly they are going to build on that site, and we therefore cannot evaluate the impact that this development could have on our community. We simply do not know enough.

Response to Comment No. 62-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and the proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Comment No. 62-4

Here is what we do know. The EIR says that **any use** in the C2 zones will be permitted. I hoped that would help clarify the site plan, but unfortunately that provision has only muddied the waters further. Permitting any use in a C2 zone leaves the door open for over **100 property uses**, ranging from car washes, to hospitals, to a circus. Each of these uses would have a unique and potentially damaging impact on the lives of residents in the area, and yet no clarity or analysis relating to each of these potential property uses has been provided.

Response to Comment No. 62-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan; Topical Response No. 3, Permitted On-Site Uses; and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan, which were fully disclosed and analyzed in the EIR. As discussed therein, based on input received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses (i.e., sound stage, production support, production office, general office, and retail) as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the EIR.

Comment No. 62-5

We also know that some of this confusion could have been avoided had the community, not just certain parties, been consulted in a meaningful way. Unfortunately, no one has made a good faith effort to inform or educate the actual residents, businesses, or other organizations in the affected neighborhoods about this development. That tells me that the neither the developer nor the governing bodies responsible for reviewing this development are interested in working with members of this community and responding to our concerns.

Response to Comment No. 62-5

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 62-6

I urge you to make a better effort to provide clarity and listen to the members of this community. Please do not move forward until these very basic steps have been taken.

Response to Comment No. 62-6

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 62-2 through 62-5.

Comment Letter No. 63

Samantha Azulay
samazulay@gmail.com

Comment No. 63-1

I am a neighbor and have lived in the 90036 area for the past 10 years. I am Deeply concerned about the TVC 2050 Project.

Response to Comment No. 63-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 63-2 and 63-3.

Comment No. 63-2

I believe that a "Regional Center" designation is inappropriate and respectfully request that the City take more time to review the Draft EIR so that the community can understand this massive project.

Response to Comment No. 63-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Response to Comment No. 32-3 regarding opportunities for public comment. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 63-3

Thank you very much for your time and consideration.

Response to Comment No. 63-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 64

Chanan Back
539 N. Poinsettia Pl.
Los Angeles, CA 90036-1928

Comment No. 64-1

The EIR of the Television City project is reminding me too closely of the Millennium project that took place a couple years ago in Hollywood. Why would the city agree to a project with such poor planning and lack of visions? If there is already so much controversy, questions, and concerns arising from the public, how is the project expecting to gain the support of the actual residents and business that will be most impacted? The potential problems that my neighbors are presenting to the city are not getting answered and haven't even slightly begun to be addressed by the EIR.

Similar to the Millennium project, the Television City project lacks concern for potential environmental effects and disturbance to local neighborhoods.

Response to Comment No. 64-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 64-2 and 64-8. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13 for a discussion of how this Project differs from the *Millennium* project.

Comment No. 64-2

The project fails to take into account the already extremely overcrowded area and the traffic, health and safety concerns that come with this. How is the city able to disregard the already congested community and those concerns?

Response to Comment No. 64-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. A project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA

LOS analysis. Health impacts associated with vehicle trips are addressed as part of the Air Quality analysis included in Section IV.A, Air Quality, of the Draft EIR.

Comment No. 64-3

Where is the evidence that the development plan is accurate, stable, and finite, as required?

Response to Comment No. 64-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-13. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Comment No. 64-4

There is simply not enough information being disclosed for this project to meet the requirements. Where is the case being made that the massive size of what is being proposed fits at all in our neighborhood?

Response to Comment No. 64-4

The Draft EIR was completed in accordance with the requirements of CEQA. Under CEQA, EIRs are informational documents intended to inform the public and decision-makers about the potential environmental impacts of a project and are not intended to make the case for or against any proposed development.

Comment No. 64-5

The planning committee is too quick to saying yes to projects, though in the long run they are making things worse in terms of economic growth, LA's livability and congestive issues.

Response to Comment No. 64-5

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 64-6

I understand that this project could take 20 years of construction. Where is the phasing plan? My community has absolutely no idea what to expect and it's unfair that we are unprepared in what is taking place in our proximity.

Response to Comment No. 64-6

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 64-7

Besides this, can you explain the project design features in full and all of the real impacts that are to come? Are the project design features attempting to cover up the implications that will likely rise from the projects? When will you release mitigation measures? The residents need to review and assess safety measures.

Response to Comment No. 64-7

PDFs are not intended to mitigate impacts, but are commitments made by the Applicant above regulatory requirements. These measures are included in Section IV, Mitigation Monitoring Program, of this Final EIR and will be enforced as conditions of approval for the Project.

The mitigation measures included in the Project are discussed in Section I, Executive Summary, of the Draft EIR; each respective section of the Draft EIR; and Section IV, Mitigation Monitoring Program, of this Final EIR.

For a discussion of PDFs versus mitigation measures, refer to Response to Comment No. 9-34. Additionally, pursuant to Section 15097 of the CEQA Guidelines, Section IV, Mitigation Monitoring Program, of this Final EIR includes all mitigation measures and PDFs discussed in the Draft and Final EIR.

Comment No. 64-8

There is no real definition of the project and this has failed the city in the past. How is a project of this size, scale and volume ever going to serve LA if there is no realistic vision? Please explain why you put out an EIR that went against what the court said in that case the City cannot do.

Response to Comment No. 64-8

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-13. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Comment Letter No. 65

Pamela Bajarski
946 N. Genesee Ave.
West Hollywood, CA 90046-7320

Comment No. 65-1

I have lived in the area for nine years.

Response to Comment No. 65-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 65-2

I do not understand where the 5,000 plus new parking spots are going to go considering there is very limited space already. Because the site is near the farmers market, I fear audience and employee parking is going to disrupt the market's business. How will parking garages and 20-story buildings displace customers? The additional congestion in this area will be a major inconvenience and will turn people away from their once beloved community centerpiece.

Response to Comment No. 65-2

The parking supply provided on the Project Site would be sufficient to accommodate the full parking demand of the Project with no spillover parking into the neighborhoods. Refer to Sections A, Parking Supply, and C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking. There is no evidence offered by the commenter that the Project parking and buildings will displace customers at The Original Farmers Market.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this

Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 65-3

The location of the farmers market is very important and it's extremely disrespectful to the city that we could possibly lose access if the Television City project takes over. People love this market in LA. The appeal of the farmers market will dwindle when 8,000 new people are brought to the area for the entertainment studio. There is a very likely possibility that the market will be lost. The loss of the farmers market would be devastating to the community and California's farmers. What does this mean for local

food economies and how is this helping maximize farmers 'profits? What will happen to all of the vendors when the city takes away their retail opportunity? The market is a major attraction. What is the analysis as to how many people may decide to no longer go there due to the project?

Is there absolutely no concern for highlighting local culture and community gathering places? Where are families going to get access to healthy, affordable foods? In terms of the environment, what does this mean sustainability wise? This does not correlate with California's efforts to fight climate change if we cannot minimize the amount of waste and pollution that comes from producing our food.

This is a historic district and the farmer's market has been here since 1880. It has served not only locals, but also tourists and has allowed them to experience a unique touch of LA. It's undoubtably one of the most beloved landmarks in the city. This farmers market has helped shape LA in so many ways. Are we expected to just accept the loss of prosperity, connectivity, and small business? My community demands that the draft EIR addresses the potential deterioration of the farmers market.

Response to Comment No. 65-3

There is no substantial evidence to support the assertion that the Project would result in a loss of access to or otherwise impact The Original Farmers Market. As discussed in Response to Comment No. 65-2, the Project would not result in the demand for off-site parking and, thus, would not affect parking for The Original Farmers Market. Physical access to The Original Farmers Market would also not be changed as a result of implementation of the Project. In addition, the Draft EIR fully analyzed potential historical resources impacts to The Original Farmers Market in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), and concluded that impacts would be less than significant. Also refer to Section E, Impacts to Historical

Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Draft EIR's analysis of impacts to The Original Farmers Market.

This comment discusses a number of topics that are not related to the Draft EIR's analysis of the potential environmental impacts of the Project. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. 66

Josh Barbash
104 S. Fuller Ave.
Los Angeles, CA 90036

Comment No. 66-1

I would like to express my dismay at the amount of time provided to review such a lengthy and technical document. I appreciate the comment period was extended two weeks, but given the volume of material and the fact that people work and have families, this was not sufficient time to review the Draft EIR in depth. In any case, I have grave concerns about the Draft EIR and the TVC 2050 project.

Response to Comment No. 66-1

Refer to Response to Comment No. 32-3 regarding the public comment period.

Comment No. 66-2

My understanding is that the Wilshire Plan Community Plan Update was to commence this year. Why didn't the project wait until the update of the plan was proposed? If the development agreement proposed for the project is approved for a 20-year period, it seems to make sense to wait and make the project consistent with the updated Community Plan.

Response to Comment No. 66-2

Refer to Topical Response No. 6, Wilshire Community Plan Update, and Response to Comment No. 28-20 with regard to the Wilshire Community Plan update. As discussed therein, CEQA requires an evaluation of a project's consistency with existing land use plans, and that evaluation is not affected by possible changes to an existing land use plan that may be adopted in the future. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including, but not limited to, the Wilshire Community Plan, the City's General Plan Framework Element, and the LAMC, and concluded that impacts would be less than significant.

Comment No. 66-3

It seems unfair to stage haul trucks adjacent to Loyola High School and Kaiser Medical Center. The vibration of these huge trucks may impact medical devices that are sensitive to movement. Was this analyzed in the Draft EIR. Will the truck noise impact the classroom instruction? How and why was this location selected?

Response to Comment No. 66-3

The two off-site staging areas are no longer proposed to be used as part of the Project's construction activities. Instead, all haul truck staging would occur on-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, and refer to Response to Comment No. 26-24 for a discussion of on-site construction haul truck staging.

Comment No. 66-4

Will the trucks be idling near any open playing fields at the school which may impact the air quality students would be subjected to? Staging hundreds of trucks adjacent to these sensitive uses is something that should have been fully analyzed in the Draft EIR. Where are these analyses located in the Draft EIR?

Response to Comment No. 66-4

Refer to Response to Comment No. 26-24 regarding haul truck staging areas. As discussed therein, all haul truck staging would occur on-site per LADOT's approval letter dated June 30, 2022 (see the LADOT Haul Route Approval Letter included in Appendix M.5 of the Draft EIR). The two off-site staging locations described and evaluated in the Draft EIR are no longer proposed. Accordingly, there would be no off-site idling. As such, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. The removal of the staging locations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 66-5

I am sure there will be special events at the project site but did not see any specific information about that in the Draft EIR. How many special events will be proposed per year? Is there a limit as to the number of attendees for special events? Where will these attendees park? What time will these events be scheduled e.g., in the evenings, on weekends, etc.? Will a calendar of events be posted on the project's website to inform the adjacent neighbors of potential noise and light impacts? How can this information be disseminated to the neighbors and the public? Where is this information provided in the Draft EIR? Were the impacts of these events to the surrounding residential neighbors analyzed?

Response to Comment No. 66-5

Refer to Topical Response No. 3, Permitted On-Site Uses, with regard to the permitted on-site land uses, including special events. Special events would not be

regulated by the proposed Specific Plan, do not regularly occur on-site, and would be subject to existing City permitting regulations.

Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 66-6

Thank you for the opportunity to comment on the TVC 2050 Draft EIR. It is my hope that my comments and concerns will be addressed

Response to Comment No. 66-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 66-1 through 66-5.

Comment Letter No. 67

Raymond Bardeau

Comment No. 67-1

We're already experiencing unmitigated growth and nonstop traffic congestion. I'm concerned that moving on this new Television City Project application is too much, too fast.

Response to Comment No. 67-1

This introductory comment has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 67-2.

Comment No. 67-2

We need more time to understand the long-term community and environmental impacts. A decision of this magnitude should be made with extreme caution and not rushed.

Our community should have time to review the information and provide appropriate feedback. The project will be so impactful to our neighborhood that residents and businesses should be given the opportunity to really understand what is being proposed. Why is there no public hearing scheduled to go along with the recent environmental report that came out? I'm respectfully asking you to delay approval and hold public hearings now, not later when the process is farther along.

Response to Comment No. 67-2

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day required under CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during public hearings and meetings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings, the dates of which will be published in accordance with the City's noticing requirements.

Comment Letter No. 68

David Barlag
448 S. Orange Dr.
Los Angeles, CA 90036-3510

Comment No. 68-1

I'm heartbroken this morning as I read about the new development happening in my backyard.

Response to Comment No. 68-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 68-2 through 68-6.

Comment No. 68-2

What is this new Television Studio Project? I'm struggling to find any exact details about it. The information I was able to find is full of red flags.

Response to Comment No. 68-2

The Project would establish the TVC 2050 Specific Plan to allow for the continuation of the existing studio use and the modernization and expansion of media production facilities within the approximately 25-acre Television City studio (Project Site). The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space. The Draft EIR for the Project was circulated for public review on July 14, 2022, until September 13, 2022, and is available on the City's website at <https://planning.lacity.org/development-services/eir/tvc-2050-project-0>. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 68-3

It's obvious that this development, despite its details, will exacerbate already current problems throughout our community. Yes, LA is congested everywhere, but why submit our neighbors to a plan that will exaggerate it and make it even worse? What sense does that make? The kind of development that is being considered is massive for our already

highly congested area. How does this development mesh with what you are supposed to be doing to manage traffic congestion in our city? Doesn't the city have a congestion management plan it is supposed to follow? Surely you all know about the consequences that follow—decrease in air quality, increase in noise, etc.

Response to Comment No. 68-3

This comment provides a general statement about the condition of traffic in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 5-8 regarding the compatibility of the Project with the surrounding community.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

Comment No. 68-4

As leaders, please inform us neighbors, where we can expect these employees and customers to park? Will this be in my backyard? In the parking be in my neighborhood? [sic] Have you all experienced rush hour in LA as it is now? Please help me understand how the city leaders have our interest in mind at all when it comes to parking and this project.

Response to Comment No. 68-4

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to meet the peak parking demands of the Project, which also explains that off-site parking is no longer proposed. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 68-5

As a mom in this neighborhood, how is the construction portion of this project going to affect my children? We're constantly seeing things in the news about products, foods, ways of travel, etc. that are scientifically proven to be bad for our health. Please explain

the negative impacts of all the trucks, chemicals, and run off and other construction related effects that are expected with this project. None of that is good for our kids!

What are you going to do to ensure their health and safety during all of the construction? And when the development is finally done, what about the health and safety while so many people and cars will be going to that location? Please provide information about the risks that were identified during both those times and impacts of what is going to be done. It's not enough to say that the develop is going to keep impacts as low as possible. There shouldn't be any impacts—that's just making the community live with the impacts.

Response to Comment No. 68-5

An analysis of construction traffic impacts was included in the Transportation Assessment included as Appendix M.1 of the Draft EIR. Refer to Section 5D, pages 179 through 184 of the Transportation Assessment. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the impacts of construction trucks and construction worker vehicles on the traffic conditions along the roadways serving the Project Site, as well as safety during construction. As discussed therein, Project trip generation during construction would be less than the Project when fully operational, and, thus, would have a lesser effect on traffic than the Project as analyzed in the Transportation Assessment and Draft EIR.

Potential health and safety impacts related to construction are thoroughly addressed in the Draft EIR. With regard to health and safety related to localized air quality emissions, refer to Response to Comment No. 16-12 regarding how the Project is not expected to worsen air quality in the region as potential operational localized air quality impacts would be less than SCAQMD's significance criteria for all pollutants.

Comment No. 68-6

Enough is enough. Be the leaders we need in this world. Help us stop this project, not only for the current neighborhood, but for the future of our kids, city, and home [sic]

Response to Comment No. 68-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 68-2 through 68-5.

Comment Letter No. 69

Barbara Bartnof
barbarabartnof@gmail.com

Comment No. 69-1

Stop the expansion of CBS [sic]

Response to Comment No. 69-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 70

Laura Basmajian
lbasmajian@tvcityla.com

Comment No. 70-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 70-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 71

David Bass
434 N. Detroit St.
Los Angeles, CA 90036-2529

Comment No. 71-1

I have questions about the TVC application and how you will handle future calculations and revisions.

Response to Comment No. 71-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 71-2.

Comment No. 71-2

How will you handle changes to their building plans in the future? Will any proposed changes be assessed for changes to impacts? How will the public be made aware and provided an opportunity to review the changes and their impacts?

Will you provide the community with updates as specifics about changes to the development, about new and changed impacts is determined? What will the timeline look like for receiving updates?

We really need in-depth information before this process is allowed to continue.

Thank you for your time.

Response to Comment No. 71-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR analyzed the proposed development program described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 of the Draft EIR and specifically Table II-2, Proposed Development Program, on page II-13). Future Project changes that are substantially different than the proposed Project or are beyond the scope of impacts evaluated in the EIR would require additional City review and approval, as well as potential CEQA compliance review.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 72

Regina Bass
434 N. Detroit St.
Los Angeles, CA 90036-2529

Comment No. 72-1

I have questions about the TVC application and how you will handle future calculations and revisions.

Response to Comment No. 72-1

This comment is identical to Comment No. 71-1, but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 72-2

1. Why aren't basecamp and below ground development part of what is considered in the planned square footage? Is that part of the current building considered floor area now? How did they calculate proposed and existing uses and square feet? Are they treating those calculations differently because they aren't all the same uses?

Response to Comment No. 72-2

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 with regard to the definition of floor area under the proposed Specific Plan; how all of the proposed uses, areas, and activities have been fully accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area; and how no active production activities would be located in the parking and basecamp areas below Project Grade.

Comment No. 72-3

3. [sic] Did the EIR consider the construction and operation impacts from areas that the EIR says are not floor area? I can't tell. And if those areas were not evaluated for impacts, then the EIR minimizes the project's impacts. If they did, where is the information about those impacts? If not, then the analysis isn't completed and needs to be redone and recirculated.

Response to Comment No. 72-3

Refer to Response to Comment No. 72-2 regarding floor area.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 72-4

We really need in-depth info before this process is allowed to continue.

Thank you for your time.

Response to Comment No. 72-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 72-2 and 72-3.

Comment Letter No. 73

Abbe Bauer
306 S. Citrus Ave.
Los Angeles, CA 90036-3036

Comment No. 73-1

I am deeply concerned for the future of the Beverly Fairfax Historic District if the TVC project proceeds as planned in the EIR. My concerns about this project primarily focus on overdevelopment issues that have not been fully outlined by the developer. As someone who has lived in the community for many years, it makes me uneasy to think about all of the changes that are proposed for our community. I have listed specific questions that I believe the community needs answers to.

Response to Comment No. 73-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 73-2 through 73-5.

Comment No. 73-2

Construction. I am worried about the ambiguity within the EIR. What is the first building stage of the project and when will this be completed? How will project updates be given to residents living in Beverly Fairfax? Furthermore, I am interested in the logistics of the construction. Will construction take place seven days a week? Will construction be closed on any major national holidays? I am concerned about the noise level of construction as it may disrupt the learning of our school children. How close is the proposed building to Fairfax High School?

Response to Comment No. 73-2

Refer to Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR and Response to Comment No. 9-24 regarding the Project timeframe. See also Topical Response No. 14, Construction Vehicle Impacts.

Noise impacts, including related to construction noise, associated with the Project are discussed in Section IV.I, Noise, of the Draft EIR. As discussed on page IV.I-35 of the Draft EIR, in accordance with LAMC requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between

8:00 A.M. and 6:00 P.M. on Saturday or national holidays, or outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners. Nighttime construction would be limited to that necessary for mat pour activities and would occur for a maximum of up to five days. Project Design Features NOI-PDF-1 and NOI-PDF-2, which address construction-related noise, are described on page IV.I-34 of the Draft EIR.

As discussed on pages I-23 and I-24 in Section I, Executive Summary, of the Draft EIR, as part of Project Design Feature TR-PDF-1, a detailed CTMP, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The CTMP will formalize how Project construction will be carried out and identify specific actions, including appropriate signage, that will reduce effects on the surrounding community. In accordance with Project Design Feature TR-PDF-1, the Applicant will designate a construction relations officer to serve as a liaison with the surrounding community and respond to any construction-related inquiries.

Fairfax High School is located approximately 0.25 miles north of the Project Site.

Comment No. 73-3

Inclusivity initiatives. As of July 31st, 2022, Los Angeles had an unemployment rate of 5.2%. Do the developers plan to prioritize Los Angeles tax paying residents as they search for workers? What do these plans entail?

Response to Comment No. 73-3

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 73-4

I am also concerned that these building plans will exclude low income families from the community. Will any of the housing being built be reserved for low income families? If not, why not?

Response to Comment No. 73-4

The Project does not include the development of housing. Refer to Section II, Project Description, of the Draft EIR for a detailed description of the Project and its underlying purpose.

Refer also to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site and the underlying purpose of the Project.

Comment No. 73-5

Densification. Our community is already quite populated, and learning about the increase concerns me about overpopulating our area. It seems like nothing is stopping these developers from overdeveloping and overpopulating our neighborhood. It's already such a congested area. Why is the city considering allowing a project that would require so many more people to commute to the site, workers to getting to the site during years of construction?

Response to Comment No. 73-5

This comment provides a general statement about the population density in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

As discussed in the Draft EIR, construction is anticipated to take place over 32 months. Refer to Topical Response No. 14, Construction Vehicle Impacts.

With regard to population, as discussed in Section XIV of the Initial Study included as Appendix A to the Draft EIR, the Project is a studio use and, thus, would not directly increase the residential population in the Project vicinity. While some new Project employees may be anticipated to relocate to the Project vicinity, many would not; similarly, existing employees would not be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial.

The City is required to review all applications submitted, including the Project. The Draft EIR was prepared as an informational document to inform the public and decision-makers about the potential environmental impacts of the Project.

Comment No. 73-6

I am already looking forward to hearing from the developers about their plans. Please keep me informed on all project updates, specifically to the EIR

Response to Comment No. 73-6

The commenter has been added to the mailing list for the Project and will receive all future public notices regarding the Project prepared by the City. In addition, the City will continue to properly maintain the administrative record for the Project.

Comment Letter No. 74

Christopher Becker
1720 N. Fuller Ave., Apt. 544
Los Angeles, CA 90046-3078

Comment No. 74-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 74-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 75

Catherine Bergmann
556 N. Croft Ave., Apt. 8
West Hollywood, CA 90048-2542

Comment No. 75-1

I am so dismayed that this project seems to be moving forward since the community is almost uniformly and strongly opposed—

Response to Comment No. 75-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 75-2 through 75-3.

Comment No. 75-2

it seems totally unbelievable that the City would be willing to green-light this massive project that will take 20 years to build, use up so much of our groundwater resources, pollute our air, allow for near-constant noise, fill our streets with cars and construction trucks, and grab every parking spot.

Response to Comment No. 75-2

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

This comment provides a general statement about groundwater, air quality, noise, traffic, and parking but does not raise any specific issues. Each of these topics were fully analyzed in the Draft EIR with the exception of parking, which is not an environmental impact under CEQA. The Project's proposed parking is discussed in Section II, Project Description, and Section IV.K, Transportation, of the Draft EIR; refer also to Topical Response No. 13, Parking, regarding the sufficiency of the proposed onsite parking to meet the peak demands of the Project, which would prevent spillover parking. In the Draft EIR, refer to Section IV.G, Hydrology and Water Quality, for a discussion of groundwater resources; Section IV.A, Air Quality, for a discussion of air quality; Section IV.I, Noise, for a discussion of noise; and Section IV.K, Transportation, for a discussion of traffic. This comment is, nevertheless, noted for the administrative record and has been incorporated

into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Also, note that the Project has not been approved by the City. The Project has not received any recommendation by the Department of City Planning, the City Planning Commission, or the City Council. Under CEQA, an EIR is an informational document intended to inform the public and decision-makers about the potential environmental impacts of a project and is not intended to make the case for or against any proposed development.

Comment No. 75-3

As someone who has lived here for 21 years—what about our quality of life and the walkability of our neighborhood? Will kids be able to walk to school and religious people feel safe to walk to services? Has the Draft EIR really thought about the impact on our lives

Response to Comment No. 75-3

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security. With regard to pedestrian safety, refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion.

The remainder of this comment discusses a number of non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 76

Sara Berthialilue
537 N. Orlando Ave., Apt. 4
Los Angeles, CA 90048-2530

Comment No. 76-1

As a resident of Fairfax, I am very concerned with how this project will impact surrounding areas that I have grown to love over my time here.

Response to Comment No. 76-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 76-2 through 76-5.

Comment No. 76-2

Just north of the project site, there is a historic district. As a result of the projects, hundreds, if not thousands, of cars and trucks will be traveling through the neighborhood. What will happen to the historic district? Is parking going to overflow into the historic district? What specific measures are you taking to ensure that the historic district is not going to be impacted by this project? Residents of this community value the district, and we want to ensure that it does not change too much as a result of the project.

Response to Comment No. 76-2

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 26-E.2-10 and 43-2 regarding how the Project would not result in any significant impacts to the Beverly Fairfax Historic District.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the Project's proposed NTMP. As discussed therein, the Applicant would work closely with LADOT and the residents in the two neighborhoods during the development of the NTMP to identify potential adverse local street effects (e.g., cut-through trips, speeding, stop sign violations) and evaluate the measures available to minimize these issues. The requirement to prepare an NTMP for the two neighborhoods identified in the Draft EIR, in cooperation with the potentially affected neighbors, will be incorporated as a condition of approval for the Project.

Refer also to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply and that spillover parking into adjacent neighborhoods and properties is not anticipated. As discussed therein, existing spillover appears to be caused by an existing grocery store with inadequate parking and the Project Site will have sufficient parking supply on-site to accommodate its full demand and therefore its employees and visitors will not be searching for off-site parking. Currently, no spillover parking occurs from existing operations at the Project Site based on the observations of traffic engineers and this is expected to continue given the proposed parking supply in the future.

Comment No. 76-3

Additionally, in the draft EIR, it says that there are going to be “fueling stations and vehicle repair.” Is this going to be a fully fleshed out gas station and mechanic shop? Where exactly are they going to be located? What are the environmental risks associated with building a fueling station near properties? How are you going to ensure there are no fuel leaks that impact the health of nearby citizens? What fire safety protocols are you taking to ensure that this station is completely safe?

Response to Comment No. 76-3

The Project would not include a fueling station or vehicle repair facilities. The allowed uses have been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 76-4

Lastly, we have taken strides as a community to become more environmentally conscious. The plan states that you will use natural gas. Yet, building is supposed to go on until 2043. We want to be electric-run to help combat climate change. This massive project is regressive in terms of fighting global warming. How are you going to build and develop in a sustainable way, and how will you make sure that Fairfax isn’t contributing to the larger issue of global warming?

Response to Comment No. 76-4

The Project’s potential impacts related to climate change are fully analyzed in Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. Impacts were determined to be less than significant. Refer also to Response to Comment No. 26-51 regarding the analysis of natural gas usage, GHG emissions, and the City’s new all-electric buildings ordinance.

Refer to Response to Comment No. 9-24 regarding the Project's construction timeline.

Comment No. 76-5

And lastly, [sic] Fairfax is a peaceful community. Yet, operations from this project are going to be noisy. What steps are you going to take to ensure that noise levels do not increase? Are you going to soundproof areas? When operations occur outside, how are you going to make sure that noise doesn't bother us? Are you going to have non-operational hours to ensure we aren't disrupted during non-work hours?

Response to Comment No. 76-5

Noise impacts during operation of the Project were analyzed based on the thresholds in Appendix G of the CEQA Guidelines and were determined to be less than significant. Refer to pages IV.I-43 through IV.I-56 of Section IV.I, Noise, of the Draft EIR. The Project would include a number of PDFs that would reduce noise during operations. Refer to page IV.I-34 of the Draft EIR.

Refer to Response to Comment No. 26-146 regarding noise associated with outdoor production activities during both daytime hours (7:00 A.M. to 10:00 P.M.) and nighttime hours (10:00 P.M. to 7:00 A.M.).

Comment No. 76-6

Please answer the questions above to give us more confidence that this project won't completely ruin our community.

Response to Comment No. 76-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 76-2 through 76-5.

Comment Letter No. 77

Alex Bidar
935 N. Genesee Ave., Apt. 2
West Hollywood, CA 90046-7348

Comment No. 77-1

I am very upset with how the proposed TVC project is proposed to run. There will be traffic and public parking issues as well as the increase in emissions that it will create.

Response to Comment No. 77-1

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding parking, under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, off-site parking is not needed to meet the Project's parking demand, and the Project does not propose off-site parking.

Regarding emissions, refer to Section IV.A, Air Quality, of the Draft EIR.

Comment No. 77-2

Building of the development could go on until 2043. If that is the case, why is the developer not considering multiple energy sources? I don't understand why the developer is planning to use natural gas. Shouldn't we strive to have new buildings that are fully electric in order to combat climate change? Why wouldn't the project be required to fulfill climate action objectives?

Are there other things the developer is going to do to offset the environmental damage that will occur as a result of usage of natural gas? For example, why not use electric vehicles during the duration of the project? What about electric trucks? I feel that if the project is going to use natural gas, the developer should be required to offset the negative contributions.

Another fear I have related to this is how the neighborhood will lag behind in the fight against climate change. What similar developments are happening around the country? What type of energy are they using? Will our area be less sustainable as a result of this project?

Response to Comment No. 77-2

This comment is identical to Comment No. 45-1. Refer to Response to Comment No. 45-1, above.

Comment No. 77-3

Similarly, the usage of natural gas requires high levels of maintenance and surveillance in order to ensure safety. What procedures and standards will be put in place to ensure the safety of Fairfax residents living near the project site? How will the safety of workers be ensured who are going to be even closer to the natural gas?

Response to Comment No. 77-3

This comment is identical to Comment No. 45-2. Refer to Response to Comment No. 45-2, above.

Comment No. 77-4

The developer has both the opportunity and responsibility to change the way in which he operates in order to make our world a more sustainable one. At the moment, it seems like he is making no effort to do so. Please explain in great detail all of the environmentally friendly aspects of this project. Similarly, please provide a new energy plan so that natural gas is not being used up until 2043.

Response to Comment No. 77-4

One of the Project's objectives is to "[c]reate a model for environmental sustainability in modern production studio operations by implementing best management practices regarding water, energy, and resource conservation by achieving LEED Gold certification or equivalent green building standards" (page II-11 of the Draft EIR). As discussed on page II-33 in Section II, Project Description, of the Draft EIR, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code), and pursuing U.S. Green Building Council's LEED Gold certification or equivalent green

building standards. The Project represents an infill development located in close proximity to existing and proposed transit lines and would utilize existing infrastructure to service the proposed uses. The Project also involves the re-use of certain existing buildings and facilities. Both in compliance with and, in some cases, in exceedance of regulatory requirements, a number of specific sustainable design components would be incorporated into the Project, including, but not limited to: Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; EV charging infrastructure; a TDM Program; the proposed Mobility Hub; use of daylighting where feasible; energy-efficient lighting; and permeable paving where appropriate. Such measures would address energy conservation, water conservation, and waste reduction and are further discussed throughout the Draft EIR.

In addition, the Project would be among the first studios built in the City in accordance with the City's new all-electric buildings ordinance. Refer to Response to Comment No. 45-1, which details the additional sustainability features included in the Project and new natural gas usage associated with the Project.

The Draft EIR comprehensively analyzed the Project's potential energy impacts in accordance with CEQA and concluded that impacts would be less than significant. Thus, a new energy plan as requested by this commenter is not warranted.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 77-5

I am confident that most of the Fairfax community wants to have an active role in addressing global warming. As it stands, this development seems like we would be doing exactly the opposite

Response to Comment No. 77-5

This comment is identical to Comment No. 45-3. Refer to Response to Comment No. 45-3, above.

Comment Letter No. 78

Asher Biron
420 N. Formosa Ave.
Los Angeles, CA 90036

Comment No. 78-1

I'll be frank, I don't understand the traffic analysis provided with the draft EIR for the TVC 2050 project. The traffic plan provided as part of the draft EIR doesn't give any indication how traffic will be re-routed. It also doesn't take into account special events when traffic counts are heaviest or trash collection days. How will first responders navigate the neighborhood when its gridlocked?

Will the developers provide additional detail to back up their claims?

Response to Comment No. 78-1

Section IV.K, Transportation, of the Draft EIR and the Transportation Assessment (Appendix M.1 of the Draft EIR) analyzed the potential transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would have less-than-significant transportation impacts.

There is no traffic re-routing planned as part of the Project. Future base traffic conditions were projected, and Project trips were added on top of that future base to determine the maximum impacts of the Project on the transportation system.

Trips to/from the Project Site were assigned to the street system on typical weekdays. Refer to Topical Response No. 10, Trip Generation, regarding how special events (not related to the studio) would not be regulated by the Project's Specific Plan and would continue to be regulated on a case-by-case basis by City departments consistent with existing conditions.

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for a discussion of emergency access and vehicle response times. As discussed therein, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations serving the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Comment No. 78-2

The plans for parking during construction don't seem credible to me. Tens of thousands of construction vehicles will be entering the site off of Fairfax. Do we have any idea where these trucks will be staging and idling? What kind of impact will the truck traffic have on noise and air quality? Have the developers communicated at all with any of the schools, residences, and nursing homes along Fairfax regarding the possible disruption to their lives? What have they been told about impacts that will affect them?

Response to Comment No. 78-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of construction worker automobile travel, as well as the construction truck activity levels and parking plans. Refer to Response to Comment No. 35-150 regarding the CTMP. All haul trucks would be staged on the Project Site, and, thus, offsite truck staging would not be required; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The estimate that “[t]ens of thousands of construction vehicles will be entering the site off of Fairfax” overstates the construction vehicle impact. The busiest construction day would occur during the excavation/foundation phase and during the concrete pour for the building foundations. Page 181 of the Transportation Assessment (Appendix M.1 of the Draft EIR) describes the truck and car activity on the busiest construction days when 300 haul truck plus 20 delivery trucks would enter the Project Site. On those days, approximately 245 construction workers would enter the Project Site.¹⁵⁰ The most likely traffic patterns for the construction vehicles would be to enter the Project Site via Fairfax Avenue or Beverly Boulevard and then exit the Project Site on the other street.

Construction worker parking will also be provided onsite. The Project Site is large enough that construction workers in the early phases of construction can park on the surface parking lots on one portion of the Project Site while the excavation is taking place on the other portions of the Project Site.

Air quality and noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. As discussed in Section IV.A, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. All other air

¹⁵⁰ Note that page 181 of Transportation Assessment provided in Appendix M.1 of the Draft EIR has been revised to reflect 245 construction workers on-site instead of 295 construction workers on-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

quality impacts would be less than significant or less than significant with mitigation. As discussed in Section IV.I, Noise, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. All other noise impacts would be less than significant.

Noticing for the Project has been conducted in accordance with CEQA, as discussed in Response to Comment No. 32-3. The Project's Initial Study was circulated for public review from July 2, 2021, to August 2, 2021, and the Draft EIR was circulated for public review from July 14, 2022, to September 13, 2022. Notices were sent to all owners and occupants within a 500-foot radius, as well as all interested parties and designated recipients on the City's standard mailing list. The Applicant also engaged in an extensive outreach program, including Project mailers to over 50,000 households and over 100 community meetings in addition to canvassing residents and businesses to inform the public of the Project.

Comment No. 78-3

According to the draft EIR, almost 8,000 employees will be on site once the production facilities become operational. Up to 5,000 people per day will access the site as television audience members. Yet the draft EIR calls for 5,300 parking spaces on site. Where will everyone else park? How did they arrive at these numbers. Will people accessing the TVC site be allowed to park in adjacent neighborhoods? Will audiences be accessing the facilities during the evening hours? We haven't been provided answers to these questions.

Response to Comment No. 78-3

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nevertheless, Topical Response No. 13, Parking, has been prepared for informational purposes. Refer to Topical Response No. 13 for a discussion of how the on-site parking supply was developed and how audience and visitor parking demand was taken into account. As discussed therein, the Project's parking ratios were developed from empirical parking demand data collected over many years at the Project Site and other studios in Southern California, including NBC Universal, Paramount Pictures, The Culver Studios, Sony Pictures, and several smaller studios. Parking rates have been separated into the components of a studio campus (sound stage, production support, production office, general office, etc.) based on the empirical parking study data collected.

In terms of overall parking demand, it should be noted that not every employee and visitor to the Project Site will arrive by automobile and certainly not alone in their cars. Thus, the Project does not need one space for every person arriving at the Project. Employees and visitors will carpool to the Project Site and a percentage of the arrivals

would be by transit, bike and walk, again reducing the need for on-site parking. The proposed 5,300 parking spaces would be sufficient to accommodate the peak parking demand of the Project.

In reference to the question regarding evening audience shows, the Project Site accommodates evening audience shows today and that practice is expected to continue in the future. Audiences for nighttime tapings arrive at the Project Site during the late afternoon or early evening, and evening tapings are generally completed by 10 P.M. The comment regarding the number of audience members is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding audience trips and the timing of existing audience shows.

Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking, addresses the concern about spillover parking into the neighborhoods. As discussed therein, existing spillover appears to be caused by an existing grocery store with inadequate parking and The Grove shopping center that charges for parking. The Project Site will have sufficient parking supply on-site to accommodate its full demand, and, therefore, its employees and visitors will not be searching for off-site parking. Currently, no spillover parking occurs from existing operations at the Project Site based on the observations of traffic engineers, and this is expected to continue given the proposed on-site parking supply in the future.

Comment No. 78-4

I hope you'll demand answers from the developers to my questions. I also hope you'll demand the developers do a better job of communicating with neighborhood residents and business owners. The more I learn about TVC 2050, the more concerned I become. Please don't let this project move forward until our questions are answered.

Response to Comment No. 78-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 78-1 through 78-3.

Comment Letter No. 79

Chani Biron
320 N. Formosa Ave.
Los Angeles, CA 90036-2527

Comment No. 79-1

I have serious issues with the proposed Television City rebuild and the recent EIR associated with it. As a 20 year resident. I can see so many ways that this could go wrong for an important part of the city. In addition to being a heavily residential area, where the local residents' safety and quality of life should be the prime concern, the area is the home to several important cultural points.

Response to Comment No. 79-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 79-2 through 79-4.

Comment No. 79-2

These include the Holocaust Museum. What is going to be the impact on the venue of the expected increase in traffic and removal of some parking along nearby streets? Will it be more difficult for visitors to get to the museum because of backed-up cars, detours and lane closures?

Has there been any consideration about how all of the construction activities will impact the Holocaust Museum? Of particular concern is how traffic and parking issues will impact the ease with which people, particularly groups of students, visit the Holocaust Museum. Not only is this an important cultural center in our community but the education it provides is needed now more than ever. Are there plans to study all of the different impacts the project will have on the museum? What mitigation systems are being considered to make sure this important museum is not hurt by the project?

Response to Comment No. 79-2

Refer to Response to Comment No. 41-4 for a discussion of the potential effects on the Holocaust Museum. As discussed therein, the Holocaust Museum drop off takes place on the east side of the roadway in a bus bay offset from the northbound through lanes. The school children are dropped off on a sidewalk adjacent to the Holocaust Museum and

would not have to cross The Grove Drive. For pedestrians approaching the Holocaust Museum from the west side sidewalk, a protected marked crosswalk would be incorporated into the traffic signal controlling the entrance to the Project.

The Holocaust Museum and Pan Pacific Park were included as sensitive receptors in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR. As discussed in Section IV.A, Air Quality, of the Draft EIR, the Project would not result in significant localized air quality impacts. As discussed in Section IV.I, Noise, of the Draft EIR, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. However, noise impacts at the Holocaust Museum would be less than significant with implementation of Mitigation Measure NOI-MM-1 that requires installation of noise barriers during construction; vibration impacts at the Holocaust Museum would be less than significant.

Comment No. 79-3

There are going to be so many trucks coming into the area during construction. What steps is the city taking to fully analyze what that number of trucks will do to our air quality—not only from truck emissions during driving but also additional emissions from when they are idling? Because they will be idling since there is so much gridlock on our streets now.

That many trucks will also increase noise and pollution in our neighborhood. What studies are being done to make sure this doesn't damage our community in these ways? What systems will the city put into place to make sure the noise, emissions, dirt and debris from the trucks does not make our neighborhood unlivable? Over what period of time will the impacts be monitored and systems to mitigate be implemented?

Response to Comment No. 79-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction truck trips. Tables IV.A-6 and IV.A-8 in Section IV.A, Air Quality, of the Draft EIR present, respectively, the unmitigated and mitigated regional criteria air pollutant emissions associated with construction activity, including construction truck trips and any associated vehicle idling. See Table IV.I-11 in Section IV.I, Noise, of the Draft EIR for a summary of off-site noise levels associated with construction truck activity. As discussed in the EIR, various PDFs and mitigation measures, such as Project Design Feature AIR-PDF-1, Mitigation Measures AIR-MM-1 through AIR-MM-4, Project Design Features NOI-PDF-1 through NOI-PDF-5, and Mitigation Measure NOI-MM-1 would reduce air quality and noise impacts of Project construction on the adjacent neighborhoods. Discussions as to why the Project is being proposed notwithstanding significant and unavoidable impacts are presented in Section VI, Other CEQA Considerations, of the Draft EIR. Pursuant to CEQA, a Mitigation Monitoring Program will be implemented, including reporting and/or monitoring

and enforcement procedures, to support the implementation of the Project's PDFs and mitigation measures detailed in the EIR. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR.

Refer to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust. Refer to Response to Comment No. 26-26 for a detailed discussion of the SCAQMD LST methodology and how it is used to evaluate localized impacts to sensitive receptors (residents).

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, which includes mandatory control actions and dust control contingency measures to control fugitive dust.

Comment No. 79-4

North of Television City is an important historic district of Los Angeles! The Beverly Fairfax Historic District needs to be protected as it is so important to the culture of the city. Have the many impacts of both construction and the expansion itself been studied to see how it will impact the homes and businesses within that district? What exactly is going to be done to protect our important cultural centers and this historic district? There is no way a huge project located right in close proximity to the museum and to the historic district won't be impactful and in so many ways.

Response to Comment No. 79-4

The Draft EIR includes a comprehensive analysis of potential impacts from construction and operation of the Project. The assertion that the Project will result in impacts to the Beverly Fairfax Historic District is the opinion of the commenter and is not supported by facts or evidence. Potential impacts to historical resources located in the vicinity of the Project Site, including the Beverly Fairfax Historic District, were considered and analyzed in the Draft EIR. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 26-E.2-10, 28-19, and 363-7. Refer to Response to Comment 79-2 above regarding the Holocaust Museum.

Comment No. 79-5

It is so easy to see this project and think "more jobs" and "more money" but it is important to take a step back and think about the history of Los Angeles, our culture, and important educational centers such as the Holocaust Museum.

Response to Comment No. 79-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 79-2 through 79-4.

Comment Letter No. 80

Paul Bisbano
637 N. Detroit St.
Los Angeles, CA 90036-1947

Comment No. 80-1

As a residents of 30 years my wife Audrey and I live near where Television City's expansion is being considered for this mammoth development, we have many concerns about what that project would mean for our community.

Response to Comment No. 80-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 80-2.

Comment No. 80-2

What does it mean that the site could be a Regional Center? A regional center that would do what? Are there other areas in the city that are also regional centers? Would the regional center be the same boundaries as the Television City site or expand beyond just that development?

Does that mean that other projects would fall under the category of the area being a regional center, not just the one for Television City? Would other projects then not have to go through a thorough review? Would they just get approved or be allowed because they are part of some regional center area?

How does regional center then fit into the city's General Plan? What about the Wilshire Community plan?

It seems that it could lead to uncontrolled growth of our wonderful community. Is that what could happen? How much growth or density would be allowed? Would there be a limit as to how much development could happen?

If a regional center wouldn't be only the Television Center property, it doesn't seem right or fair that an expansion of that designation, which would be hugely impactful on our neighborhoods and community, would be imposed upon us, especially not with a full understanding by community members, businesses and residents of what it would mean.

By what right could the developer do that? On what basis could the city approve that? Is there anything that the residents and businesses can do about it?

Where is an any analysis and findings that our family oriented, small business community needs or wants to be any kind of a regional center?

Response to Comment No. 80-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. As discussed therein, the Regional Commercial land use designation is an existing land use designation within the City's General Plan, and the Project proposes a General Plan Amendment that would apply to the Project Site only and would not allow for development of projects on other sites. Refer to Response to Comment No. 11-3 regarding the size of the Project. The total amount of floor area requested could be granted regardless of whether the land use designation is modified to "Regional Commercial" or utilizes the existing Community Commercial, Limited Commercial, or Neighborhood Commercial designations. See also Topical Response No. 6, Wilshire Community Plan Update, and Response to Comment No. 11-29 with regard to the Wilshire Community Plan update.

Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 80-3

I strongly urge you to oppose this development

Response to Comment No. 80-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 81

Nancy Blecker
nancyb2001us@yahoo.com

Comment No. 81-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 81-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 82

Shelby Blecker
da_kidd@pacbell.net

Comment No. 82-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 82-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 83

Jeff Blum
429 1/2 N. Gardener St.
Los Angeles, CA 90036-5733

Comment No. 83-1

Somehow the traffic section of the Draft EIR takes up 87 pages but doesn't really explain how tens of thousands of trucks, many of them 18-wheelers, are supposed to get through the streets without dedicated right turn lanes to get on-site.

Response to Comment No. 83-1

The comment incorrectly implies that the number of trucks expected at the Project Site on a daily basis would be in the tens of thousands. Topical Response No. 10, Trip Generation, discusses the actual number of trucks expected at the Project Site during operations, which is approximately 83 trucks per day, or approximately 30,000 per year (assuming the maximum number of trucks expected would occur every day), of which approximately 18 would be semi-trucks.

The movement of trucks into and out of the Project Site would be focused on the three Project driveways controlled by traffic signals, which are the locations where pedestrians on the sidewalks are more likely to expect heavier concentrations of traffic. The Project is not proposing additional right-turn lanes to get trucks onto the Project Site, as this would not improve the quality of the pedestrian environment and safety of the pedestrians using the sidewalks adjacent to the Project. The presence of the right-turn lanes allows turns into the Project Site to be made at higher speeds, to the detriment of pedestrians along the sidewalk, and, therefore, such turn lanes are not proposed.

The traffic operations analysis in the Transportation Assessment (included in Appendix M.1 of the Draft EIR) already accounts for the operations of the Project driveways without the additional right turn lanes. Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Once inside the Project Site, trucks would be able to maneuver throughout the Project Site to reach their destination regardless of which side of the Project Site they entered.

Comment No. 83-2

Considering the construction is expected to take 20 years, figuring out dedicated turn-lanes for construction, production and delivery trucks should have been a key feature of the original conceptual plan, and clearly needs more analysis.

Response to Comment No. 83-2

The Draft EIR analyzes a construction buildout scenario of approximately 32 months, as well as a long-term buildout scenario. As stated on page II-36 in Section II, Project Description, of the Draft EIR, and throughout the Draft EIR, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. In a long-term buildout scenario, the Project would be constructed in multiple, non-consecutive phases. As such, the construction of the Project Site would not occur continually over 20 years.

See Response to Comment No. 83-1 above for the rationale for not providing right-turn lanes at all Project driveways. Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering. Further analysis of the driveways and turn lanes would be conducted during the regulatory building permit process as part of the Project's construction drawing set, which would be thoroughly reviewed by the City, including LADOT, for compliance with regulatory standards, including standards that ensure safe operations.

Comment No. 83-3

And beyond the trucks, will be a massive increase of passenger vehicles coming to the site every day, many commuting from San Fernando Valley and Burbank. And it's clear that traffic won't just be during rush hour, if there are studio performances every night. This traffic plan needs to be reconsidered.

Response to Comment No. 83-3

Refer to Topical Response No. 10, Trip Generation, regarding the Project's trip generation estimates. Please note that, as discussed in Topical Response No. 8, Vehicle Miles Traveled, the Project would not attract regional trips.

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

In addition, studio performances every night are not anticipated. The schedule for audience shows and studio events are expected to be similar to today's conditions. Refer to Sections B, Visitor Trips, and C, Special Events, of Topical Response No. 10, Trip Generation.

Comment Letter No. 84

Avi Blumenstein
411 S. Orange Dr.
Los Angeles, CA 90036-3509

Comment No. 84-1

I am writing about the proposed development for Television City. I have more questions than there is space in this letter, but suffice it to say the draft Environmental Impact Report reveals the many inconsistencies and gaps in information about the project.

Response to Comment No. 84-1

This comment introductory comment claims the Draft EIR includes inconsistencies and gaps in information, but provides no examples. The Draft EIR was prepared in accordance with the requirements of CEQA and fulfills CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the potential environmental impacts of the Project. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 84-2

The project is required to be consistent with the Mobility Plan. Among the many concerns and question I have are:

The draft EIR refers to building a 3-ft wide public sidewalk easement, in addition to a 7-ft public right-of-way, to provide a 10-ft sidewalk. The plan then acknowledges the 10-ft wide sidewalk would be narrower than the 13-ft wide standard in the Mobility Plan, but it would increase the existing 9-ft sidewalk width. Why would it be acceptable that the developer is not meeting the 13-ft wide sidewalk standard in the mobility plan, using the rationale that he is at least increasing the existing sidewalk width by one foot? Does the city find it acceptable that the standard of 13-ft wide sidewalk, set forth as a standard in the mobility plan, is not met? On what basis would the city allow the standard to not be met? Does the city expect that the community would be ok with a standard not being met because at least it improves an existing condition or situation?

And to drive the point home even more clearly, we are talking about a requirement not being met to at least improve a sidewalk width that current is already not compliant! Please explain if there is any other way to view what I am gleaned regarding this situation.

Yet another example is the developer's request for a waiver of dedication for the additional width of Grove Drive when proposing to widen the 30-ft width of the current right-of-way by 2 feet, though it would still not meet the 33-ft requirement in the Mobility Plan.

Is this the kind of substandard and nonconforming planning the city is willing to accept, to go along with? If so, you are implicitly expecting the community to do so as well. Otherwise, you either aren't paying attention or are hoping that we are not. On what basis can the city approve standards not being met?

Response to Comment No. 84-2

Refer to Response to Comment Nos. 26-133 and 26-E.4-7 regarding sidewalk width on The Grove Drive and the waiver of dedication request included with the Project's Vesting Tentative Tract Map application.

Comment No. 84-3

The community should be aware that approval of requested waivers by the developer is what will allow the developer to meet the intent of the Mobility Plan, not by actually meeting the requirements of that plan. This is not acceptable.

Response to Comment No. 84-3

Refer to Response to Comment No. 84-2. The waiver of dedication is also analyzed where appropriate in the Draft EIR. Refer to the discussion of the Project's consistency with Policy 2.17, Street Widening, within Table IV.K-1 on page IV.K-50 of Section IV.K, Transportation, of the Draft EIR. As discussed therein, the Project would be consistent with the intent of the Mobility Plan with approval of the requested waiver.

Comment Letter No. 85

Kanyne Boese
905 N. Genesse [sic] Ave.
West Hollywood, CA 90046-7319

Comment No. 85-1

I've been in the area for 2005 and for a city that already has a major lack of parking space, I am having a lot of trouble comprehending where these extra 5,000+ parking spots will be for the proposed Television City site. The EIR says the spots may be offsite. Does that mean offsite parking spots will be in my neighborhood? I don't understand why the location of these spots are not disclosed. Are they going to be parking garages or parking lots? Is this going to mean I won't be able to park in my own neighborhood or will be an obstacle getting places?

Response to Comment No. 85-1

Project parking is located in three primary locations in the Conceptual Site Plan: an above-grade parking garage in the southeast corner of the Project Site adjacent to the parking structure serving The Grove shopping center, surface parking, and underground parking structures in the west, north and southeast portions of the Project Site. Project parking is shown in the architectural plans that are available on the Department of City Planning website.

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply.

Comment No. 85-2

My community is full of families, and I know they will not feel comfortable having speeding cars rushing to get to work. How will speeding issues of so many more cars commuting to the new development be handled? What about those commuters using side streets and neighborhood streets to get to the property to avoid the gridlock on the main streets? We already see that happening now, even without the proposed development.

Response to Comment No. 85-2

The issue of speeding cars on the arterial street system is not a CEQA issue, but a matter of law enforcement and roadway design. Nevertheless, development of an NTMP would include consideration of affected neighbors and create strategies to reduce both cut-through traffic and speeding inside the neighborhoods. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for additional information. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 85-3

I feel like this adds a ton of safety issues too concerning the impact on air quality and pedestrian safety. What will this surplus of cars do to LA's already damaged ozone? Thousands of additional cars on the road cannot be healthy or be acceptable in terms of traffic. Please address this in more detail before the plan is approved. The Television City project is failing to address potential environmental factors. Not only this, but it has failed to acknowledge that the increased congestion will pose health and safety concerns. The city is already extremely overcrowded, and traffic poses an everyday issue. When will the draft EIR be revised to address these concerns in more detail than was provided? The public can barely get through such a long and technical document, especially to be able to make sure we are being given real answers about the expected impacts to our neighborhood. When will you be holding community meetings to explain in layman terms what is being planned and what the consequences will be?

Response to Comment No. 85-3

The EIR comprehensively analyzed the Project's impacts in accordance with CEQA, based on the thresholds in Appendix G of the CEQA Guidelines. Thus, revisions and additional analysis are not required.

The Project's Transportation Assessment included as Appendix M.1 of the Draft EIR includes an analysis of traffic safety as part of its non-CEQA transportation analysis; refer to pages 141–150. Refer also to Topical Response No. 12, Safety and Congestion, concerning pedestrian safety.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

With respect to air quality, operational emissions were determined to be less than significant. Refer to Section IV.A, Air Quality, of the Draft EIR, pages IV.A-69 through IV.A-73.

With respect to public outreach, this Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeded the required 45-day Draft EIR public comment period. Following the publication of this Final EIR, a finalized draft of the Specific Plan and the Project's other requested entitlements will be considered during several public hearings and meetings before City decision-makers prior to any decision made on the Project. The public will have additional opportunities to comment on the Project at public hearings and meetings, including, but not limited to, City Planning Commission and City Council meetings, the dates of which will be provided to the public in accordance with the City's noticing requirements.

Comment No. 85-4

Parking garages and lots are the third most common location for violent crimes in the US. How is this supposed to make me feel knowing there will be multiple added within walking distance of my home? What measures are going to [sic] implemented to ensure the children of our community are safe?

Response to Comment No. 85-4

As discussed in detail on pages IV.J.2-12 and IV.J.2-13 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project would include a number of security features including security cameras and 24-hour security personnel. These security features would be used to monitor the on-site parking areas. In addition, these parking areas would not be open to the public and would only be accessible by first entering through a security gate. As such, the parking areas would not impact the safety of the community. Refer also to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 for a discussion of the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 85-5

What has the city done to assess the noise concerns?

Response to Comment No. 85-5

The Draft EIR, which was prepared by the Department of City Planning as lead agency, comprehensively analyzed the Project's potential noise impacts during

construction and operation based on conservative assumptions and substantial evidence in accordance with CEQA. A mitigation measure and a number of PDFs have been included as part of the Project to address noise. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR for a listing of the mitigation measures and PDFs.

Comment No. 85-6

Was the nearly 2 million square feet of space not enough for this project since now there is a need for offsite parking? These parking garages and spots are likely to tarnish and possibly even take over spots that make LA a community.

Response to Comment No. 85-6

As discussed throughout the Draft EIR, the Specific Plan would permit a maximum of approximately 1,874,000 square feet of floor area.

Refer to Response to Comment No. 85-1, above, and Section B, Off-Site Parking, of Topical Response No. 13, Parking. As discussed therein, no off-site parking is proposed.

This comment discusses non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 85-7

This is known as a historic district, but our neighborhood will not be nearly as desirable when havoc takes over. What did your studies show about the effects on property values? What about the impacts on rents? And on home prices? How can you put a price on the impacts to the historic district?

Response to Comment No. 85-7

Potential impacts to historical resources located in the vicinity of the Project Site, including the Beverly Fairfax Historic District, were considered and analyzed in the Draft EIR. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10.

Regarding property values, rents, and home prices, these comments do not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comment is noted

for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 86

Robert Bonner
8318 W. Fourth St.
Los Angeles, CA 90048-4203

Comment No. 86-1

I am writing to comment on the CBS Television City expansion. As a 50 year resident of the neighborhood, I have seen a lot of change. This one is the largest and most serious to date.

Response to Comment No. 86-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 86-2

I would love to provide feedback on the project, but the draft EIR says the plan is still conceptual and the applicant would be given flexibility. My understanding is this is why the applicant is asking for a 20-year development agreement. I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

When will the detailed plan be provided? When will the community be allowed to give public input and weigh in on the actual design, not a plan that says things like the company "may make improvements" or could be two decades of construction?

How much further will the project progress before we are provided the detailed information we deserve?

Response to Comment No. 86-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, and 9-13 with regard to the accurate, stable, and finite Project Description that fully complies with CEQA and disclosed and analyzed all physical elements of the Project; how all plans in an EIR are inherently conceptual; how CEQA and City policy do not require a draft Specific Plan to be included in the EIR; the limited flexibility that would be permitted under the proposed land use exchange, consistent with adopted studio specific plans and other specific plans; and the

regulatory process under the proposed Specific Plan. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Refer to Response to Comment Nos. 28-13 and 32-3. As discussed therein, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 87

Joey Bothwell
313 N. Ogden Dr.
Los Angeles, CA 0036-2130

Comment No. 87-1

The conceptual plan shows dozens of big 18 wheeler trucks on the site, hauling dirt out and materials in, week after week, for years. Have the impacts of the trucks been fully analyzed? Does the Air Quality analysis show that there could be as many as 200 production trucks spewing diesel particulates in the community for years to come? If so, how could the city have approved such an impact on our community?

Response to Comment No. 87-1

Tables IV.A-6 and IV.A-8 in Section IV.A, Air Quality, of the Draft EIR present, respectively, the unmitigated and mitigated regional criteria air pollutant emissions associated with construction activity, including construction truck trips and any associated vehicle idling. As shown on page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the excavation/foundation construction phase would include approximately 640 daily truck trips over 185 working days. Refer to Topical Response No. 14, Construction Vehicle Impacts.

Refer to Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline.

Contrary to what is stated in this comment, the air quality analysis does not show as many as 200 production trucks per day during operation of the Project. Please refer to Response to Comment No. 26-E.1-16 regarding the number of Project-related operational trucks accessing the Project Site per day. As discussed therein, the truck trips during Project operation (approximately 31 total net new diesel trucks) are substantially less than the 100 trucks criteria cited in the Draft EIR that would trigger the need for a mobile air toxics HRA (see page IV.A-72 of the Draft EIR). Thus, the Draft EIR correctly concluded that Project-related TAC emission impacts during operations would be less than significant and consequently not result in a potential health risk impact.

A discussion as to why the Project is being proposed notwithstanding significant and unavoidable impacts is presented in Section VI, Other CEQA Considerations, of the Draft EIR. Please note that the Project has not been approved. Following the publication of this Final EIR, the Project and EIR will be considered during several public hearings before City decision-makers prior to any approval.

Comment No. 87-2

I'm also really concerned about parking. Thousands of people will be coming to the community every day and it's clear that not enough parking will be available—the overflow will be into our streets. And beyond parking is the impact on our community—did the EIR study all of the traffic, noise and air pollution from the buses, shuttles and ride share cars?

Response to Comment No. 87-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nevertheless, Topical Response No. 13, Parking, has been prepared for informational purposes. Refer to Topical Response No. 13 and Response to Comment No. 78-3 for a detailed discussion of the adequacy of the on-site parking supply to meet the peak parking demands of the Project and prevent spillover parking.

With respect to traffic congestion, as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

With respect to traffic noise, refer to the analysis of off-site noise on pages IV.I-48 through IV.I-54 of Section IV.I, Noise, of the Draft EIR. As demonstrated therein, impacts would be less than significant. Refer to Response to Comment No. 35-129 regarding the less-than-significant noise impacts associated with operation of the Mobility Hub.

With respect to the effect of traffic on air quality, refer to page IV.A-71 of Section IV.A, Air Quality, of the Draft EIR. As demonstrated therein, impacts would be less than significant. However, as part of this Final EIR, the Mobility Hub was further evaluated within the Confirmatory Air Quality, GHG, and Energy Analyses included as Appendix FEIR-9. As shown in these confirmatory analyses, air quality impacts attributable to the Mobility Hub, which confirmed that impacts associated with the Mobility Hub were accounted for, and there is no changed conclusion or new significant impact as to those impact areas.

Comment Letter No. 88

Hope Bowhay
hope.bowhay@tvcityla.com

Comment No. 88-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 88-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 89

Julianne Braden
333 S. Citrus Ave.
Los Angeles, CA 90036-3035

Comment No. 89-1

Having moved in just one week ago, I was totally horrified to learn that my new neighborhood is about to have hundreds of large 18 wheeler trucks, spewing diesel emissions and thousands of cars all pouring in for the next 20 years. And further, that the plan allows for the excavation of 45 feet of dirt, which will release huge amounts of methane gases from the removal of more than 700,000 cubic yards of dirt.

Response to Comment No. 89-1

Refer to Response to Comment No. 9-24 regarding the Project timeline. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the impacts of Project construction and hauling. Topical Response No. 14 also includes a discussion of air quality impacts as a result of hauling, and as discussed therein, localized air quality impacts as a result of hauling activities would be less than significant with implementation of mitigation.

With regard to methane, as discussed on pages IV.F-50 through IV.F-54 in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project would implement Mitigation Measure HAZ-MM-2, which requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public. These measures would include monitoring devices for methane and benzene to alert workers of elevated gas concentrations, contingency procedures if elevated gas concentrations are detected, worker training to identify exposure symptoms and implement alarm response actions, and the minimization of soil and groundwater during excavations. Implementation of Mitigation Measure HAZ-MM-2 would ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater would be less than significant.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 89-2

Methane is super-dangerous, as you can see from this link about the 1985 methane explosion: <https://web.stanford.edu/~meehan/class/ce2942001/rosspaper.htm>:

“Late in the afternoon of March 24, 1985, methane gas that had been accumulating ignited in an auxiliary room of the Ross Dress-For-Less Department Store located on Third Street, in the Wilshire-Fairfax District of Los Angeles. The resulting explosion blew out the windows and partially collapsed the roof of the structure, reduced the store interior to a heap of twisted metal and resulted in injuries requiring hospital treatment of twenty-three people. Police closed off four blocks around an eerie scene of spouting gas flames that continued through the night.

In the following days, a drill rig brought to the site was used to test for possible gas accumulations in the alluvial soil beneath the store. A “pocket” of pressurized gas was encountered at a depth of 42 feet beneath the parking lot between the store building and Third Street. Gas was also encountered in several other borings at the site in smaller quantities and at lower pressures. Pressure gauges, control valves, and, on the hole where the high pressure pocket was encountered, a valved flare pipe, were installed. Following a brief period during which gas was flared and bled off into the air, the anomalous gas condition at the Ross Store site gradually declined to the normal gas concentrations characteristic of the local area. In 1989 another venting incident occurred, this time at several sites on the north side of Third Street. This second venting fortunately was detected in time, and did not ignite. In this case, water and silt were ejected from outdoor vents along with the gas, in addition to accumulation of dangerous levels of gas in several buildings. A blow-out crater several feet deep, from which dirt and small stones were ejected several feet into the air was formed during this episode which lasted about 24 hours.

The setting of the accident—an old-world Levantine market place a few miles from Hollywood; the famed tarry graveyard of the sabre-toothed tigers; pillars of fire dancing in the darkened streets—these biblical images attracted attention of the press, the bar, and local politicians. And yet, three months later when a hastily convened panel of experts announced that the event was caused by digestive rumblings of an ancient and invisible swamp the whole thing had been mostly forgotten, the explanation accepted as yet another production of Los Angeles’ quirky environment.

Outside of a lawsuit that was settled quietly in 1990, the possibility that the accident was caused by the knowing agency of Los Angeles’ lesser known industry or that the official report of the experts, rather than being a serious statement of the scientific community, was a heavily edited script with a happily blameless ending, was not made known to the public, as we shall proceed to do here.”

Can methane build up and risk an explosion in my neighborhood like that Ross did?

Response to Comment No. 89-2

Refer to Response to Comment No. 13-6 regarding methane and methane explosions.

Comment Letter No. 90

Aaron Braun
364 S. Citrus Ave.
Los Angeles, CA 90036-3036

Comment No. 90-1

As I read the draft EIR for the TVC 2050 project, the people who are building this monstrosity are trying to convince us traffic will not be all that bad if the project is approved. Who are they kidding?

Response to Comment No. 90-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

This comment is nevertheless noted for the record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 90-2

They claim that large numbers of people will start using mass transit in the Beverly-Fairfax area, both tourists and residents alike, rather than deal with the traffic headaches caused by decades of high-rise construction and the arrival and departure of production trailers. I have no idea how they arrived at their numbers for transit users, but I can guess they have very little understanding of Angelenos and their love of cars. Can you please explain how it was determined that a large number of people will start using mass transit? Do you know the average number of people that are expected to switch to mass transit? How were these numbers determined? How will these numbers be adjusted when studies are done of the actual transportation used of people working and visiting there? How will the impacts that are being stated as not significant be re-analyzed for actual transit use, not some projections? If the project is approved based on these kinds of assumptions, then how can we go back once it's shown that the transit use numbers are just not happening? What happens then?

Response to Comment No. 90-2

Refer to Sections A, TDM Effects on Trip Generation, and B, Transit and TDM Effectiveness, of Topical Response No. 11, Transportation Demand Management, for a discussion of the 15-percent trip adjustment and the success of transit and TDM programs in similar studio and entertainment campuses. As discussed therein, there are several examples of major studio and entertainment campuses that have successfully implemented TDM programs for employees and visitors that have far exceeded the 15-percent trip adjustment estimated in the Draft EIR and even exceeded the estimated 20- to 30-percent reductions from the TDM Program.

Any updates to the TDM Ordinance of the City of Los Angeles will require a monitoring program to measure the continuing effectiveness of the Project's TDM Program. If the TDM Program is not meeting its goals, additional TDM strategies will have to be implemented until the Project meets the effectiveness levels discussed in the Draft EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 90-3

All of these construction trucks and production trucks and the re-routed commuter traffic is going to be in very close proximity to residential properties and apartments. I fear an increase in traffic accidents, injuries and worse. Where are the estimates of the increase in accidents, injuries and deaths resulting from all of the additional cars and trucks? You know that Beverly and Fairfax are two of the highest injury streets, right? How can this huge development be considered in that situation, for that location? How do you plan to mitigate traffic accidents or injuries? Who will be responsible for these accidents?

Response to Comment No. 90-3

Pages 141–150 of the Project's Transportation Assessment included as Appendix M.1 of the Draft EIR present an analysis of Project safety as part of its non-CEQA transportation analysis.

The Draft EIR and the Transportation Assessment acknowledge that the Beverly and the Fairfax corridors are on the City's High Injury Network. The Project's Transportation Improvement Program includes vehicular and pedestrian improvements to address the City's Vision Zero traffic safety programs; refer to Topical Response No. 15, Transportation Improvement Program. Refer to Topical Response No. 12, Safety and Congestion, regarding measures that have been included in the Project's transportation

improvement program in the form of TDM strategies and traffic signal and operational improvements along the High Injury Network corridors that would advance the traffic safety goals of the City's Vision Zero Program and would include LOS benefits.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 90-4

Please pump the brakes on TVC 2050 and ask the developer to provide a lot more detail to their plans. Neighborhood residents deserve details.

Response to Comment No. 90-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 90-2 and 90-3.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR has been prepared in full compliance with CEQA and fulfils CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the potential environmental impacts of the Project. Refer to Response to Comment No. 32-3 regarding the noticing of the Project in accordance with CEQA.

Comment Letter No. 91

Schneur Braunstein
Touch of Kindness, Inc.
345 N. La Brea Ave., Ste. 208
Los Angeles, CA 90036-2539

Comment No. 91-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

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TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 91-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 92

Patricia Breen
118 N. La Jolla Ave.
Los Angeles, CA 90048-3528

Comment No. 92-1

Traffic is already impossible in our community and will get much worse with all the construction.

Response to Comment No. 92-1

This comment provides a general statement about the condition of traffic in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The CTMP governing construction of the Project is aimed at addressing the concerns regarding safety during construction. Refer to Topical Response No. 12, Safety and Congestion.

Comment No. 92-2

And the number of parking spaces make no sense! The [sic] Draft EIR states there will be almost 8,000 employees on the site. I understand that anywhere between 3,000 to 5,000 people every day to the site to as audience members.

The project will have 5,300 parking spaces—only a fraction what will clearly be needed.

How will this work? Where will the overflow park?

Response to Comment No. 92-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, and Response to Comment No. 78-3 for a detailed discussion of the adequacy of the on-site parking supply to meet the peak parking demands of the Project and prevent spillover parking.

The comment regarding the number of audience members per day is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding the number of audience members and audience trips under existing and future Project conditions.

Comment No. 92-3

This project will have a terrible impact on our daily lives. I am not opposed to the development but want to ensure that the community [sic] needs are researched and addressed.

Response to Comment No. 92-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 92-1 and 92-2.

Comment Letter No. 93

Erik Breiter
5917 Amondo Cir.
Simi Valley, CA 93063-3601

Comment No. 93-1

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Response to Comment No. 93-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 94

Tracie Breiter
5917 Amondo Cir.
Simi Valley, CA 93063-3601

Comment No. 94-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

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Response to Comment No. 94-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 95

Malkee Breitman
512 N. Fuller Ave.
Los Angeles, CA 90036-1941

Comment No. 95-1

I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I'm devastated as a resident of 39 years, [sic] My husband Jeff and I continue to learn about the details (although not many have been provided to the public) about this development right in our neighborhood.

Response to Comment No. 95-1

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 95-2

We have so many questions as neighbors: How do you expect all these new employees to get to work? Where do they park? How am I, as a neighbor, supposed to navigate this new congestion on the streets? How will this affect our walkability, safety and parking? Do any of you all live this area? Are you not concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Response to Comment No. 95-2

The Draft EIR and the Transportation Assessment (included in Appendix M.1 of the Draft EIR) detail the trip generation of the Project's employees and visitors; also refer to Topical Response No. 10, Trip Generation. While the Transportation Assessment only takes into account 15 percent of the employees getting to/from work via a mode other than the automobile, the TDM Program for the Project has been designed to reduce the single-occupant vehicle by approximately 20 to 30 percent.

Under SB 743, traffic congestion and the adequacy of a new development's parking are not CEQA considerations. A project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer

applicable for the purposes of identifying a project's CEQA transportation-related impacts. As discussed on pages IV.K-72 through IV.K-78 of the Draft EIR, impacts related to VMT would be less than significant. Notwithstanding, upon the Project's anticipated completion in 2026, several intersections on arterial streets would operate at LOS E or F, before and after the addition of Project trips. The Project would not cause any location to change from LOS D or better to LOS E or F during morning or afternoon peak hours. The transportation analysis in the Draft EIR is based on a conservative (i.e., high) estimate of Project trips. The Project is implementing a TDM program intended to reduce the drive-alone automobile trips in favor of transit and carpool trips with the goal of decreasing the Project's traffic impact. A shuttle bus link between the Project Site and the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction could remove as many as 1,500 auto trips per day from the area roadways. A similar reduction in auto trips could be achieved through incentives to form and operate carpools among Project employees.

With regard to parking, as discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces based on parking ratios set forth in the Specific Plan. Vehicles may be parked in tandem or by valet, depending on the specific parking layout. In addition, the Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. With the parking supply on the Project Site sufficient to accommodate the peak parking demands of the Project, spillover parking into the neighborhoods is not anticipated. Off-site parking is not needed to meet the Project's peak parking demands, and the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Pedestrian and safety hazards are discussed in Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3. In addition, the Project intends to improve sidewalks and the landscape parkways along its west and north boundaries to improve the pedestrian environment.

The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 95-3

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information

needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Response to Comment No. 95-3

The Draft EIR was completed in accordance with the requirements of CEQA. Under CEQA, EIRs are informational documents intended to inform the public and decision-makers about the potential environmental impacts of a project. The Draft EIR disclosed all of the elements of the Project required by CEQA and comprehensively analyzed all potential environmental impacts associated with the Project.

Comment No. 95-4

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I pray and hope that you do the same with this development. We need more leaders fighting for a better future, not just fighting for a big check.

Response to Comment No. 95-4

Refer to Response to Comment 32-3 for a discussion of public hearings and opportunities for the public to voice their opinions on the Project. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 96

Khalam Bridger
561 N. Orlando Ave., Apt. 7
Los Angeles, CA 90048-2534

Comment No. 96-1

As a long-time resident of the Beverly Fairfax community, I am writing to you today with great concern and many questions. Specifically, I feel led to give my thoughts on Television City's Draft Environmental Impact Report. This DEIR has left the community with more questions than answers.

Response to Comment No. 96-1

The introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 96-2 through 96-5.

Comment No. 96-2

Personally, I am primarily concerned about the potential conflicts caused by this project in relation to the city's Mobility Plan, the Wilshire Community Plan, and the Plan for a Healthy Los Angeles.

I understand that the proposed project is only required to not conflict with the plans I have mentioned above. I, however, believe that the project not being found to conflict with these plans does not mean the project is right for the community. As a result, I have several questions for the city and the developer:

Response to Comment No. 96-2

The comments regarding whether the Project is right for the community do not raise environmental issues specific to CEQA or the Draft EIR and the environmental impacts addressed therein. No decision has been made for the Project. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 96-3

- Can you please outline how this plan will not conflict with the city's Mobility Plan? Specifically, how will the increased construction not compromise the plan's

promise to ensure the mobility safety of Angelenos? What about once construction is complete—during the many active uses of this development? Please give details.

Response to Comment No. 96-3

Refer to Response to Comment No. 26-165 regarding the Project's consistency with the Mobility Plan. Pages IV.K-46 through IV.K-57 in Section IV.K, Transportation, of the Draft EIR include a thorough analysis of the Project's potential to conflict with the Mobility Plan. As discussed therein, the Mobility Plan has many different goals and objectives as part of the Plan. The Project planning begins with taking its primary access off the adjacent arterial and collector streets and designing its entrances so that inbound traffic will not backup onto the adjacent public streets, consistent with the Mobility Plan.

Construction of the Project would include safety features as part of the CTMP described in Section IV.K, Transportation, of the Draft EIR and Topical Response No. 14, Construction Vehicle Impacts. These include a detailed haul route plan approved by LADOT, an ingress/egress plan for trucks depending on the construction phase of the Project (also to be approved by LADOT), notification of upcoming construction activity to nearby residents and businesses, a designated construction manager to field concerns from neighbors, sidewalk protective barriers, and field traffic managers to control construction vehicles to minimize impacts on adjacent street vehicles and pedestrian flow.

Table 18 on pages 162 and 163 of the Transportation Assessment (Appendix M.1 of the Draft EIR) summarizes the operating conditions of the roadway system in the area under Future Base Conditions both with and without the Project vehicles. The addition of Project vehicles does not cause any of the 31 study intersections currently operating at LOS D or better to degrade to LOS E or F.

Comment No. 96-4

- Can you please also outline how this plan will not conflict with the city's Plan for a Healthy Los Angeles? What effects will the continued construction and operational traffic have on the physical health of Beverly Fairfax residents and the environmental health of the neighborhood? Please give details and cite relevant data. What assumptions were made in determining the findings?

Response to Comment No. 96-4

Project construction would not be continuous. Refer to Response to Comment No. 9-24 regarding the Project timeline.

With respect to operational traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 100-3 and 114-3.

With respect to air quality, as discussed on page IV.A-20 in Section IV.A, Air Quality, of the Draft EIR, the City's Plan for a Healthy Los Angeles, adopted in 2015 and updated in 2021, includes various implementation programs to achieve the plan's health objectives. Among the listed implementation programs, the use of cool roofing where feasible and the following of the plan's Healthy Building Design Guidelines are the most applicable programs to the Project. Each of these measures is covered by Project Design Feature GHG-PDF-1, which requires the Project to meet LEED Gold v4 or equivalent standards, encompassing the applicable environment-related recommendations of the Healthy Building Design Guidelines and including cool roofing requirements. Thus, the Project will not conflict with the Plan for a Healthy Los Angeles.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project. A comprehensive description of sources and assumptions included in the HRA is provided in the Health Risk Assessment Protocol included in Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased truck trips associated with future operations, would be below SCAQMD's risk thresholds, further affirming the statements on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Comment No. 96-5

- What about the Wilshire Community Plan? In the plan's "Issues" section, the first thing listed is "avoiding encroachment from other uses, commercial off-street parking, and 'spillover' traffic from adjacent development." Can you please explain specifically how Television City, its construction, and its operations would not directly conflict with all these issues? What loopholes exist that allow for such a clear conflict to exist? Please be specific in your answer.

Response to Comment No. 96-5

An analysis of the Project's potential to conflict with the Wilshire Community Plan is provided on pages IV.H-43 through IV.H-44 in Section IV.H, Land Use and Planning, and in

pages 17 through 25 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR.

There is no encroachment associated with the Project and all development would occur within the boundaries of the Project Site.

As discussed on pages IV.K-36 to IV.K-37 in Section IV.K, Transportation, of the Draft EIR, the Project would include a CTMP (Project Design Feature TR-PDF-1), which will formalize how Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. As stated therein, a detailed CTMP, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction trips. Project Design Feature TR-PDF-1 explicitly prohibits construction worker or equipment parking on adjacent streets or in predominantly residentially zoned areas. In addition, the two off-site construction staging areas have been eliminated, (i.e., all construction staging would occur on-site) and no off-site parking is proposed; refer to Figure 1 of Appendix FEIR-8, Details of Buildout and Construction of the Final EIR. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for a discussion of the proposed NTMP. In addition, refer to Topical Response No. 12, Safety and Congestion, regarding traffic and to Topical Response No. 13, Parking, with regard to the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

There are no “loopholes” as suggested by the commenter and the Draft EIR was prepared in accordance with the CEQA Guidelines and City policy.

Comment No. 96-6

These plans are designed to protect the integrity of our neighborhoods, the health of Angelenos, and the mobility of our city. I fear that Television City would compromise the hard work put into these plans. As of now, I do not support this project. I hope the city and the developer will take the time to answer my above questions with the same thoughtfulness I put into them.

Response to Comment No. 96-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 96-2 through 96-5.

Comment Letter No. 97

Aron Bross
167 N. Detroit St.
Los Angeles, CA 90036-2915

Comment No. 97-1

I am concerned that the project description for the proposed TVC project does not describe what will end up being built. It presents a set of almost an unlimited number of development options.

Response to Comment No. 97-1

Section II, Project Description, includes a detailed description of the Project, and the Draft EIR disclosed all elements of the Project required by CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR analyzed the proposed development program described in Section II, Project Description, of the Draft EIR (refer to pages II-12 through II-35 of the Draft EIR and specifically Table II-2, Proposed Development Program). Future Project changes that are substantially different than the proposed Project or are beyond the scope of impacts evaluated in the EIR would require additional City review and approval, as well as CEQA compliance review.

Comment No. 97-2

What is actually going to be built? What parts of the plan are considered conceptual? How can a project be considered for approval when the area that will be most affected cannot be told exactly what is going to be put on the site?

It seems like the developer is trying to preserve every option. But the community has no idea of what will actually be built and has no way to evaluate the impacts of the project. Why does the developer get to have flexibility for along the way? How does that make sense when, from what I can tell, this is going to be an enormous complex with many different uses? So why can't the developer tell the community exactly what will be built?

Response to Comment No. 97-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and Conceptual Site Plan; the level of detail required in an EIR for a specific plan project; how Section II, Project Description, of the Draft EIR complies with

CEQA and includes sufficient information to evaluate the environmental impacts of the Project; and the required discretionary process (which includes subsequent CEQA compliance review) for future Project changes that are substantially different than the Project that was analyzed in the EIR. Refer to Topical Response No. 3, Permitted On-Site Uses, with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed in Topical Response No. 1, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 97-3

With so many different uses referenced as options in the plan, I don't have a clear understanding of the impact of those uses on traffic. Did you study the impact of the warehouses, facilities, theaters, offices, conferences, etc.? Were all the uses closely examined? Including for when they would end up being built? The first things built, it would seem, would have a longer period of time for any impacts to be experienced, correct?

A use, such as a warehouse or conference, could bring a lot of traffic to the area. I do not want this level of traffic in my community. Will you restrict the uses in this project? Are you going to allow events of all sizes? If you do restrict the uses, how will you implement and enforce those restrictions? How can you ensure the developer abides by the restrictions you put in place?

Response to Comment No. 97-3

The Project is the continuation and expansion of an existing studio use. As discussed in Topical Response No. 3, Permitted On-Site Uses, in response to comments on the Draft EIR, the list of permitted uses was refined to correspond with the proposed uses outlined in the Preliminary Draft Specific Plan (i.e., sound stage, production support, production office, general office, and retail) and the ancillary sitewide uses that support the studio and the five permitted land uses. These uses are consistent with the studio use of the Project Site and are fully accounted for in the transportation analysis in the Draft EIR.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Nevertheless, the Transportation Assessment (Appendix M.1 of the Draft EIR) investigated the peak activity of the land uses that would have the greatest

transportation impact, so a combination of land uses with lesser impacts would already be covered by the Draft EIR analysis. For example, the proposed development program includes up to 20,000 square feet of retail use. The Transportation Assessment conservatively assumed that the retail space would all be occupied by restaurant uses which generate a higher amount of trips.

As stated above, uses that fit within and are consistent with the five permitted studio land uses are accounted for in the EIR's analyses. Refer to Response to Comment Nos. 26-14 and 28-6 regarding the uses discussed in this comment. The trip generation of the production support spaces and other permitted uses have been included in the analysis.

Trip generation and parking demand from special events related to onsite production activities (crew parties, small movie screenings, neighborhood meetings, etc.) are already included in the trip generation estimates used in the Transportation Assessment. Refer to Topical Response No. 10, Trip Generation, regarding how large special events (not related to the studio) would not be regulated by the Project's Specific Plan and would continue to be regulated on a case-by-case basis by City departments consistent with existing conditions.

Comment No. 97-4

Please provide a clear development program so we can understand the project and its impacts. I appreciate the transparency.

Response to Comment No. 97-4

Refer to Response to Comment No. 97-1.

Comment Letter No. 98

Andrea Bucci

Comment No. 98-1

It's nice to see a project that not only creates jobs and benefits the economy, but also moves Los Angeles into a less vehicle-centric city. Traffic congestion is nearly every Angeleno's chief complaint. And with each new development project, we hear about how increased traffic will be handled.

TVC 2050 has gone the extra mile in addressing this issue. In addition to the impressive mobility hub for buses, shuttles, rideshares, scooters and bikes, the Television City campus will be utilizing all its property edges for ingress and egress. This will get visitors and production vehicles off streets and onto the studio lot in an efficient manner.

Physical improvements focus on key commercial corridors including Fairfax Avenue, Beverly Boulevard and The Grove Drive. Left-turn signal phases will be installed at key 3rd Street intersections. Six new driveways will facilitate traffic flow and the enhanced design and function of the main gate will facilitate efficient queuing on site.

I whole-heartedly support this project and I look forward to seeing the improvements in the neighborhood.

Response to Comment No. 98-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 99

Fradel Bukiat
343 N. Formosa Ave.
Los Angeles, CA 90036-2526

Comment No. 99-1

As a 40 year resident, I am very upset about the CBS expansion.

Response to Comment No. 99-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 99-2

There are numerous primary streets and intersections impacted. Do you know the exact number of primary streets and intersections that will be impacted by the project? What are those streets? What community members will be the most impacted on these streets?

Response to Comment No. 99-2

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (included in Appendix M.1 of the Draft EIR). Figure 21 on page 77 of the Transportation Assessment shows the assignment of Project trips through the street system serving the Project Site. Table 18 on page 162 of the Transportation Assessment shows the effect of the Project trips on the 31 study intersections in terms of changes in the LOS of each intersection.

Comment No. 99-3

What was the process for getting input from these community members in deciding where a project like this would be located?

Response to Comment No. 99-3

CEQA does not require public consultation regarding the choice of a Project Site. However, as discussed in Section V, Alternatives, of the Draft EIR, an alternative site was considered but rejected. Refer to Topical Response No. 16, Project Alternatives Analysis. The objectives of the proposed Project are closely tied to the need to improve existing

operations on the currently underutilized Project Site by creating a cohesive and integrated studio campus environment with new technologically advanced facilities. An alternative site would not meet these objectives. Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 99-4

How can the DEIR not acknowledge any details or review potential impacts? There are definitely significant impacts. Why does the development try to claim that the only significant impacts will be during construction? Do you plan to acknowledge and release these details?

Response to Comment No. 99-4

This comment incorrectly claims that the Draft EIR did not acknowledge any details or review potential impacts. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the Project elements required by CEQA, and all potential impacts are comprehensively analyzed throughout the Draft EIR in accordance with CEQA. The Project's impacts are summarized in Section I, Executive Summary, and in Section VI, Other CEQA Considerations, of the Draft EIR.

Comment No. 99-5

LADOT has spent \$50.6 million so far this year for Vision Zero projects, and we shouldn't allow plans that are only in concept to threaten the future of safe roads. How will this project affect that program in the Beverly Fairfax neighborhood? What will the spending be for the rest of the year? What will the spending be for the following year? What specifically will the impact be on our Vision Zero goals?

Thank you for your time.

Response to Comment No. 99-5

The comment does not provide any substantial evidence of how the Project would negatively affect Vision Zero spending or conflict with the program's implementation. Topical Response No. 15, Transportation Improvement Program, details the traffic safety spending anticipated by the Project as a requirement of its development.

Comment Letter No. 100

Kathryn Bundy
katbuns@gmail.com

Comment No. 100-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 100-1

Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR. Refer to Response to Comment No. 32-3 regarding the 60-day public comment period, which exceeds the typical 45-day period required under CEQA.

The Draft EIR was prepared in accordance with CEQA, adequately analyzes potential impacts, and includes all feasible mitigation for all identified impacts.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 100-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 100-2

Refer to Response to Comment No. 11-3 regarding the scope of the Project. Potential impacts to infrastructure and public services were thoroughly analyzed in the Draft EIR. Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR addressed impacts with respect to fire protection and police protection, respectively. The analysis contained in these sections concluded that the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain

acceptable service ratios, response times, or other performance objectives related to fire and police protection. Therefore, impacts with respect to fire and police protection were determined to be less than significant. With regard to the adequacy of LAFD fire and LAPD police protection services and infrastructure, refer to Response to Comment Nos. 16-5 and 16-10. With regard to potential impacts to parks, refer to Response to Comment No. 35-135. With regard to potential impacts to schools, refer to Response to Comment No. 600-2.

An analysis of Project impacts with respect to utilities and infrastructure is provided in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, Section IV.M.2, Utilities and Service Systems—Wastewater, and Section IV.M.3 Utilities—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR, as well as in pages 70–72 of the Initial Study (included as Appendix A of the Draft EIR). This analysis concluded that the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and therefore, impacts were determined to be less than significant.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 100-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 100-3

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Regarding cut-through traffic, refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Response to Comment No. 9-24 regarding the buildout timeline t.

Comment No. 100-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 100-4

Refer to Response to Comment No. 32-7 regarding the provision of housing and the consideration of economic and social effects under CEQA.

Comment No. 100-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 100-5

The Project is not anticipated to result in significant soil destabilization. Refer to Response to Comment Nos. 11-25 and 26-69 with regard to this topic.

Comment No. 100-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 100-6

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation for the Project Site.

Refer to Response to Comment Nos. 11-3 and 9-16 regarding the Project’s size and scale.

Regarding the construction timeline, refer to Response to Comment No. 9-24.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Refer also to Topical Response No. 8, Vehicle Miles Traveled, and Topical Response No. 14, Construction Vehicle Impacts.

Refer to Response to Comment No. 11-5 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts. As discussed therein, temporary dewatering activities are anticipated during construction. Due to the temporary nature of dewatering and the compliance with all applicable regulatory requirements, impacts with respect to dewatering and subsidence would be less than significant. Also refer to the Dewatering Report in Appendix FEIR-13 of this Final EIR, which confirms the less-than-significant impact conclusion in the Draft EIR.

The Draft EIR comprehensively analyzed the Project's potential air quality impacts during construction in accordance with CEQA. Refer to Section IV.A, Air Quality, and Appendix B of the Draft EIR. Refer also to the quantitative HRA included as Appendix FEIR-10 of this Final EIR, which was prepared in response to comments on the Draft EIR and confirms the Draft EIR's conclusion that potential health risk impacts would be less than significant.

Comment No. 100-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a "conceptual" site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site "a regional center" that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 100-7

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-16, which discuss how the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project; all plans in an EIR are inherently conceptual; the purpose of a specific plan and the limited flexibility that would be permitted under the

proposed land use exchange, consistent with adopted studio specific plans and other specific plans; and the regulatory process under the proposed Specific Plan.

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The EIR comprehensively analyzed the Project's impacts in accordance with CEQA, and additional environmental review is not required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 101

Ashley Burgess
234 S. Figueroa St.
Los Angeles, CA 90012-2541

Comment No. 101-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 101-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 102

Andrea C.
349 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 102-1

The safety impacts of the Television City project will be tremendous and I feel the EIR does not adequately address all of them and how they will be mitigated.

Response to Comment No. 102-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 102-2 through 102-7.

The comment generally references safety impacts but does not specify a CEQA impact being referred to. Safety associated with CEQA impacts is analyzed throughout relevant sections of the Draft EIR, including Section IV.F, Hazards and Hazardous Materials; Section IV.H, Land Use and Planning; Section IV.K, Transportation; Section IV.J.1, Public Services—Fire Protection; and Section IV.J.2, Public Services—Police Protection, of the Draft EIR.

Comment No. 102-2

1. There will be special events held at the site. What limits have been determined for special events in terms of the number of people and does it depend on the kind of event? How often will these events be held, weekly, monthly? And what days of the week and hours will these special events be held? Will specific or different equipment be brought in and for what purpose? Are there any special events that will not be allowed there, if so what are those?

Response to Comment No. 102-2

Special events would not be regulated by the proposed Specific Plan, do not regularly occur on-site, and would be subject to existing City permitting regulations. Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 102-3

Where will guests attending these events be directed to park?

Response to Comment No. 102-3

All guests will have the ability to park at the Project Site. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 102-4

How has the additional noise from these events been analyzed and how will it impact not only those attending but the neighbors? The potential impacts of increased noise levels are often overlooked.

Response to Comment No. 102-4

Refer to Topical Response No. 3, Permitted On-Site Uses, Section C, Special Events, of Topical Response No. 10, Trip Generation, and Response to Comment No. 66-5 regarding special events.

Comment No. 102-5

2. I understand the construction will take 20 or more years. What are all of the different kinds of construction activity that will take place? And should we expect to be the different kinds of noise—jackhammering? blasting or explosions? What about the excavation/digging? Loading dump trucks and truck driving on site? I want to have a much clearer understanding of what all the sources and decibels of noise will be.

Response to Comment No. 102-5

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

A description of the types of equipment that could be used during the demolition, grading, excavation, grading, mat foundation, building construction, paving, and application of architectural coatings is summarized on pages IV.I-37 and IV.I-38 in Section IV.I, Noise, of the Draft EIR. A detailed list of the construction equipment and construction noise and vibration calculations are included in Appendix J of the Draft EIR. Table IV.I-9 of the Draft

EIR summarizes the potential noise levels from representative construction equipment that could be used.

Project Design Feature NOI-PDF-2 prohibits pile driving (refer to page IV.I-34 in Section IV.I, Noise, of the Draft EIR). Instead, pile installation for shoring and foundation would use drilling methods to minimize vibration impacts. Blasting and explosions would not occur.

Noise associated with excavation/grading and truck trips are analyzed in Section IV.I, Noise, of the Draft EIR. Refer to Table IV.I-10 of the Draft EIR for pre-mitigation construction noise levels including during the excavation and grading phase and Table IV.I-11 of the Draft EIR for construction truck noise levels. Refer to Response to Comment Nos. 26-136 and 35-120 regarding noise impacts associated with off-site truck trips. Projected noise levels during all phases of construction are provided in Section IV.I, Noise, of the Draft EIR. Refer to Table IV.I-10 of the Draft EIR for projected noise levels at each of the sensitive receptor locations prior to mitigation and Table IV.I-19 of the Draft EIR for noise levels with mitigation incorporated.

Comment No. 102-6

3. The signage is not described in enough detail. It seems billboards were mentioned but what about lighting of those and any other signs? Light pollution is a real thing. How will this lighting impact residents? How much energy will the signs use? What about any signage planned for on the property? Finally, the impact of visual distraction with numerous signs could be problematic.

Response to Comment No. 102-6

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR. Also refer to Response to Comment Nos. 26-129 and 213-2 regarding off-site signs and billboards, which would not be permitted under the Sign District.

The Project's electricity usage was estimated using SCAQMD's recommended CalEEMod 2020.4.0 software by inputting the floor area of the five proposed studio land uses and the electrical demand factors for each land use. To the extent that signage is used for these types of land uses, the CalEEMod default electrical demand factors addresses electricity for signage. In addition, electricity associated with signage was specifically analyzed in response to this comment on the Draft EIR and the calculations are provided in the Confirmatory Air Quality, GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR). This clarification does not change any of the impact conclusions in the Draft EIR. Overall, electricity usage associated with

signage would represent less than one percent of the total electricity usage from the Project.

With respect to light pollution, refer to Response to Comment No. 26-E.1-76. As discussed therein, pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts, including light and glare, shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.

Comment No. 102-7

4. Methane is prevalent in this area. What is the risk of methane build-up and possible explosions like the Ross in the 1980s? This is a particularly frightening safety hazard.

Response to Comment No. 102-7

As concluded in the Draft EIR, potential impacts related to subsurface gases and associated potential impacts to soil and groundwater would be less than significant. Refer to Response to Comment No. 13-6 with regard to risks associated with methane.

Comment No. 102-8

Another major concern is the portion of the EIR that states a goal for this Television City project is to make money for the developer. The city has no reason to state this. Why was that included? Is the city working for the developer or the people who live here?

Response to Comment No. 102-8

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective.

Comment Letter No. 103

Mamata C.
626 S. Orange Dr.
Los Angeles, CA 90036-2006

Comment No. 103-1

I am a resident of the Fairfax area, and I have a few concerns about the TVC proposal. I fear that my daily life is going to be impacted a great deal, and I want some clarification.

Response to Comment No. 103-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 103-2 through 103-5.

Comment No. 103-2

My first question has to do with all of the parking that is going to be required. It seems clear that there will not be enough parking on the property itself. Why else would the plan refer to off-site parking? So, what is considered off-site parking? Where would temporary off-site parking be? What streets do you plan on designating for off-site parking? Which neighborhoods are going to be designated as off-site parking areas? How many cars will be allowed in off-site parking areas? Will truck need to be parked in off-site parking areas? How many trucks are we talking about?

Response to Comment No. 103-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nonetheless, regarding parking, as discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces based on parking ratios set forth in the Specific Plan. Vehicles may be parked in tandem or by valet, depending on the specific parking layout. In addition, the Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 103-3

How are you going to make sure that our neighborhoods maintain the same level of safety if more cars are going through them to park? Do you have people to monitor these areas to make sure that children can still walk and play around our streets safely?

Response to Comment No. 103-3

This comment does not relate to the Draft EIR's analysis of the Project's potential environmental impacts. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding pedestrian safety. Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 for a discussion of the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security. Refer also to Topical Response No. 9, Neighborhood Traffic Management Plan, for a discussion of the NTMP which addresses off-site parking.

Comment No. 103-4

What were the findings about cars or trucks in off-site parking areas emitting exhaust, which will be dangerous to residents nearby? Have there been any studies you have conducted to make sure that air pollution as a result of off-site parking doesn't hurt residents? Please provide as much detail as you can with respect to the health of residents nearby off-site parking zones.

Response to Comment No. 103-4

Refer to Topical Response No. 13, Parking, for a discussion of the parking proposed for the Project, which will be fully accommodated on-site, the adequacy of the proposed on-site parking supply, and that the Project does not propose any off-site parking. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Additionally, as discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips associated with the Project would not approach the screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects.

Comment No. 103-5

I am also curious about who would be displaced by production and filming related activities, something mentioned in the plan, and why would they be? How many people do you think will be displaced? Over what timeframe do you think they will be displaced? Is the draft EIR referring to employees at the site being displaced? If this is the case, where would they be able to park? Would this flow into our neighborhoods? If so, how many cars will be parking in our neighborhoods? How do we ensure that we are able to park near our houses instead of far away?

Response to Comment No. 103-5

It is unclear what displacement the commenter is referencing. All proposed uses would be located within the Project Site and, as discussed on page 69 of the Initial Study included as Appendix A of the Draft EIR. No housing currently exists on the Project Site, and the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere.

Refer to Response to Comment No. 103-2, above, for a discussion of parking.

Comment No. 103-6

The Draft EIR does not go into nearly enough detail about any of the points made above. It would be unfair to the Fairfax community if we became one large parking site. We have a safe and peaceful area now. However, this will change if we become one large parking lot. I look forward to receiving your answers to the concerns and questions I have posed.

Response to Comment No. 103-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 103-2 through 103-5.

Comment Letter No. 104

Johnathan Cahill
4125 S. Figueroa St.
Los Angeles, CA 90037-2092

Comment No. 104-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 104-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 105

Christopher Callon
7947 W. Fourth St.
Los Angeles, CA 90048-4412

Comment No. 105-1

I am worried about the environmental impacts implicated in the TVC 2050 expansion.

Response to Comment No. 105-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 105-2 through 105-5.

Comment No. 105-2

The plan says that there could be 20 years of construction and hundreds of trucks on the site. Have you studied the impacts on air quality this will cause? Have you considered all the greenhouse emissions that will be caused by decades of construction?

Response to Comment No. 105-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 9-24 and 26-E.1-24 regarding the number of construction trucks and buildout timeline and analysis. The Draft EIR comprehensively analyzed the Project's construction impacts under the anticipated 32-month buildout schedule, as well as under a long-term buildout scenario.

Refer to pages IV.A-74 through IV.A-77 of Section IV.A, Air Quality, of the Draft EIR and to pages 25 through 76 and 128 through 227 of Appendix B of the Draft EIR regarding the analysis of Project impacts during long-term buildout for air quality.

Refer to pages IV.E-85 through IV.E-86 of Section IV.E, Greenhouse Gas Emissions, of the Draft EIR and to pages 310 through 324 of Appendix B of the Draft EIR regarding the analysis of Project GHG emissions during long-term buildout.

Comment No. 105-3

This project is set to be located right next to Pan Pacific Park. How will this impact the air quality of the park?

Response to Comment No. 105-3

As discussed in Response to Comment Nos. 26-26 and 26-28, the SCAQMD's LST methodology employed in the Draft EIR's air quality analysis defines sensitive receptors as a receptor, such as residence, hospital, convalescent facility, where it is possible that an individual could remain for 24 hours, and, thus, Pan Pacific Park is not considered a sensitive receptor. However, the methodology utilizes conservative assumptions and pollutant dispersion factors such that any receptor farther from the Project Site than an analyzed receptor would be expected to have lower impacts than the analyzed receptors. The Project LST analysis assumed the minimum distance under the LST methodology (25 meters) for the analysis of sensitive receptor impacts. As shown in Tables IV.A-10 and IV.A-11 of the Draft EIR, after the application of mitigation, localized air quality impacts would not exceed LST thresholds, and impacts would be less than significant. Since Pan Pacific Park is farther from the Project Site than the closest receptor analyzed, localized impacts to air quality in Pan Pacific Park, even if considered hypothetically as a sensitive receptor, would also be less than significant.

Comment No. 105-4

Furthermore, this project is proposing tons of excavation right next to the La Brea Tar Pits. Will this cause a health risk or impact air quality? Has this issue been looked into?

Response to Comment No. 105-4

Refer to Response to Comment Nos. 13-4, 16-64, and 26-80 regarding the tar collection system and the testing and disposal requirements for any impacted soil.

Comment No. 105-5

It seems like excavating right next to the tar pits would pollute groundwater and release tar and methane. Is the city going to do a ground water study to make sure our water won't be polluted?

Response to Comment No. 105-5

Refer to Response to Comment Nos. 13-4, 13-6, 16-64, and 26-80 regarding excavation as it relates to the tar pits, groundwater pollution, and the release of tar and

methane. The Draft EIR comprehensively analyzed impacts associated with excavation, and an additional groundwater study is not required by CEQA or the City.

Comment No. 105-6

I think it would be irresponsible to approve this project without addressing these issues. Please address the above comments and questions and consider the environmental impacts this project would have on our neighborhood.

Response to Comment No. 105-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 105-2 through 105-5.

Comment Letter No. 106

Reululd Campbell
636 N. Spaulding Ave.
Los Angeles, CA 90036-1869

Comment No. 106-1

I am writing to you today with my thoughts on the recently released Draft Environmental Report for the Television City Project. As a long-time Beverly Fairfax community member, I feel that I have a stake in the outcome of this project. As a result, I would like to express my concerns and ask questions about the DEIR. I hope that you all take the time to address each of my questions and concerns in detail.

Response to Comment No. 106-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 106-2 through 106-4.

Comment No. 106-2

As we all know, Beverly Fairfax is already a highly populated area. With 14 proposed stages, many of which will house audiences, thousands of additional people could be onsite each day! Has the public been given a solid number on how many people can be on-site? Will all of the stages be used at the same time? What happens when audience members and employees try to park for shows? From the [sic] it seems there will only be 5,300 parking spaces for potentially 13,300 people. Aren't those parking spaces for employees also? How exactly will that work? Can someone please outline this for me?

Response to Comment No. 106-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for information regarding audience visitors and trips. The stage areas could be used concurrently for various studio-related activities.

For informational purposes, Table II-33 on page II-1640 shows the effects of mode of arrival and time of day on the total parking demand generated based on the anticipated future parking and travel patterns with the Project.

The various groups of people traveling to the Project Site would include:

- **Employees**—Arrivals by car total approximately 75 percent of the employees, but not all of these employees are driving alone. This estimate assumes that, once the TDM Program is in effect with its carpool incentives, 20 percent of the employee vehicles would carry more than one person to the campus. Approximately 20 percent of the employees would take a mode other than the automobile to the Project Site. The Draft EIR Transportation Assessment analysis is based on a TDM Program that would see 15 percent of the Project trips arriving at and departing the Project Site via a mode other than driving alone to the Project Site. The Project Site's proximity to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction, the proposed shuttle bus connecting the subway station to the on-site Mobility Hub, and incentives for the formation and operation of employee carpools will all help support this goal. The Project's TDM Program is expected to exceed the 15% multimodal target.
- **Office Visitors**—The industry standard for office assumes that approximately 10 percent of the trips to/from an employment center are visitor trips.¹⁵¹ These are people coming to the office uses for meetings, salespeople, etc. Likewise, the sound stages and production offices would have visitors arriving at the Project Site associated with the production itself. Because these visitors would represent infrequent trips to the Project Site, it was assumed that 85 percent of them would arrive by automobile, consistent with LADOT estimates relative to the amount of transit available nearby. To be conservative, it was assumed that all visitors arriving via automobile would drive alone.
- **Audience Members**—As with existing conditions, audience shows would continue to occur on the Project Site on weekdays and on weekends. The busiest day would be a weekday that served all audience shows with daytime filming (i.e., the *Late Late Show*, *Real Time*, and *The Price is Right*). As discussed in Topical Response No. 10, the trip generation estimates for the Project Site took into account the propensity of audience members to travel together in groups of two or more people, with a relatively small percentage of them (10 percent) arriving by transit/walk-in/drop off.

¹⁵¹ National Parking Association and Urban Land Institute (ULI), Shared Parking, 3rd Edition, 2020, Shared Parking Model.

Table II-33
Weekday Peak Parking Demand by Population

Group	Peak Population ^a	Travel Mode		Daytime Parking Demand		Evening Parking Demand	
		Description	Percent	Percent of Peak	Demand	Percent of Peak	Demand
Employee	7,832	Drive Alone	55%	100%	4,308	20%	862
		Carpool Passenger	20%				
		Transit/Rideshare	17%				
		Bike/Walk	3%				
		Vacation/Sick	5%				
Office Visitor ^b	783	Drive Alone	85%	100%	666	10%	67
		Transit/Rideshare	15%				
Daytime Audience ^c	375	Driver	40%	100%	150	0%	0
		Passenger	50%				
		Transit/Rideshare	10%				
Evening Audience ^d	450	Driver	45%	0%	0	45%	91
		Passenger	45%				
		Transit/Rideshare	10%				
Retail/Restaurant Customer	200	Driver	70%	85%	119	100%	140
		Passenger	25%			0%	
		Transit/Rideshare	5%			0%	
Total					5,242		1,159

^a The maximum number of people that may be on-site at a given time in the identified category.

^b Assumes 10 percent of total employees.

^c Based on audience totals from Table II-4 from Topical Response No. 10, Trip Generation. Assumes simultaneous filming of Late Late Show, Real Time, and The Price is Right.

^d Based on audience totals from Table II-4 from Topical Response No. 10, Trip Generation. Assumes filming of Dancing with the Stars.

Source: Gibson Transportation Consulting, Inc., 2023.

- **Retail Customers**—These types of trips typically have high automobile occupancy levels as shopping and dining are social trips. The amount of retail on the Project Site would be small (20,000 square feet, which is slightly over 1 percent of the total permitted floor area), and many of the customers to the retail space are anticipated to be studio employees. The retail parking demand generated by customers outside of the Project Site is accounted for in the overall parking demand.

Table II-33 shows that the Project could be fully served by the proposed parking supply of approximately 5,300 spaces on a peak weekday. On a weekday evening, the parking demand would be approximately 1,160 spaces, or approximately one-quarter of the weekday daytime demand because of the substantial reduction in employee evening parking demand. Similarly, the weekend parking demand at the Project Site would be

dramatically lower than weekday demand because most of the studio and office space would be lightly used on weekends.

Comment No. 106-3

With more people comes more crime. What does the evaluation show about expected increases in crimes? What kinds of crimes in particular? What measures will be taken to ensure the safety of our children with more people being in the neighborhood? Additionally, more people means an increased opportunity for crimes in Beverly Fairfax at night, when it seems most of the shows will be taking place. What will be done to combat this increased crime rate? Will the city deploy more police officers to Beverly Fairfax on nights with shows? More cars speeding through our neighborhoods can be detrimental to their health and safety. Has an analysis on this been done? If so, what were the findings? If not, when and how will it be conducted?

Response to Comment No. 106-3

Regarding the comments about crime, refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

With regard to pedestrian safety, refer to Topical Response No. 12, Safety and Congestion.

With regard to cut-through trips, refer to Topical Response No. 9, Neighborhood Traffic Management Plan.

Comment No. 106-4

Additionally, we are fortunate to have multiple historic structures and an entire historic district in Beverly Fairfax. I don't think the DEIR did a good enough job of evaluating the impacts of a potentially extra hundred thousand people on our history. Will the project overwhelm the Adobe and Farmers Market? Please explain your claim in detail. I would like to see the study and hard data that backs up your claim. What about the historic district itself—what will happen to it if thousands of cars drive through it every single day? What about parking in the historic district, will there be any restrictions? Will people be allowed to park in the historic district?

Response to Comment No. 106-4

Potential impacts to historical resources located in the vicinity of the Project Site, including the Gilmore Adobe, The Original Farmers Market, and the Beverly Fairfax Historic District, were considered and analyzed in the Draft EIR. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13, 26-E.2-10, and 363-1 regarding how the Project would not result in significant impacts to the Gilmore Adobe, The Original Farmers Market, or the Beverly Fairfax Historic District. Section E of Topical Response No. 5 also discusses how vehicle trips from the Project would not significantly impact the Beverly Fairfax Historic District.

The comment about the number of people is incorrect. As discussed in Section IV.K, Transportation, of the Draft EIR, the Project would include a total of approximately 7,832 employees upon full buildout. As discussed in Topical Response No. 13, Parking, the Project would provide adequate on-site parking to ensure that there is no parking spillover in surrounding residential neighborhoods.

Comment No. 106-5

Again, I really hope you all take time to answer each of my questions in detail. I'm really concerned about the outcome of this project, and I feel like as a resident, I have the right to know how it will actually impact my life.

Response to Comment No. 106-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 106-2 through 106-4.

Comment Letter No. 107

Gialiamp Carmassi
342 1/2 N. Stanley Ave.
Los Angeles, CA 90036-2397

Comment No. 107-1

I live in the Beverly Fairfax neighborhood, and I am deeply concerned about the TVC 2050 project. There are a few concerns and question I have, and I'm listing them below.

Response to Comment No. 107-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 107-2 through 107-4.

Comment No. 107-2

- I'm unclear about the routes for vehicles hauling materials to and from the sites. It looks like the routes are still undetermined. Why aren't these routes included in the draft EIR? When will these routes be established and communicated with community members? I'm sure residents of this community would be upset to learn that the truck routes are through their neighborhood. I can't even imagine dirt and debris being hauled near my home. What happens if routes are established and then truck drivers don't stick to them? Will the routes be enforced, and how? Will there be certain routes that trucks will be completely prohibited from driving on? Which are those? What about restrictions about driving on any neighborhoods streets?

Response to Comment No. 107-2

The three haul routes are disclosed in various sections of the Draft EIR, including Section II, Project Description, of the Draft EIR (pages II-34 to II-35). The proposed haul routes are further explained in Topical Response No. 14, Construction Vehicle Impacts. These proposed haul routes have been reviewed tentatively and approved by LADOT (see the LADOT Haul Route Approval Letter included in Appendix M.5 of the Draft EIR), and all haul trucks would be granted a permit that only allows travel on these roadways. Final approval of the proposed haul routes would require additional departmental approvals, including LADOT, the Bureau of Street Services, and the Department of City Planning.

Trucks would not be allowed on residential streets. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD. A construction manager would be appointed by the Project and his/her phone number would be advertised on the Project website and communicated to the neighbors so that trucks on the local streets could be reported to the construction manager, who, in turn, could call for targeted enforcement.

Additionally, the Project would include a CTMP pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 and IV.K-37 of the Draft EIR), which would include provisions to limit the amount of construction-related trips during peak hours to the extent feasible, as well as a prohibition of construction worker or equipment parking offsite. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the CTMP.

Comment No. 107-3

- The TVC 2050 project seems very similar to the Millennium project in Hollywood. That project is a disaster, and there never seemed to be a clear plan throughout the entire planning process. I thought city officials would have learned their lesson with the Millennium project. Have there been comparisons made between the Millennium project and TVC 2050? Did city officials use studies from the Millennium project to draft the EIR for TVC 2050?

Response to Comment No. 107-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13. As discussed therein, the *Millennium* case is not applicable to the Project, and the Project Description is distinguishable from the project description at issue in *Millennium*.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 107-4

- Finally, I'm concerned about the suggestion that residents and visitors will be taking public transportation. Almost everyone I know that lives in this area drives their cars. Why is the city under the impression that residents will use public transportation? Did you poll the surrounding residents to see if they were willing to ride the bus or subway?

Response to Comment No. 107-4

The transit assumptions in the Project's Draft EIR apply only to the Project's employees and visitors and not to the area residents as suggested in the comment.

Refer to Section B, Transit and TDM Effectiveness, of Topical Response No. 11, Transportation Demand Management, for a discussion on the success of transit and TDM programs in similar studio and entertainment campuses. As discussed therein, there are several examples of major studio and entertainment campuses that have successfully implemented TDM programs for employees and visitors that have far exceeded the 15-percent automobile reductions estimated in the Draft EIR and even exceeded the estimated 20- to 30-percent reductions from the TDM Program. The proposed TDM Ordinance currently under consideration by the City of Los Angeles will require a monitoring program to measure the continuing effectiveness of the Project's TDM Program. If the TDM Program is not meeting its goals, additional TDM strategies will have to be implemented until the Project meets the effectiveness levels discussed in the Draft EIR. Refer also to Response to Comment No. 90-2.

Comment No. 107-5

I'm unable to support this project in its current state. I am anxious to hear your answers to my questions and concerns.

Response to Comment No. 107-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 107-2 through 107-4.

Comment Letter No. 108

Marian Carr
104 S. Formosa Ave.
Los Angeles, CA 90036-2816

Comment No. 108-1

I am a long-time resident of Beverly Fairfax. Recently, I read over the Draft Environmental Impact Report for the Television City Project. I find this draft EIR to be really concerning and found myself with more questions than answers.

Response to Comment No. 108-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 108-2 and 108-3, below.

Comment No. 108-2

In this letter, I am going to outline several of my questions related to the DEIR's alternative mobility plan, specifically. I hope the City and the developer take time to read each of my questions and respond with thorough answers.

Response to Comment No. 108-2

This comment provides a general introductory statement about the alternative mobility plan and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 108-3

Currently, this development proposes that employees and visitors will use alternative means of transportation for live shows. While I concede that (in theory) this would help reduce traffic, I do not see how this plan is feasible in application. What is the plan if Television City is hosting live shows before the future Metro purple line is finished? The Wilshire/Fairfax stop is not expected to be operational until 2024. Will employees and audience members need to use the parking available to residents until the Metro stop is operational? What happens when track maintenance on the purple line is happening? These estimates seem inflated. What additional studies can be conducted to give realistic alternative mobility estimates?

Response to Comment No. 108-3

Refer to Topical Response No. 11, Transportation Demand Management, regarding the effectiveness of TDM programs.

As discussed on page IV.K-38 in Section IV.K, Transportation, of the Draft EIR, the Project's TDM Program would include a shuttle service between the proposed Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project Site, and the shuttle will operate during typical commuter peak periods. Importantly, to be conservative, the Draft EIR's transportation analysis did not account for any trip reductions in connection with the proposed shuttle and/or the Metro D (Purple) Line Wilshire/Fairfax Station. Thus, the commenter's statement regarding inflated estimates is incorrect. It is anticipated that buildout of the Project would occur after the opening of the Metro D (Purple) Line Wilshire/Fairfax Station.

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, and Response to Comment No. 106-2 regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 108-4

Ultimately, I want to make sure this project makes sense for all Beverly Fairfax residents. In its current state, I do not see that being possible. When will the city release a revised DEIR with reflections of the community's wants and needs?

Response to Comment No. 108-4

The Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 108-5

I look forward to hearing your response.

Response to Comment No. 108-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 109

Ty Carrington
421 1/2 Sierra Bonita Ave.
Los Angeles, CA 90036-2464

Comment No. 109-1

I have only lived her one month but I'm not sure that I would have signed the lease if I had known that there was a plan for massive, noisy, polluting construction to take place for the next 20 years.

Response to Comment No. 109-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 109-2.

Comment No. 109-2

I'm curious about the impact of the deep excavation that's part of the plan—the project site is just down the road from the La Brea Tar Pits, where dinosaurs once roamed. It seems obvious that digging down 45 feet across a 25-acre site will reveal many interesting geologic finds in this sensitive area.

Have paleontologists been consulted about where special care should be exercised for the dig? It seems to me that paleontologists and other scientists should be on-site, so the digging can be stopped if bones or fossils are uncovered.

A detailed plan for this element of excavation should be provided for the public to comment on.

Response to Comment No. 109-2

Pursuant to Appendix G of the CEQA Guidelines, Section IV.D, Geology and Soils, of the Draft EIR included an analysis of the Project's potential to impact paleontological resources. Refer to Response to Comment No. 35-90 for a detailed summary of the analysis contained in the Draft EIR and Paleontological Resources Review Memorandum (Appendix F of the Draft EIR). To address potential impacts to paleontological resources, Mitigation Measure GEO-MM-1 requires that a paleontologist be retained to prepare a Paleontological Resource Mitigation and Treatment Plan for the Project. Additionally,

paleontological monitoring would be required during ground disturbance activities within high sensitivity deposits (e.g., Pleistocene age deposits), per Mitigation Measure GEO-MM-1 and as revised (refer to Response to Comment No. 35-91). The monitoring program would follow the guidelines outlined by the Society of Vertebrate Paleontology and include sediment sampling protocols for microfossil recovery. No monitoring would be required during excavation within artificial fill, as these deposits do not contain paleontological resources in their original stratigraphic context and thus have a low sensitivity. In the event of a find, the monitor has the authority to divert and/or re-direct ground-disturbing activities in the area of the find, and rope off a protective barrier of at least 50 feet to evaluate the unanticipated find. Refer to Response to Comment No. 35-91 for a discussion of the revised Mitigation Measure GEO-MM-1. As stated in the Draft EIR, with the implementation of Mitigation Measure GEO-MM-1, impacts to unique paleontological resources would be reduced to a less-than-significant level.

With respect to the commenter's request for an opportunity to provide comment on such plans as the grading and excavation plan for the Project and the Paleontological Resource Mitigation and Treatment Plan, those plans would be submitted as part of the Project's building permit process and would be included as part of the administrative case file for public review.

Comment Letter No. 110

Jean Claude Carron
438 N. Edinburgh Ave.
Los Angeles, CA 90048-2308

Comment No. 110-1

This project is trying to do way too much on this property that is in an already congested area. It needs to be scaled back substantially.

Response to Comment No. 110-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 110-2

I am all for maintaining the existing studio use, but this location is not appropriate for 1.4 million square feet of office and 225' buildings. There is no support in the EIR for why a studio needs this amount and size of office uses to supposedly maintain the studio.

Response to Comment No. 110-2

Refer to Response to Comment No. 11-3 regarding the size and scale of the Project. Refer to Response to Comment No. 26-16 regarding the ratio of the studio land uses. Refer to Response to Comment No. 110-3 below regarding Project objectives.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 110-3

Office space attached to and at the height of the stages should be enough, like the applicant showed at the Neighborhood Council meeting. The height is out of character with this area which consists mainly of 1 and 2 story commercial and residential buildings. If the applicant wants to develop a high-rise office project, it should look to the nearby Wilshire corridor which is planned for tall office towers.

Response to Comment No. 110-3

Refer to Response to Comment No. 11-3 regarding the height of the Project and its relationship to surrounding buildings.

As stated on page II-11 in Section II, Project Description, of the Draft EIR, one of the objectives of the Project is to “complement the neighboring community through design elements that would be compatible with surrounding uses, concentrate building mass and height towards the center of the Project Site, and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses.” To achieve this objective, the Project incorporates site planning and design and architectural elements to complement the scale and character of the surrounding neighborhood, as discussed in Section IV.H, Land Use and Planning, and Appendix I of the Draft EIR. Refer to Response to Comment No. 26-19 for the discussion of the Project’s height zone, frontage, and stepback requirements and how the Project achieves the objective to concentrate height towards the center of the Project Site. Although the maximum height limits are taller than existing buildings in the immediate vicinity, the Project would not be out of character with the area, given that the Project is an infill project located in a highly-urbanized and dense area of the City. In accordance with CEQA and the L.A. CEQA Thresholds Guide, the land use compatibility analysis in Section IV.H, Land Use and Planning, of the Draft EIR considers the uses and density of surrounding development and other physical and operational factors in addition to height.

The comment that the Applicant wants to develop a high-rise office project is incorrect. As discussed throughout the Draft EIR, the Project is a studio project, and the proposed Specific Plan would allow five land uses (i.e., sound stage, production support, production office, general office, and retail). Further, the proposed Specific Plan would limit general office and production office floor area to a maximum of 700,000 square feet each. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-6, and 5-15 regarding the purpose of the Project.

Further, the neighborhood council presentation was an informational presentation to explain modern production needs. The rise of digital media has created the need for larger and taller sound stage volumes, as well as enhanced technological infrastructure and

production office, and the studio eco-system requires office to be located close to sound stages and production support. The industry has changed and become more digitized, which requires much more office space co-located on a campus setting than traditional studios. The proposed development program includes an operationally feasible balance of studio uses to meet modern production needs.

Comment Letter No. 111

Mychael Carter
8261 W. Fourth St.
Los Angeles, CA 90048-4401

Comment No. 111-1

What is the project, exactly? The EIR repeatedly says the plan is “conceptual?” but how are people supposed to comment when the actual specific plan is not provided?

My understanding is this is why the applicant is asking for a 20-year development agreement. I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

Response to Comment No. 111-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description in the Draft EIR, which adequately described the Project and disclosed all elements of the Project required by CEQA; how all plans in an EIR are inherently conceptual; and that CEQA and City policy do not require a draft Specific Plan to be included in an EIR.

The second paragraph of this comment is identical to a portion of Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment No. 111-2

The proposal only has 5,300 parking spaces. This facility will be staffed by 8,000 employees and will also bring with it and thousands of audience members as well, where will the overflow parking be and has that even been studied?

Response to Comment No. 111-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, and Response to Comment No. 106-2 regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 111-3

The EIR makes it clear that there is a draft in the City's files. The Specific Plan should have been given to us to see and review

Response to Comment No. 111-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3. As discussed therein, neither CEQA nor City policy requires a specific plan to be included in either the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment Letter No. 112

Madi Cash
358 S. Mansfield Ave.
Los Angeles, CA 90036-3057

Comment No. 112-1

As a resident of the Fairfax community, I think it is important to raise the issues I have with this plan. There are things across the board that I will outline below to express my concerns.

Response to Comment No. 112-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 112-2 through 112-4.

Comment No. 112-2

First, why is the City so sure that people are going to ride the bus and subway? I have worked in this area for my entire working life, and people drive their cars. So, why does the City have this hunch? Is there any evidence that people are really going to ride public transportation? Have there been any polls? Surveys? Interviews? I am trying to understand why this assumption has been made. Please explain how these assumptions are being made? And why does the city consider the assumptions to be correct? What if the assumptions are actually just incorrect?

Response to Comment No. 112-2

Refer to Topical Response No. 11, Transportation Demand Management, for a discussion of transit and auto reduction experience in other comparable employment projects.

Comment No. 112-3

Second, in the Draft EIR, it is stated that as a result of this project, water use would be six times more than it is now. Why is this not being given more attention or being flagged as having a significant impact? California is in a severe drought, and drought conditions are likely to continue or even worsen. Please give us more detail and address the concerns above.

Response to Comment No. 112-3

Refer to Response to Comment No. 16-66 with regard to the adequacy of water supply and consideration of drought conditions. Refer to Response to Comment No. 26-175 regarding the Project's water demand and impact analysis. Refer to Response to Comment No. 292-2 with regard to the significance threshold for water supply impacts under CEQA.

Comment No. 112-4

And lastly, it is stated that there can be special events at the property. What exactly is a special event? Is that a concert? A play? And outdoor movie screening? How many people are expected to go to special events? How many special events are going to occur per year? Are they going to occur during the weekdays or weekends? How much construction is going to be necessary to set-up and take down special events? During what hours are these special events going to occur? Will loud concerts be allowed at night? Will certain kinds of events be restricted to certain days of the week and specific hours? As a resident with children, I want to gain a better understanding of exactly what these special events are and when they are going to occur to see how they will impact my life.

Response to Comment No. 112-4

Special events would not be regulated by the proposed Specific Plan, do not regularly occur on-site, and would be subject to existing City permitting regulations. Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 112-5

As you see in the above, I have concerns relating to different things with the project as it stands. In order for me to feel even remotely comfortable with considering whether I would support this development or not, I need detailed responses to all of the above!

Response to Comment No. 112-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 112-2 through 112-4.

Comment Letter No. 113

Pedro Castro
518 N. Spaulding Ave.
Los Angeles CA 90036-1845

Comment No. 113-1

As a resident of the neighborhood, I am worried about the addition of office space, studio facilities, a huge parking garage, and more on the Television City site. I understand that living in an urban area means there will be change and growth, but this proposed expansion seems unreasonable for this community, which is already maxed out.

Response to Comment No. 113-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial land use designation and its relation to the size of the Project.

Comment No. 113-2

The Draft EIR for Television City 2050 includes information about special events. I would like more information about what this means. If they are allowed, what are the specifics? When will special events be allowed? At what times and days of the week? Where on the property will special events occur? Are live performances and parties acceptable? What kinds of extended set-up and tear-down is permitted? How will parking be handled when we already have extremely limited resources for that? What is known about how these events will impact the people who live in the area?

Response to Comment No. 113-2

Special events would not be regulated by the proposed Specific Plan, do not regularly occur on-site, and would be subject to existing City permitting regulations. Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 113-3

Another noise-related concern is construction. The EIR seems to state that construction is likely to take two decades. This amount of time could mean the community will have to

bear the burden of trucks, jackhammering, excavation, dumping, clanging materials, and many, many other sounds for a generation. How will this affect the neighborhood? I can't imagine the horror of living through construction sounds like those for that many years.

Response to Comment No. 113-3

Refer to Section IV.I, Noise, of the Draft EIR for a detailed analysis of noise associated with Project construction activities. Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

Comment No. 113-4

A third noise-related problem is the actual productions once the project is complete. The making of movies or television can be incredibly loud, and recording takes place at all hours. What is the plan for communicating such disruptions to the community? How were the production noise impacts determined for the EIR? How will these events affect the quality of life of the nearby neighbors? This information is pertinent to the people who live and work near the facility.

Response to Comment No. 113-4

Noise impacts during operation of the Project were analyzed based on the thresholds in Appendix G of the CEQA Guidelines and were determined to be less than significant. Refer to pages IV.I-43 through IV.I-56 of Section IV.I, Noise, of the Draft EIR. The Project would include a number of PDFs that would reduce noise during operations. Refer to page IV.I-34 of the Draft EIR.

Refer also to Response to Comment Nos. 26-146 regarding noise associated with outdoor production activities during both daytime hours (7:00 A.M. to 10:00 P.M.) and nighttime hours (10:00 P.M. to 7:00 A.M.).

Please note that quality of life is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 113-5

I am appalled that the EIR included information about an objective of the project is to make money for the developer. That is an obvious reason, but for what purpose would the city include that information? How is it the city's business what a private business does? Why

is the developer's financial status a concern of the city? Implied in such a statement is that there is a connection between the developer and the city. If there is, please explain.

Response to Comment No. 113-5

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

This comment raises non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 114

Catherine Ceccola
464 N. Hayworth Ave.
Los Angeles, CA 90048-2704

Comment No. 114-1

I have lived here for 29 years.

Response to Comment No. 114-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 114-2 through 114-5.

Comment No. 114-2

I am very concerned about the impact this will have on our already impacted public parking.

Response to Comment No. 114-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 114-3

We do not need anymore traffic for what looks like will be the next 20 years for the buildout.

Response to Comment No. 114-3

Under SB 743, the CEQA transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). The Draft EIR and the Transportation Assessment analyzed the potential transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would have less than significant transportation impacts.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 114-4

The amount of trucks in the area will create more emissions as well.

Response to Comment No. 114-4

Refer to Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of the Draft EIR and Appendix B of the Draft EIR regarding the air quality and GHG analyses, which accounted for construction trucks and operational trucks.

Comment No. 114-5

If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with the consequences of the increased pollution, noise and traffic, the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 114-5

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective.

It is unclear what pollution the commenter is referring to, but air pollution is analyzed in Section IV.A, Air Quality, of the Draft EIR, and pollution associated with hazards and hazardous materials is analyzed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR.

Refer to Section IV.E, Greenhouse Gas Emissions for the analysis of climate change impacts, Section IV.I, Noise, for the analysis of noise impacts, and Section IV.M.1, Utilities and Service Systems – Water Supply and Infrastructure, Section IV.M.2, Utilities and Service Systems – Wastewater, and Section IV.M.3, Utilities and Service Systems – Energy Infrastructure for the analysis of infrastructure.

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 115

Tera Cederquist
406 N. Gardner St.
Los Angeles, CA 90036-5728

Comment No. 115-1

I have many questions regarding the proposed Television City project. What is the distance of the venue to the three nearest airports? What types of public transit will be available along those routes?

Response to Comment No. 115-1

The Project's proximity to airports is addressed in the Initial Study included as Appendix A of the Draft EIR, as well as in Section VI, Other CEQA Considerations, of the Draft EIR. Refer to pages VI-25 and VI-28 of Section VI, Other CEQA Considerations, of the Draft EIR. As discussed therein, the nearest airport is the Santa Monica Airport located approximately 8.4 miles southwest of the Project Site. The Project Site is also approximately 11 miles to the northeast and southwest, respectively, from both Los Angeles International Airport (LAX) and the Hollywood Burbank International Airport (BUR). It is approximately 46 miles west of the Ontario International Airport (ONT). Note that Long Beach Airport (LGB) is approximately 30 miles southeast from the Project Site but is not an international airport.

Public transit options to/from these airports are unrelated to the CEQA analysis for the Project. Nevertheless, the requested information is provided below for informational purposes.

Public transit connections between the Project Site and the airports above involve multiple seat rides. The travel time to LAX is anywhere between approximately 1.5 and 2.5 hours via shuttle, bus, and/or rail, 1.5 hours to BUR (bus and rail), and 3 hours to ONT (bus and rail). Note that once completed, the Metro D (Purple) Line Wilshire/Fairfax Station, the Metro K (Crenshaw) Line LAX/Metro Transit Center Station, and the LAX Automated People Mover has the potential to provide a quicker connection to BUR and LAX.

The transit services adjacent to and surrounding the Project Site are shown in Figure 12 on page 43 of the Transportation Assessment included in Appendix M.1 of the Draft EIR. In addition to the bus lines and rail stations shown in Figure 12, the Project would include a shuttle bus service between the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction and the Project's Mobility Hub.

Comment No. 115-2

The entertainment venue as proposed in the EIR seems massive... fourteen stages is too many for this community, along with everything else being proposed for the location.

How will it work having fourteen stages? Can multiple stages be used at the same time? Please provide me with specific information regarding the logistics of this multi-stage concert venue. I am confused on why California needs another concert venue. Between Staples Center, Banc of California Stadium, Oracle Arena, and SAP Center, I am concerned about oversaturating the market. What studies were done that show the need for this capacity?

Response to Comment No. 115-2

The Project does not include a concert venue. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five land uses that would be allowed under the proposed Specific Plan.

Comment No. 115-3

The draft EIR refers to large projects that could have a negative impact on nearby businesses. What will be those negative impacts? What large projects are being referred to? What have nearby businesses been told about the proposed projects? We cannot leave behind the businesses that are essential and have an important role in the community.

Response to Comment No. 115-3

An analysis of impacts to business is outside of the scope of CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 115-4

The Farmers Market and the Grove are two of Beverly Fairfax's most popular destinations for people in surrounding areas. These parking lots are typically full, and I am concerned about the impact the venue with fourteen stages and all the other operations of the development will have on these locations. How many parking spaces will be reserved at

the Farmers Market and the Grove for people attending a concert at the proposed venue? What about for the other events mentioned?

Response to Comment No. 115-4

There is no concert venue planned at the Project Site, and this use would not be permitted under the Specific Plan; refer to Topical Response No. 3, Permitted On-Site Uses. Refer to Topical Response No. 3; Section C, Special Events, of Topical Response No. 10, Trip Generation; and Response to Comment No. 66-5 regarding special events.

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking and, thus, is not reserving any parking spaces in The Original Farmers Market or The Grove parking lots. As discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Refer to Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking, for a discussion of the Project's potential parking effects on parking at The Original Farmers Market and The Grove.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 115-5

Both of these locations also have valet parking available from 10AM–10PM. [sic] Will valet parking be offered at the concert venue? If not, what specific measures will be taken to ensure that parking for the Farmers Market and the Grove are reserved for Farmers Market and the Grove customers? The Beverly Fairfax Historic District includes several attractions, and it is essential that the voices of these businesses are heard.

Response to Comment No. 115-5

Refer to Response to Comment Nos. 115-3 and 115-4, above.

Comment No. 115-6

Please provide me with all information regarding plans for the concert venue, use of the fourteen stages, and use of the other development features that will bring many people to the site.

Response to Comment No. 115-6

The Project does not include a concert venue, and a concert venue would not be permitted. Refer to Topical Response No. 3, Permitted On-Site Uses. Section II, Project Description, of the Draft EIR includes a detailed description of the proposed development program. Refer specifically to pages II-12 through II-17 for a description of the proposed development program and Table II-2 on page II-13. Also refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Refer to Topical Response No. 10, Trip Generation, for a discussion of the number of employees and visitors the Project is anticipated to generate.

Comment Letter No. 116

Chris Cedize
8211 Blackburn Ave., Apt. 8
Los Angeles, CA 90048-4229

Comment No. 116-1

I live next to this proposed project, and I am really worried about parking. Our neighborhood is already full with people parking when the nearby shopping parking lots, meters, and businesses have no parking available. It's already frustrating enough not being able to park in my own neighborhood.

From what I understand this project would add 6,000 more employees. That's 6,000 people commuting every day to work. Plus, all of the different kinds of trucks for construction. Why does the DEIR say the project will have 5,300 parking spaces when there could be 6,000 cars. Where will the overflow go?

Response to Comment No. 116-1

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language has been deleted from the Draft EIR.

Topical Response No. 13, Parking, and Response to Comment No. 106-2 explain how the proposed 5,300 parking spaces would be adequate to accommodate all 7,832 employees. This primarily occurs because every individual employee does not drive his/her own car to the Project Site. Many employees ride to work together, while others take transit, walk, or bike to work. When all these alternate modes are taken into account, 5,300 spaces serve the Project without spillover parking.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 107-2 regarding construction trucks and the proposed CTMP.

Comment No. 116-2

The DEIR says that the average employee only commutes 6.7 miles a day. This doesn't seem right. Where did this data come from? How can the applicant already know where the new employees will be coming from to get to and from work there?

Response to Comment No. 116-2

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-156 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths and the provision of empirical data in support of the subject analysis. As substantiated therein, the approach to, and assumptions for, using the City's VMT Calculator tool to analyze the Project's VMT impacts were appropriate, as acknowledged by LADOT in the Assessment Letter that is presented in Appendix M.2 of the Draft EIR.

Comment No. 116-3

Has the city considered the additional traffic during events? What about when there is a live audience during filming? Have they considered all the additional people that will bring?

Response to Comment No. 116-3

The transportation analysis in the Draft EIR fully accounted for all trips generated by the Project (employees, visitors, audience members, production vehicles, deliveries, etc.).

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for a discussion of audience and visitor trips to the Project Site. As concluded therein, audience trips represent a small percentage of total daily Project trip generation.

Comment No. 116-4

I see people parking on my street all the time to go to the farmers market and the Grove. I'm sure this will bring even more traffic. People always use our streets when they don't want to pay for parking. The plan does not provide actual solutions to what all of us who live here know will be actual consequences if the project gets built.

Response to Comment No. 116-4

Also refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project, and Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13 for a discussion of how the adequacy of the on-site parking supply will prevent spillover parking into nearby public parking spaces. Unlike The Original Farmers Market and The Grove, employees and visitors to the Project Site will not be required to pay for on-site parking as part of their entry to the Project Site. Parking would be available at no cost to visitors and audience members, who would therefore have no incentive or reason to search for parking in the adjacent neighborhoods.

Additionally, the provision of neighborhood on-street parking permitting is available to residents through LADOT's Parking Permits Division.

Comment Letter No. 117

Sue Chang
7957 1/2 Blackburn Ave.
Los Angeles, CA 90048-4461

Comment No. 117-1

Before you make decisions about allowing the Television City expansion project, I want to make my concerns known. I am a resident whose voice should be heard.

Response to Comment No. 117-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 117-2 through 117-5.

Comment No. 117-2

The Television City expansion Draft EIR is confusing and unclear. When is the city going to hold public hearings so that the community can really understand what the project will do? Why is there no specific plan required, a plan that provides details rather than general descriptions? How are we supposed to understand impacts of a development that lacks specifics about what is going to be built and the effects? What does getting a Specific Plan mean and why can it lack specifics? Seems contradictory. Please explain exactly how the current codes or zoning for this building and for the property would be changed from what is in place now for this proposed project?

Response to Comment No. 117-2

This comment is identical to Comment No. 57-2. Refer to Response to Comment No. 57-2, above.

Comment No. 117-3

Another concern about this project is that it will lead to more development. If Television City's expansion happens, then the general plan for the community will change, won't it? Will this change open the door to more development? What kinds of development would then be allowed? How does the EIR address how this development will lead to even more? Does that mean that future projects wouldn't have to be approved? It is not acceptable that the Television City project would be an umbrella project for other projects and development, but is that what would happen?

Response to Comment No. 117-3

This comment is identical to Comment No. 57-3. Refer to Response to Comment No. 57-3, above.

Comment No. 117-4

Parking for the tremendous increase of workers at a new, larger facility will be a problem. The EIR says there are more than 5,000 spaces to be added at the site with more located offsite. That number of parking spaces doesn't even match the expected number of new employees, so what about those that can't park on site? What does offsite mean? And where is offsite? Will more parking spaces be created in other parts of the neighborhood? If so, how will that impact the area surrounding the project?

Response to Comment No. 117-4

As discussed in Section II, Project Description, of the Draft EIR, there are currently 1,510 parking spaces on the Project Site, and the Project is proposing 5,300 total parking spaces. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language has been deleted from the Draft EIR.

Comment No. 117-5

I believe Television City should not increase in size because of the potential for even more development and quality of life impacts for the community.

Response to Comment No. 117-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 118

Tessa Chapman
537 N. Orlando Ave., Apt. 5
Los Angeles, CA 90048-2530

Comment No. 118-1

I am a resident of the Beverly Fairfax area, and I am incredibly concerned about the potential impact of the proposed studio development.

Response to Comment No. 118-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 118-2

My main concerns include traffic, parking, safety, and the environmental impact.

Response to Comment No. 118-2

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding parking, under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, employees and visitors of the Project would not require off-site parking.

Refer to Section IV of the Draft EIR, which contains a comprehensive analysis of the potential environmental impacts of the Project.

Comment No. 118-3

It is almost certain that this project will bring thousands of commuter vehicles and delivery trucks. I have deep concerns about trucks and cars obstructing the lanes and thruways for

emergency vehicles that respond to patients at the Cedars for emergency services. I worry that with increased traffic and parking on the nearby streets will only hinder the ability of medical personal to perform their duties and meet the needs of patients and residents. How do you plan to manage the traffic so emergency vehicles won't be affected by construction traffic? Who will be responsible if a citizen isn't able to make it to the hospital in time?

Has there been a traffic study on the impacts of this project during construction and when it is complete? Do they know how many additional trucks and cars will be placed on the neighboring roads as a result of this proposed construction? Do they know what parking looks like around the Cedars? How far from the Cedars will the trucks be parking? Will there ever be periods where they are blocking access to emergency vehicles?

Response to Comment No. 118-3

This comment discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-19 for a discussion of emergency vehicle response in the area. As described therein, the Project would not increase the number of LOS E or F intersections along the key corridors within the Study Area, including the arterial streets serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles (police, paramedics, ambulances) are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

The comment is correct that there would be additional traffic on the area roadway system as a result of the Project. Accordingly, a Transportation Assessment (Appendix K.1 of the Draft EIR) was prepared to analyze the effects of additional Project vehicles on the operation of the street system. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 regarding trips generated by construction. The off-site staging and parking for construction vehicles referred to in the comment are no longer part of the Project. All construction haul truck staging will take place on the Project Site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 118-4

It's unclear exactly how long it will take the developer to build this project, but I know it will be a very long time. My understanding is that it will take at least 20 years. If there is a traffic study, did the study look at how the traffic and thru-traffic will change over almost two decades? Do you know how the neighborhood will change over the next two decades to be able to produce an accurate study? Since this project will take at least 20 years, does that mean we will have thousands and thousands of trucks driving through our community during this entire time?

Response to Comment No. 118-4

Refer to Response to Comment No. 9-24 regarding the buildout timeline. Refer to pages IV.K-80 to IV.K-81 in Section IV.K, Transportation, of the Draft EIR for an analysis of potential impacts under a long-term buildout scenario. As stated therein, the Project's impact analyses per the CEQA Guidelines Appendix G transportation thresholds and the TAG are not dependent upon the Project buildout date, and, therefore, the results and conclusions presented in Section IV.K of the Draft EIR are applicable to a long-term completion date. As verification of the analysis, the traffic growth assumed for the year 2026 (using the conservative methodology of adding all related project traffic to an ambient growth rate of 1 percent per year) was compared to the SCAG regional model's project of traffic growth in the area, and the SCAG model actually projected less growth by year 2040 than is assumed for the 2026 volumes used in the Project transportation analysis. As such, a later buildout date would not affect the Draft EIR's transportation analysis and less-than-significant impact conclusions.

The LADOT TAG outlines a methodology for evaluating the potential for traffic to cut through residential streets. That methodology was followed, and two areas were identified as potential cut-through trip locations. These areas will be the subject of a neighborhood traffic study through the NTMP process, which is part of the Project's Transportation Improvement Program.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA cut-through analysis.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 above for a discussion of construction trips. The Applicant intends to build the Project in one phase which would mean that the construction would be completed in a 32-month time period.

Comment No. 118-5

I don't understand how any resident that calls the Beverly Fairfax neighborhood can be okay with this.

Response to Comment No. 118-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 118-6

Our quality of life will greatly diminish if we have thousands of construction and dump trucks driving through our community almost every day for the next twenty years. Not to mention, the impact that construction will have on air quality, community safety, walkability of our neighborhood, and noise levels. How do you plan to protect the quality of life of the residents that have called this neighborhood home for so long? How is the city going to manage this project to ensure our roads, communities, and residents aren't severely burdened in the process?

Response to Comment No. 118-6

The assertion about thousands of construction trucks is incorrect. Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding the number of construction trucks, the construction timeline, and safety and pedestrian access during construction.

With respect to air quality, as discussed on pages IV.A-63 through IV.A-66 of Section IV.A, Air Quality, of the Draft EIR, construction of the Project would not result in any significant localized air quality impacts.

With respect to safety, refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the ability of LAPD to accommodate the demand for police protection services associated with the Project.

With respect to noise, as discussed on page IV.I-57 and IV.I-58 of Section IV.I, Noise, of the Draft EIR, construction activities would result in short-term noise impacts to the Broadcast Center Apartments (Receptor R1), which is adjacent to the Project Site. Impacts at receptors further away from the Project Site would be less than significant with mitigation.

Note that the comments regarding walkability, quality of life, and unspecified burdens are not environmental issues specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 119

Ed Chau
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 119-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 119-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 120

Aida Chazar
132 N. Detroit St.
Los Angeles, CA 90036-2916

Comment No. 120-1

I am writing regarding the Draft EIR (ENV-2021-4091) TVC 2050 Project. Please see my concerns below:

Response to Comment No. 120-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 120-2

I am concerned that it appears the developer can build a cornucopia of different projects on the site. The Draft EIR identifies a “conceptual” site plan but it can be modified at the developer’s whim. How is this possible? The project must be clearly defined in an EIR so the public has the opportunity to know exactly what is being proposed. A nebulous project description must be modified to provide specifics about a project. The public cannot comment on a chameleon project as any comments specific to what is conceptual in nature become meaningless. The Draft EIR has failed in this regard. It must provide a clear and concrete project description and recirculated for proper project review and comment.

Response to Comment No. 120-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Conceptual Site Plan that was analyzed in the Draft EIR; how all plans in an EIR are inherently conceptual; the level of detail required in an EIR for a specific plan project; how Section II, Project Description, of the Draft EIR complies with CEQA and includes sufficient information to evaluate the environmental impacts of the Project; and the required discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project that was analyzed in the EIR. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 120-3

It also appears that the uses permitted by the absent Specific Plan will be limitless. The Draft EIR indicates that any use in the C2 zone would be permitted, and then some. What are the specific uses permitted? How can the public know what impacts these uses will have on the community if they are not specifically identified. The Specific Plan should have been included as part of the Draft EIR wherein the public could see the various uses permitted by the Specific Plan. However, the Draft EIR was released sans the Specific Plan—not helpful.

Response to Comment No. 120-3

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the permitted on-site land uses set forth in the proposed Specific Plan. As discussed therein, based on comments received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project, including the removal of the C2 zone text referenced by the commenter; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses (i.e., sound stage, production support, production office, general office, and retail) as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the EIR. Please note that the proposed Specific Plan includes the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of the Final EIR.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and in Response to Comment No. 5-3, CEQA and City policy do not require a draft Specific Plan to be included in a Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website prior to the publication of this Final EIR.

Comment No. 120-4

I was taken aback by some of the objectives of the Draft EIR. Specifically, the objective wherein the developer informs that public that financial risks are involved with the development of the project. Please explain why this objective is relevant to the environmental review process. There is an inherent financial risk with all projects and this

information is not relevant to the public's review of the potential environmental impacts of a project. This objective has no business being included in the Draft EIR.

Response to Comment No. 120-4

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 120-5

The Draft EIR indicates the project could be built in 32 months or 20 years. That is quite a time difference. When will the public be informed of the actual build-out date of the project? Please explain how each impact area of the Draft EIR took into consideration the difference between these two timeframes and their relevant environmental impacts

Response to Comment No. 120-5

Refer to Response to Comment No. 9-24 regarding the construction timeline.

Comment Letter No. 121

Julietta Chemian
230 S. Detroit St.
Los Angeles, CA 90036-3034

Comment No. 121-1

As a 42 year resident the proposed TVC 2050 plan raises numerous concerns and questions, some of which I attempt to outline in this letter.

Response to Comment No. 121-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 121-2 through 121-7.

Comment No. 121-2

Parking is a huge issue for the residents, business patrons, and visitors to the Beverly Fairfax community, and there is limited parking throughout the area. Our local post office can attest to how challenging it is just to monitor and control the non-post office parking that occurs in that parking lot. All of the perimeter streets have parking spots that are always full and always at a premium.

Response to Comment No. 121-2

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

This comment discusses non-CEQA parking issues that are not specific to the Project. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 121-3

Yet, this plan calls for the replacement of existing on-street metered parking spaces by commercial landing zones. On what basis was that decision made? Which metered spaces on what streets will be affected? How many on street parking spaces will be removed? How were these amounts determined? Will the large parking structure being

proposed, with the addition of more than 5,000 spaces, be available for public parking since the project will remove metered spaces that are available now?

Response to Comment No. 121-3

With respect to metered parking, the Project does not propose to remove any such parking spaces.

Refer to Topical Response No. 13, Parking, and Response to Comment No. 117-4 above for a discussion of parking.

Comment No. 121-4

Parking in the nearby streets of the surrounding neighborhoods is going to be a problem. It already is a problem. So what is an off-site parking agreement or covenant? What terms are provided for in that kind of an agreement? Is it between the development and the city? If so, what about those who live and work there who will be impacted by what the agreement states? What constitutes an agreement or covenant being deemed “satisfactory” to the Planning Director? When is the opportunity for the community and affected residents and businesses to know about and provide input into the agreement or covenant?

Response to Comment No. 121-4

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language referenced above has been deleted from the Draft EIR. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 121-5

Where would temporary off-site parking be? What constitutes temporary? Who would be displaced by production filming and related activities? What are the related activities? Is the draft EIR referring to employees at the site being displaced? What does that entail, when and for what reasons? So where would they park temporarily? In our neighborhoods? In the parking lots of nearby businesses, like the Grove and Farmer’s Market, or Whole Foods lot?

Response to Comment No. 121-5

Refer to Response to Comment No. 121-4.

Comment No. 121-6

There is a considerable amount of information that has simply not been shared with the community. Even with a comment period, this project is much too complex and large for most members of the public to understand details and know all the questions to ask to find out more.

Response to Comment No. 121-6

The Draft EIR was completed in accordance with the requirements of CEQA. Under CEQA, EIRs are informational documents intended to inform the public and decision-makers about the potential environmental impacts of a project. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

As discussed in Response to Comment No. 32-3, the 60-day comment period exceeded the typical 45-day period required under CEQA. Following the publication of this Final EIR, the Project approvals and EIR will be considered during public hearings and meetings before City decision-makers prior to any. The public will have additional opportunities to comment on the Project at upcoming meetings and hearings, the dates of which will be published in accordance with the City's noticing requirements.

Comment No. 121-7

When is the city's public hearing going to be held before the EIR moves so far down the process that the community's input will be too late?

Response to Comment No. 121-7

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day period required under CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during public hearings and meetings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings. Noticing for hearings will be sent in accordance with state law. Notices will be sent to everyone who commented on the Draft EIR.

Comment Letter No. 122

Cliff Cheng
our.neighborhood@gmail.com

Comment No. 122-1

I have lived within 500ft. [sic] of CBS-TV City since 5th grade, which was at Hancock Park ES, 3 doors from CBS TV City. Further up Fairfax is where I went to high school. Our family is against the Hackman CBS TV City project.

Response to Comment No. 122-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 122-2 through 122-7.

Comment No. 122-2

Its [sic] too big and will adversely impact the neighborhood.

Response to Comment No. 122-2

Refer to Response to Comment No. 11-3 regarding the size of the Project and its compatibility with the surrounding area.

This commenter's opinion on the Project does not raise a specific comment on the analysis of environmental impacts contained in the Draft EIR. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 122-3

The infrastructure in the neighborhood is inadequate.

Response to Comment No. 122-3

It is not clear precisely what infrastructure the commenter is referring to. The Draft EIR adequately analyzed the Project's potential impacts to surrounding infrastructure; refer to Section IV.K, Transportation; IV.M.1 Utilities and Service Systems—Water Supply and Infrastructure; IV.M.2, Utilities and Service Systems—Wastewater; and IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure.

Section IV.H, Land Use and Planning, of the Draft EIR also includes a discussion of infrastructure as it relates to land use planning.

Comment No. 122-4

I worked in film as a young man. This is not an industry amenable to taking mass transit, even after the Purple Line is finished. The hours are very long. If you are a 2nd or 3rd Assistant Director you are the last to leave. The lighting and grip crew may get done around 1 or 2 am. If your show is using prosthetic makeup, the makeup people and actors may have to start at 3 am. People who would have to commute during those hours would be afraid of the crime on trains and buses at that hour.

Response to Comment No. 122-4

The primary expectation of transit usage by Project employees would be for those employees who work hours closer to a typical office commuter shift. If the employees described in the comment did not use transit, it would not affect the overall conclusions of the Transportation Assessment included as Appendix M.1 of the Draft EIR. Additionally, if employees with vehicles were working during the hours suggested by the commenter, their trips would occur outside of normal business hours and peak commuting periods.

The calculation of the VMT by Project employees would be far more influenced by the vast majority of the employees that work daytime shifts than by the far fewer number of employees who work the hours described in the comment.

With respect to crime on public transportation, this is the responsibility of the transit agency and not an individual project.

Comment No. 122-5

Production requires many heavy truck trips at all hours. This industrial use is incompatible with our residential neighborhood.

Response to Comment No. 122-5

Production truck activities occur primarily during business hours, and almost exclusively outside of overnight hours. Based on the data provided in the truck trip memo included as Appendix FEIR-6 of this Final EIR, based on three days of truck data collected at the Project Site under existing operations, nearly 90 percent of all truck activity occurred between the hours of 7 A.M. and 8 P.M., and nearly 95 percent occurred between 6 A.M. and 9 P.M. The remaining 5 percent of truck trips, equating to low single-digit numbers of trips, arrived or departed after 9 P.M. and before 6 A.M.

Media production activities are not considered industrial uses under the LAMC and the Project would continue the existing studio uses that are already permitted by the City at this location. The Project Site is surrounded by a diverse mix of commercial uses, and the apartment building directly northeast of the Project Site is the only adjacent residential use. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the compatibility of the proposed uses with surrounding land uses, and concluded that impacts would be less than significant.

As shown in Table IV.I-17 of the Draft EIR, the Project's transportation noise impacts would be less than significant. Also, refer to Response to Comment No. 26-141 for a discussion of noise from trucks during operation, including off-site roadway and on-site vehicle noise.

Comment No. 122-6

Why does LA City not widen 1-lane Fairfax between Olympic and Venice as it did widen Overland about 20 years ago? How are you going to increase the capacity of the already overcrowded streets in Fairfax District to handle Hackman's additional traffic?

Just in-case [sic] anyone wants to remove 1 of the 2 lanes which are already jammed in Fairfax District and give it over to able bodied bikers, at the expense of the majority who is [sic] trying to get to work. I oppose removing traffic lanes for bike lanes. It is ableist and ageist. It favors the young at the expense of older and disabled people who can not ride bikes. Bikes are not mass transit. Build more train lines and parking structures to go with them.

Response to Comment No. 122-6

The comment about roadway widening on Fairfax Avenue between Olympic Boulevard and Venice Boulevard is not specific to the Project, and no further response is required. Nevertheless, this comment has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Under SB 743, roadway capacity and congestion are no longer considered in the evaluation of transportation impacts under CEQA. As described in Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, State¹⁵² and City¹⁵³ CEQA guidelines discourage the addition of roadway capacity to deal with increased congestion

¹⁵² Governor's Office of Planning & Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, Appendix 2, December 2018.

¹⁵³ LADOT, Transportation Assessment Guidelines, August 2022, p. 2-12.

because it generally leads to increased VMT. The Project proposes Project Design Feature TR-PDF-2, described on pages IV.K-37 to IV.K-40 of the Draft EIR, which consists of a comprehensive TDM Program to reduce single-occupant vehicle trips and promote alternative modes of travel. Refer to Topical Response No. 11, Transportation Demand Management.

Project Design Feature TR-PDF-2 includes a contribution toward the implementation of bicycle facilities within the Study Area in accordance with the City's Mobility Plan, to be used as needed by the City. The Project does not propose removing vehicle lanes to install bicycle lanes.

Comment No. 122-7

The window dressing plans on parking and traffic is [sic] PR fluff. When the Gilmore Station project came in, Fairfax and 3rd, 2 doors from CBS TV City and across the street. There was no requirement to have employee parking. Trader Joes [sic] does not provide employee parking. LADOT said that there will be no traffic and parking change on the 100 S. block of Hayworth. People use Hayworth to get to and from Trader Joes [sic] counter to LADOT's plan. LADoT [sic] allows people to print out at home day parking passes. Apt. renters on Hayworth are selling these passes to employees of Trader Joes [sic] and other businesses. LADoT [sic] says it does not have enough manpower to deal with illegally sold parking permits. The Hackman Project will many times magnify the existing problems.

Response to Comment No. 122-7

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

The Project includes the development of a NTMP, which could include strategies to prevent cut-through trips in the neighborhoods and enforcement of residential parking permits. For further discussion on the NTMP, refer to Topical Response No. 9, Neighborhood Traffic Management Plan.

This comment discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 122-8

You may contact me via email if you have any questions regarding our concerns. NO ONE ELSE IS AUTHORIZED TO CONTACT US.

Response to Comment No. 122-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 123

Carol Chin
419 N. Flores St.
Los Angeles CA 90048-2611

Comment No. 123-1

I am writing to voice my strong opposition to the proposed CBS building development in the Beverly Fairfax area. I feel I speak for most of the residents who feel that this project will be hazardous, disruptive, and overall, a bad deal for neighbors and members of the community.

Response to Comment No. 123-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 123-2 and 123-3.

Refer to Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As concluded therein, the Project's impacts related to hazards would be less than significant.

The remainder of this comment discusses a number of non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 123-2

While the project is being constructed, we see are [sic] expecting large trucks driving through are neighborhood each morning and evening. What hours of the day and how many days a week will those trucks be allowed to enter and exit the site? Are there any kinds of trucks that will not be able to enter the site and have to park on the street, with a lane being closed as a result? Where is that expected to occur? There are some trucks, maybe those carrying large equipment, that will not be able to negotiate a turn from a lane into one of the access driveways, so are those the trucks that will have to park in the street? How long will they be allowed to take up a lane?

Response to Comment No. 123-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 for information about the trips generated by construction.

Refer to Response to Comment No. 26-E.4-15 regarding truck maneuvers and access.

Comment No. 123-3

Also, these trucks will create lots of noise and spew lots of exhaust. What are the thresholds for how much exhaust can be emitted? Will the trucks be gas or diesel? At a time when smog levels are on the rise, I can only imagine the added noxious fumes our kids and family members will have to breath. Will any of the trucks be carrying hazardous materials? What kind? What are the restrictions as to truck travel with hazardous materials in our neighborhood?

Response to Comment No. 123-3

Tables IV.A-6 and IV.A-8 in Section IV.A, Air Quality, of the Draft EIR present, respectively, the unmitigated and mitigated regional criteria air pollutant emissions associated with construction activity, including construction truck trips and any associated vehicle idling. These tables provide the SCAQMD significance thresholds. As shown on page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, the excavation/foundation construction phase would include approximately 640 daily truck trips over 185 working days and the trucks would be diesel. Please refer to Response to Comment No. 26-30 for a discussion of the Project's CalEEMod model accounting for all Project-related hauling. As discussed therein, potential impacts were evaluated at the closest off-site sensitive receptor, which is the residential use located directly east of the Project Site boundary. The localized impact analysis included both off-road (e.g., bulldozers, loaders, and excavators) and on-site on-road vehicles (e.g., haul and delivery truck travel and idle time). As shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with the incorporation of mitigation measures. Refer to Topical Response No. 14, Construction Vehicle Impacts.

As discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, the Project would be in full compliance with all applicable federal, state, and local regulatory requirements concerning the transport, use, storage, management, and disposal of hazardous materials. Additionally, as discussed in Section II, Project Description, of the Draft EIR, it is conservatively assumed that an estimated 60,000 cubic yards of soil export may include hazardous soil materials which would be exported to Buttonwillow Landfill in Kern County. All haul trucks would be required to follow haul routes approved by LADOT.

As such, as concluded in the Draft EIR, Project construction activities would not create a significant hazard to the public or the environment through the use, handling, transport, or disposal of hazardous materials during construction. Refer to Response to Comment No. 26-83 regarding hazardous soil.

Comment No. 123-4

Before, you rubber stamp this proposal, I strongly encourage you to listen the voices of those living here and to hear our needs. We cannot be disregarded in this matter.

Response to Comment No. 123-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 123-2 and 123-3.

Comment Letter No. 124

Yoonha Choi
119 N. Kilkea Dr.
Los Angeles, CA 90048-3523

Comment No. 124-1

I am writing to express concerns about the proposed Television City project. This explosive growth to the area will have a profound impact on traffic, parking, and noise for the neighborhood surrounding Television City, which is home to thousands of LA residents. I have some concerns and questions that I would like to share with you.

Response to Comment No. 124-1

This introductory comment expresses concerns that are addressed in Response to Comment Nos. 124-2 through 124-7.

Comment No. 124-2

- 1.) I am concerned that increased traffic from this new expansion will spill over from the main streets around the project onto the residential streets where so many of us live. This increase in traffic will make our neighborhoods louder and more unsafe. What study has been done to determine how much drive-through traffic is expected? What neighborhood streets does the study indicate will be most impacted? What the study done during both when schools are in session and during the summer months? Because there is already so much drive-through traffic in the mornings and afternoons when schools are back in session.

Response to Comment No. 124-2

Refer to Section B, Cut-Through Effects on Adjacent Neighborhoods, of Topical Response No. 9, Neighborhood Traffic Management Plan, for a discussion of the potential effects of spillover trips into the adjacent neighborhoods. As part of the non-CEQA analysis, the Transportation Assessment included in Appendix M.1 of the Draft EIR identifies the neighborhood streets most likely to be affected by Project trips and it estimates the potential maximum quantity of cut-through trips.

Regarding safety, refer to Topical Response No. 12, Safety and Congestion.

The Transportation Assessment is based on traffic counts taken when schools were in session, which is required by LADOT because, as described in the comment, this represents the time of the year when traffic levels are at their highest.

Traffic noise was included in the CEQA operational noise analysis provided on pages IV.I-48 through IV.I-54 in Section IV.I, Noise, of the Draft EIR. As demonstrated therein, impacts with respect to traffic noise would be less than significant.

Comment No. 124-3

- 2.) The increased traffic will also increase air pollution in the area, when air quality is already a concern for those of us who live here. What studies have taken place to identify and understand the impact of all the increased traffic on air quality? What about all the increased idling that will happen because of more congestion? What do the studies say about worsening air quality that will result from even more idling cars and trucks?

Response to Comment No. 124-3

The Draft EIR comprehensively analyzed the Project's potential air quality impacts during construction, including impacts from construction vehicles, in Section IV.A, Air Quality, and Appendix B of the Draft EIR in accordance with CEQA. Table IV.A-8 in Section IV.A, Air Quality, of the Draft EIR presents the mitigated regional criteria air pollutant emissions associated with construction activity, including construction truck trips and any associated vehicle idling. Table IV.A-7 in Section IV.A, Air Quality, of the Draft EIR presents the regional criteria air pollutant emissions associated with operations. Table IV.A-12 in Section IV.A, Air Quality, of the Draft EIR presents the mitigated overlapping construction and operational regional emissions under the long-term buildout scenario. These tables compare the Project's emissions against the applicable SCAQMD regional significance thresholds. As discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips (idling cars and trucks) associated with the Project, combined with background roadway trips, would not approach the screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects resulting from increased trips.

Refer also to Response to Comment No. 53-2 regarding localized impacts related to construction trips.

Comment No. 124-4

- 3.) How will the noise and road safety be affected in our neighborhoods when more cars are driving through? I would also like to ask how this will be addressed to make sure our neighborhood streets remain safe?

Response to Comment No. 124-4

Traffic safety in the neighborhoods is a critical focus of the NTMP process described in Topical Response No. 9, Neighborhood Traffic Management Plan. The affected neighbors will work with the Applicant and with LADOT to develop a plan to monitor and respond to cut-through trips along the neighborhood streets in the affected neighborhood areas. Refer also to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 16-5. With respect to noise, traffic noise was included in the CEQA operational noise analysis provided on pages IV.I-48 through IV.I-54 in Section IV.I, Noise, of the Draft EIR. As demonstrated therein, impacts with respect to traffic noise would be less than significant.

Comment No. 124-5

- 4.) I am also concerned that with thousands of additional people coming into our neighborhood every day, it will make it even harder for us residents to find parking spaces. Visitors to Television City already often park in our neighborhoods. What is going to be done to make sure that the additional workers, personnel and visitors don't park in the neighborhoods? Has the city looked at how parking will be impacted? What steps will be taken to monitor the parking situation?

Response to Comment No. 124-5

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 124-6

- 5.) The project is going to being [sic] so many large, noisy and polluting construction vehicles into the area. Will there be specific places these vehicles have to come and go from? Or will I find them in my neighborhood? Is the city going to study how the construction vehicles will impact air quality for the residents? What about all the dirt and dust that gets blown around from the construction trucks—how much is expected and what will be done to address those issues?

Response to Comment No. 124-6

Refer to Response to Comment No. 107-2 regarding the haul routes and trips. LADOT has approved three haul routes for the trucks moving dirt and debris from the Project Site to the Irwindale landfill. Those three routes are explained in Topical Response No. 14, Construction Vehicle Impacts, and are:

- Fairfax to I-10 to Irwindale
- Fairfax to San Vicente to La Brea to I-10 to Irwindale
- Beverly to La Brea to I-10 to Irwindale

Three routes were selected to minimize the impacts on any one route.

Trucks would not be allowed on residential streets. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD. A construction manager would be appointed by the Project and his/her phone number would be advertised on the Project website and communicated to the neighbors so that trucks on the local streets could be reported to the construction manager who in turn could call for targeted enforcement.

The CTMP prepared pursuant to Project Design Feature TR-PDF-1 would address tarps and covers on haul trucks and watering on the site itself to reduce blowing dust and dirt. The Project is also subject to SCAQMD Rule 403 regarding fugitive dust. Refer also to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust.

The Draft EIR comprehensively analyzed the Project's potential air quality impacts during construction, including impacts from construction vehicles, in Section IV.A, Air Quality, and Appendix B of the Draft EIR, in accordance with CEQA. Table IV.A-8 in Section IV.A, Air Quality, of the Draft EIR presents the mitigated regional criteria air pollutant emissions associated with construction activity, including construction truck trips. Mitigation Measure AIR-MM-3 requires construction staging to be located away from residential uses. Additionally, SCAQMD Rule 403—Fugitive Dust, as described on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, requires the use of dust control measures, including anti-trackout measures and watering of disturbed construction areas.

Noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.I, Noise, of the Draft EIR. As discussed in Section IV.I, Noise, of the Draft EIR, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. All other noise impacts would be less than significant.

Comment No. 124-7

- 6.) What steps are going to be taken to ensure traffic safety with all those trucks during the construction period, and even after construction when so many more people will be driving in and out of the site?

Response to Comment No. 124-7

The CTMP required pursuant to Project Design Feature TR-PDF-1 would specifically address the movement of construction trucks in and out of the Project Site during the various stages of Project construction. Turning movement restrictions at the key driveways will play a big part in the overall safety strategy for construction trucks as will the development and enforcement of truck haul routes which will limit the roadways that Project haul trucks can utilize to/from the Project Site.

Construction trucks would be staged on-site so that no roadway travel lanes would be blocked by a line of waiting trucks. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Post construction, during the day-to-day operation of the Project Site, the vast majority of the trips in and out of the Project Site will occur at the three driveways controlled by traffic signals. Refer to Topical Response No. 12, Safety and Congestion.

Comment No. 124-8

I do not believe this project is right for the community, and I hope you will oppose it. I also hope that you will take steps to better explain how this project might impact residents, because the EIR certainly leaves me with more questions than answers.

Response to Comment No. 124-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 124-2 through 124-7.

Comment Letter No. 125

Mateo Ciarlo
748 N. Detroit St.
Los Angeles, CA 90046-7606

Comment No. 125-1

I hope this letter finds you well. I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I'm devastated as I continue to learn about the details (although not many have been provided to the public) about this development right in my back yard.

I can't fathom how city leaders, like you all, would allow for something like this.

Response to Comment No. 125-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 125-2

We have so many questions as neighbors: How do you expect all these new employees to get to work? Where do they park? How am I, as a neighbor, supposed to navigate this new congestion on the streets? Do any of you all live this area? Are you not concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Response to Comment No. 125-2

This comment is identical to Comment No. 95-2. Refer to Response to Comment No. 95-2, above.

Comment No. 125-3

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Response to Comment No. 125-3

This comment is identical to Comment 95-3. Refer to Response to Comment No. 95-3, above.

Comment No. 125-4

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I pray and hope that you do the same with this development. We need more leaders fighting for a better future, not just fighting for a big check.

Response to Comment No. 125-4

This comment is identical to Comment 95-4. Refer to Response to Comment No. 95-4, above.

Comment Letter No. 126

Sylvester Civauro
6521 Drexel Ave.
Los Angeles CA 90048-4707

Comment No. 126-1

The proposed Television City Project is a bad deal for the residents who live in the neighborhoods in and around Beverly Fairfax and for our environment. Allowing increased traffic and commuter delays directly leads to road congestion with increasing idling by more cars not able to move and by the construction and dump trucks that will be needed for the project.

Response to Comment No. 126-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not transportation impacts under CEQA. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction trucks.

Section 3.d in Section IV.A, Air Quality, of the Draft EIR also analyzed air quality impacts associated with Project vehicle trips related to traffic congestion and idling at intersections within the Project vicinity. Consistent with the carbon monoxide (CO) methodology discussed on page IV.A-45 in Section IV.A, Air Quality, of the Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At Project buildout, the highest average number of daily trips at an intersection would be approximately 65,260 trips at La Brea Avenue and Beverly Boulevard, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP. Therefore, the Draft EIR correctly concluded that the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots, and impacts related to localized mobile source CO emissions would be less than significant. Thus, no sensitive receptors would be impacted by Project-related vehicular air emissions due to the Project.

Comment No. 126-2

Idling is the worst thing you can do for the planet as a driver and to at-risk populations who already suffer from asthma and breathing issues. What is the applicant for this project actually going to be able to do to make sure there is no more idling related to the project than currently occurs with the traffic we already have? Because of the applicant cannot ensure this, then the project should not be approved.

Traffic idling also creates unhealthy air and will add the already unbreathable air quality in our area. Our air quality is already terrible. Please consider the health of residents.

Response to Comment No. 126-2

The Draft EIR comprehensively analyzed the Project's potential air quality impacts during construction, including impacts from construction vehicles and any associated vehicle idling, in Section IV.A, Air Quality, and Appendix B of the Draft EIR based on the significance thresholds in Appendix G of the CEQA Guidelines. All haul truck staging would occur on-site, so no haul truck idling would occur off-site. As stated on page IV.A-72 in Section IV.A, Air Quality, of the Draft EIR, Project trucks would be limited by CARB-mandated airborne toxic control measures requirements to idle no more than five minutes at any given time. A PDF, included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, requires the installation of electrical tie-ins at basecamp locations to reduce vehicle idling on-site during operations. Pursuant to CEQA, a Mitigation Monitoring Program will be implemented, including reporting and/or monitoring and enforcement procedures, to support the implementation of the PDFs and mitigation measures included in the EIR.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds, and impacts would be less than significant.

Comment Letter No. 127

James Clark
606 N. Fuller Ave.
Los Angeles, CA 90036-1939

Comment No. 127-1

I have concerns with the proposed Television City construction project. As a local, I want to know what is potentially going to be built and how it will change my neighborhood.

Response to Comment No. 127-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 127-2 through 127-7.

Comment No. 127-2

I'm concerned about the amount of traffic in our already congested area.

Response to Comment No. 127-2

This comment provides a general statement about the condition of traffic in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 127-3

I am also very concerned about increased water usage and the stress it will bring to our water table.

Response to Comment No. 127-3

Refer to Response to Comment Nos. 16-66, 26-175, and 26-176 with regard to the adequacy of water supply.

Refer to Responses to Comment Nos. 3-7, 11-25, 16-85, and 26-69 for a detailed discussion of the groundwater hydrology and groundwater resources.

Comment No. 127-4

The site is right in the middle of a neighborhood with schools, religious organizations, museums and Pan Pacific Park. How will the increased car and truck traffic for construction and then the increased traffic for employees in the enlarged Television City impact the health of residents?, of the school children? and of visitors to the park? How will increased exhaust from diesel trucks negatively affect these people, particularly people at risk? What is the analysis of the impacts to the most at-risk populations such as children, people with asthma, seniors, and what were the conclusions? How many different at-risk groups live in this area? And how close are they to the project site?

Response to Comment No. 127-4

Refer to Section IV.A, Air Quality, and Appendix B of the Draft EIR for a comprehensive analysis of the Project's potential air quality impacts in accordance with CEQA. As discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips associated with the Project would not approach screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects resulting from increased trips. Refer also to Response to Comment No. 53-2 regarding localized impacts related to construction trips. Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project. The HRA utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children and seniors. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased truck trips associated with future operations, would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact. A comprehensive description of assumptions and receptors analyzed in the HRA is included as Appendix FEIR-10 of this Final EIR.

Comment No. 127-5

Another impact that needs to be further explained in the EIR is noise from all those trucks and from the construction itself. During construction, how much increased sound will occur? [sic] and what will be the impacts of the different sources of noise to the residents 'and others 'hearing? [sic] If construction takes two decades or more, how much does that increase the impact on people's hearing? How much does it impact quality of life? Construction noise is annoying at best and harmful at worst.

Response to Comment No. 127-5

Construction noise, including noise associated with construction trucks, is fully analyzed in the Draft EIR. Refer to pages IV.I-35 through IV.I-59 of Section IV.I, Noise, of the Draft EIR.

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise. Response to Comment No. 26-138 also includes a discussion of noise exposure and hearing loss.

Please note that quality of life is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 127-6

It seems irresponsible given the housing crisis that this huge expansion would not include residential development. Why did the developer choose not to include housing? Why isn't he required to include any housing, especially affordable housing? Is there a possibility to add it to the plan for development? Doesn't the city have a responsibility to offer more housing to workers given the need?

Response to Comment No. 127-6

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment Letter No. 128

Dana Claudat
danaclaudat@yahoo.com

Comment No. 128-1

Following a review of the letter sent and due to the fact that I can't be present in person to any of the venues to view the complete draft EIR for the TVC 2050 Project I wanted to reach out to state my strong opposition based solely on what is in this letter that I believe represents only a fraction of the true environment [sic] impacts.

Response to Comment No. 128-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 128-2

This project will be developed essentially DIRECTLY across the street from me as I am nearly at the corner of Genesee Ave.

Response to Comment No. 128-2

This comment describing the commenter's location relative to the Project Site is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 128-3

I am so sensitive to VOCs that I can't even be exposed to "naturally formulated" house-paints. This would systematically and as stated, "unavoidably" destroy my health and the health of my animals and family.

Response to Comment No. 128-3

Refer to Section IV.A, Air Quality, and Appendix B of the Draft EIR for a comprehensive analysis of the Project's potential air quality impacts in accordance with CEQA. Table IV.A-12 in Section IV.A, Air Quality, of the Draft EIR presents the mitigated overlapping construction and operational regional emissions under the long-term buildout. This table compares the Project's emissions against the applicable SCAQMD regional significance thresholds. As discussed in Response to Comment No. 26-E.1-2, in response

to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project. The HRA utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children and seniors. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for the use of architectural coatings (VOC emissions) and increased truck trips associated with future operations, would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 128-4

In addition, it's already been insanely noisy and plagued with intense crime in this specific neighborhood. Added shaking ground and noise would make my daily work which must be done at home absolutely and completely impossible.

Response to Comment No. 128-4

Noise and vibration during both construction and operation are fully analyzed in Section IV.I, Noise, of the Draft EIR. Also refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR regarding police protection and the security measures that would be implemented by the Project.

Comment No. 128-5

I've already spoken to people who assured me this would be environmentally friendly and also wouldn't begin until 2024 at the soonest. I'm not sure if either thing I was told is the actual case at the moment.

Response to Comment No. 128-5

Page II-33 of Section II, Project Description, of the Draft EIR states that “[c]onstruction could begin as soon as 2023 and end as soon as 2026.” As of the publication of this Final EIR, the soonest construction could begin is 2024. Refer to Response to Comment No. 9-24 regarding the Project timeframe.

As discussed on page II-33 in Section II, Project Description, of the Draft EIR, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code), and pursuing U.S. Green Building Council's LEED Gold certification or equivalent green building standards.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 128-6

I will lead, if necessary, a large community movement against this project. I can not be forced out of my home or have my health and work decimated.

What does one do who is severely immunocompromised in this situation? What does one do who will be unable to lead their career, step foot out of the house, breathe the air or even walk in her own neighborhood?

Response to Comment No. 128-6

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 128-3 regarding air quality and the HRA.

Comment No. 128-7

I appreciate and look forward to your response.

Response to Comment No. 128-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 129

Meir Cohen
539 N. Harper Ave.
Los Angeles CA 90048-2222

Comment No. 129-1

As a resident of the Mid City West area, I am very concerned about the proposed increase in the size of the Television City studio. While the Environmental Impact Report is filled with the benefits of the project, homeowners like me have no idea what disruptions and hazards will occur in my neighborhood.

Response to Comment No. 129-1

The Draft EIR was completed in accordance with the requirements of CEQA and Section IV, Environmental Impact Analysis, contains a comprehensive analysis of the Project's environmental impacts during both construction and operation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 129-2

What does the construction period mean for my neighborhood? What kinds of disruptions to traffic will take place? On all streets surrounding the studio? More disruptions on some streets than on others? How the community supposed to keep track? What notifications will be sent out as to the disruptions, what they will be and when they will be scheduled? How far in advance will the area be told? Does it depend on what kind of disruption it is, such as a lane closure, or a sidewalk being torn up, or parking spaces being blocked?

What does the increase in studio space and employees mean for traffic? What days of the week will be-affected, and by how much traffic? What kind of traffic—cars, trucks, both? What will the expected traffic patterns be during construction? What about once the development is done?

The EIR doesn't tell me where the construction trucks are going to travel. Can trucks use any route? Will neighbors be consulted? Will churches and synagogues be consulted? Will schools be consulted? Two sisters walking home from school were killed recently in South Los Angeles by a dump truck.

This is a pedestrian heavy neighborhood with residents and students, and it should get easier to walk and bike, not harder. How will walkability in the neighborhood be affected? What about bicycling—how will the safety of bicyclists be ensured? What measures are going to be taken. It's not enough to be told that improvements may be made. What will those improvements be? And when will they be implemented? My concern is that construction and increased studio traffic will certainly increase traffic and create safety hazards for pedestrians and bicyclists.

The project developers owe it to the residents of and visitors to this area to designate a specific route for truck drivers to follow instead of them deciding their own path through the neighborhood. What will those routes be? Will truck traffic be limited to certain times of the day and days of the week? Will the truck routes be determined prior to the EIR being finalized and project possibly approved, not after? Because otherwise how are the public, city planners, and council members (who will be voting on the project) be fully informed, if these kinds of important pieces of information are not known beforehand?

Response to Comment No. 129-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 for information about the trips generated by construction.

The preferred construction schedule by the Applicant is a one-phase construction project that would take approximately 32 months to complete. That schedule as well as a long-term buildout schedule are the construction schedules studied in the Draft EIR and in Section 5D beginning on page 179 of the Transportation Assessment (Appendix M.1 of the Draft EIR).

The CTMP would include a notification system to allow the Project's construction manager to communicate with neighbors and businesses so that they know what is happening in the near-term horizon. The notification system will likely include emails and a website.

The Project construction plans do not anticipate any long-term travel lane or sidewalk closures. Sidewalks surrounding the Project Site would be improved as part of the Project, but while these improvements are made, alternate pedestrian paths would be provided.

Figure 21 on page 77 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the assignment of Project trips under full buildout of the Project through each of the 31 study intersections in the Study Area. Figure 22 on page 80 of the Transportation Assessment shows Project trips in and out of each of the Project driveways. These traffic assignments depict the traffic pattern information requested in the comment. Construction

workers would follow a similar pattern to the Figure 21 assignments. The traffic patterns shown in these figures reflect weekday conditions because these would be the busiest days of the week. A reduced activity would occur on weekends with no construction activity occurring on Sundays.

Refer to Response to Comment Nos. 107-2 and 124-6 regarding the haul routes and trips. The construction truck haul routes have been approved by LADOT.

Project trucks during the operation of the Project would come in and out of the Project Site throughout the day, but there is no intent to assign trucks through local residential streets. The NTMP could consider adding weight restrictions to residential streets within neighborhoods as a means to prohibit trucks from using these streets.

Pedestrian and bicycle considerations have been included in the transportation plan for the Project. Pedestrian connections would be enhanced with better sidewalks surrounding the Project and improved crosswalks on the corners of the Project and at the two new traffic signalized locations. Refer to Response to Comment Nos. 16-72 and 26-E.4-3 regarding pedestrian safety. Refer to Response to Comment No. 9-29 regarding hazards.

Comment No. 129-3

I would appreciate responses to all of my questions and concerns.

Response to Comment No. 129-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 129-2.

Comment Letter No. 130

Susan Collette
6357 Drexel Ave.
Los Angeles CA 90048-4703

Comment No. 130-1

I am writing this to express my dire concern about the proposed Television City project. Our community does not want this development, and even if it did, our infrastructure cannot handle the amount of traffic that this will produce both during construction and once it opens. The process of constructing this huge project and sheer volume of people who will need to commute to it will have devastating impacts to the Beverly Fairfax area.

Response to Comment No. 130-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 130-2 through 130-4.

Comment No. 130-2

The city has changed how it measures a project's traffic impacts and has not communicated how or why this change was made. Analysis of traffic impacts is challenging enough for a resident to understand. The EIR says that the average commute will be 3 miles but offers no data to back this claim up. How is that average derived?

Response to Comment No. 130-2

The change from LOS to VMT was done at the State of California level. Cities and counties in the State were mandated to adopt and implement this change. The origin of, and basis for, requiring transportation analyses in CEQA documents to be based on VMT is discussed on pages IV.K-4 through IV.K-6 in Section IV.K, Transportation, of the Draft EIR. SB 743 directed the Governor's Office of Planning and Research to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS (i.e., traffic congestion). Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. The rationale behind this change was that reducing the miles traveled by automobiles associated with new development would be more effective than continuing to widen

roadways to accommodate the additional travel demand. In addition, the theory behind VMT is that by locating jobs and residents closer to each other and closer to investments already made in transit systems, the overall travel needs (especially by single occupant automobiles) would decrease, which would, in turn, decrease congestion and air pollution. As discussed on pages IV.K-72 through IV.K-78 in Section IV.K, Transportation, of the Draft EIR, the Project's potential impacts related to VMT would be less than significant. The location of the Project Site meets the VMT reduction targets for this area of Los Angeles by creating jobs closer to residents, thereby reducing overall VMT. Refer to Topical Response No. 8, Vehicle Miles Traveled, for additional information regarding the VMT analysis.

The work VMT per employee, the metric used to measure VMT adherence, is not a simple measure of the distance from home to work so it is incorrect to convert a work VMT per employee of 6.7 to an average commute of 3.35 miles. The calculation of work VMT per employee takes into account the percentage of single occupant automobiles, carpool riders, transit riders, bicyclists, and walkers to calculate the resulting one-way VMT per employee. Refer to Topical Response No. 8 for an explanation and an example of the calculation of work VMT per employee and Response to Comment No. 26-156 regarding employee trip lengths.

Comment No. 130-3

And when was the analysis done? Because the past two and a half years have been a very different commute situation for many people. But things are going back to a pre-pandemic time as so many people are returning to work on-site. If the traffic analysis is not redone more recently, then it shouldn't be considered valid.

Response to Comment No. 130-3

The Transportation Assessment included as Appendix M.1 of the Draft EIR is based on pre-pandemic traffic levels, which were factored to represent current traffic levels assuming typical growth patterns in non-pandemic times. Since Los Angeles experienced almost two years of little or no traffic growth, the traffic volumes forecast for Year 2026 conditions in the Transportation Assessment represent conservative (i.e., high) estimates of future traffic levels and, therefore, are still valid. It should be noted that traffic count levels today in 2023 have still not reached the pre-pandemic 2019 levels. Thus, the transportation analysis does not need to be redone as incorrectly stated in this comment.

Comment No. 130-4

This project benefits no one but the developer. A million square feet of television studios with no affordable housing for the people who build and operate it is absurd.

Response to Comment No. 130-4

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment No. 130-5

This project creates an enormous traffic and environmental footprint with no tangible benefit for the community and I would ask that this project be rejected.

Response to Comment No. 130-5

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 130-2 through 130-4.

Comment Letter No. 131

Mercedes Connor
455 N. Orange Grove Ave.
Los Angeles, CA 90036-1718

Comment No. 131-1

I'm writing to comment on the draft EIR for the proposed project at the Television studios. I have lived here for over 15 years with my beautiful dog Sasha and son.

Response to Comment No. 131-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 131-2

What are they building? I've heard there will be new studios, new stages and a lot of offices. But then I heard about some kind of mobility hub, which sounds like a bus or transit station. So which is it—are they going to have studios and stages, or will it be an office building, or is it going to some kind of transit center? I heard there will be outdoor events too? So it is going to be concert venue? What else are they planning to do with the property?

What is going to be the effect in the surrounding neighborhoods of all those different things going onto the site? All this information needs to be made clear to residents and businesses. They are ones that will be affected by this project.

There are too many unknowns for those of us in the community to really understand and weigh in on this plan.

Will they be allowed to build anything taller than what is there now? What are the height requirements? Is there a limit to how big any of the buildings can be?

Response to Comment No. 131-2

The Project is the continuation and expansion of an existing studio use. Section II, Project Description, of the Draft EIR includes a detailed description of the uses proposed by the Project. Refer to Topical Response No. 3, Permitted On-Site Uses. The proposed Specific Plan would permit five land uses: sound stages, production support, production

offices, general offices, and retail. A concert venue is not proposed. Further, the proposed Specific Plan would limit general office and production office floor area to a maximum of 700,000 square feet each. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

As discussed in Section IV.K, Transportation, of the Draft EIR, the Project would include a Mobility Hub, which will serve shuttle buses and rideshare vehicles in an effort to encourage non-automobile travel to/from the Project Site. Topical Response No. 7, Mobility Hub, provides a detailed description of the components and the operation of the proposed Mobility Hub. It is not intended to be a public bus station but, rather, an integrated support facility for the Project, controlled by the Project and serving Project employees and visitors.

As part of the Specific Plan, height zones with specified height limits would be established to regulate building heights throughout the Project Site. Refer to the discussion of height zones in Section II, Project Description, of the Draft EIR, pages II-17 through II-20. As discussed therein, maximum heights would vary by zone, but the maximum height within the Project Site would be 225 feet. For comparison, the tallest building on the Project Site today is approximately 88 feet high. As discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 131-3

They need to narrow down what it is they are doing and then send the plan to go through the process again. When will that process happen? If the plan is updated with more detailed information, will you recirculate to the community?

Response to Comment No. 131-3

A detailed description of the Project is included on pages II-12 to II-35 of the Draft EIR, and the potential impacts are discussed throughout Section IV of the Draft EIR. In addition, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, with regard to review of the Specific Plan as it relates to the Draft EIR. As discussed therein, the Draft EIR disclosed all of the elements required by CEQA and comprehensively

analyzed the potential impacts of the Project. Thus, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 131-4

This is a massive project, and more information is needed.

Response to Comment No. 131-4

As noted above in Response to Comment No. 131-3, Section II, Project Description, of the Draft EIR includes a detailed discussion of the Project's proposed development program. The analysis in the Draft EIR was prepared in accordance with CEQA.

Comment Letter No. 132

Selena Cornish
1115 N. Flores St., Apt. 8
West Hollywood, CA 90069-2998

Comment No. 132-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 132-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 133

Rich Cox
919 N. Genesse [sic] Ave.
West Hollywood, CA 90046-7350

Comment No. 133-1

I am extremely concerned with the intentions behind the Television City project. I can completely understand the importance of adding new jobs and cultivating growth in the area. But does LA really have this much more room to grow?

Response to Comment No. 133-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 133-2 through 133-4.

Comment No. 133-2

Please consider the congestion that we as residents deal with on a daily basis. Now, imagine it with 8,000+ people. Think of the traffic, the parking, the congestion, and the noise that will consume and overwhelm the area.

Response to Comment No. 133-2

This comment provides a general statement about the condition of traffic, parking, and noise in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Section IV.K, Transportation, of the Draft EIR for an analysis of transportation impacts and Section IV.I, Noise, of the Draft EIR for an analysis of noise and vibration impacts. Refer also to Topical Response No. 13, Parking, and Topical Response No. 12, Safety and Congestion.

Comment No. 133-3

I'm not even fully convinced of the city's intentions with this project after trying to read through the EIR. It seems to me that that the developer's return on investment is a project objective. Why would this be the case? Please provide and circulate to the public the developer's proforma. Since the developer has included it as an objective, the financial information must be made available. If the city is prioritizing the developer's profitability, there must be something in return for the city. What is it?

Why would this be a project objective when there are countless other critical needs and people with great needs to consider? The City should care about the health and welfare of its residents.

Response to Comment No. 133-3

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. In addition, as discussed on pages II-10 to II-11 in Section II, Project Description, of the Draft EIR, there are 11 additional objectives for the Project, including optimizing the currently underutilized studio and maximizing studio production capabilities by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities, production office, and general office.

The City has fully disclosed impacts to human health and safety of its residents and the environment and the EIR has been prepared in accordance with CEQA.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 133-4

There are countless neighborhoods and families that will be directly affected by this project. By LA law, there will have to be 1.3 million homes built by 2029 to comply with the city's housing quota. There already is not nearly a sufficient number of homes and rentals in the area. The project adds to that needs thousands more people. Where will they go?

Response to Comment No. 133-4

Refer to Response to Comment No. 32-7 with regard to housing.

Comment Letter No. 134

Vicki Crawford
6553 Colgate Ave.
Los Angeles, CA 90048-4410

Comment No. 134-1

I am writing to you today to discuss the many issues with the EIR for the Television City Project. I used to work for Lt's make a deal, I know this site very well. Below I have listed some of the many concerns that my neighbors and I have:

Response to Comment No. 134-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 134-2 through 134-8.

Comment No. 134-2

1. The EIR states that there will be no impact on the historic district in the Beverly Fairfax neighborhood. That is just not true. What sidewalk closures during construction are being planned? Where will pedestrians be able to walk when sidewalks are closed? How long with closures be in effect?

Response to Comment No. 134-2

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant CEQA impact on the Beverly Fairfax Historic District.

In terms of sidewalk closures, the Project would provide new sidewalks and landscape parkway area improvements along the north, east, and west boundaries of the Project Site, which will necessitate the temporary closures of sidewalks while the new facilities are being constructed. Consistent with City policies, alternate pedestrian pathways would be provided, such that no pedestrian access along the Project frontage would be closed.

Comment No. 134-3

What about traffic that will wind its way through our historic district? How many cars are estimated to flow onto our neighborhood streets to the north of the project?

Response to Comment No. 134-3

The Transportation Assessment included as Appendix M.1 of the Draft EIR provides a full discussion of the potential impacts of cut-through trips on the north side of the Project Site in Chapter 5, Section 5C—Residential Street Cut-Through Analysis, including an estimate of the maximum number of vehicles that would potentially use the local streets. Refer to pages 167–173 of the Transportation Assessment.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant CEQA impact on the Beverly Fairfax Historic District.

Comment No. 134-4

What about parking? Did you do a study that looks at how many more cars are going to try and park in the streets within the historic district?

Response to Comment No. 134-4

Pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant CEQA impact on the Beverly Fairfax Historic District.

Comment No. 134-5

2. There is no Specific Plan to be found in the EIR. The Specific Plan is referenced, so what is that? When will the community see the Specific Plan? Does that have to get approved along with the project being approved? Why can a Specific Plan be mentioned but then the plan is not available to review? Nothing is concrete or specific. Why can't we know more about what is going on?

Response to Comment No. 134-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3. As discussed therein, all of the physical aspects of the Project that will be implemented by the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR in accordance with CEQA, and neither CEQA nor City policy requires a draft Specific Plan to be included in a Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR. Following the publication of this Final EIR, the Project approvals, including the proposed Specific Plan, among others, will be considered during several public hearings and meetings before City decision-makers prior to any approval.

Comment No. 134-6

3. One of the last and major concerns I have is the addition of almost 2 million square feet of development to an area that is already very urbanized. There are so many consequences of such an enormous build: that scale of development will bring an almost inconceivable number of people to the site, for all kinds of reasons such as for work, to visit, construction works.

Response to Comment No. 134-6

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to the number of employees, refer to pages 67 through 69 of the Initial Study included as Appendix A of the Draft EIR. As discussed therein, the Project is expected to generate approximately 5,702 net new employees.

Comment No. 134-7

Where are all those people going to go?—like actually get around, drive around and move around? The area is incredibly dense and busy now: what is the plan for the area to accommodate all those people? Not just parking with all those planned parking spaces. But actually commuting on our local streets from all over LA., walking to get lunch, running errands? Where is this examined, like the actual information that says this is what it's going to be like on a daily basis during construction? That says this is what it's going to be like on a daily basis once the development begins to be used?

Response to Comment No. 134-7

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 for information about the trips generated by construction.

With respect to operational traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer also to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 100-3 and 114-3.

Comment No. 134-8

These points are just a few of many concerns that my neighbors and I have about this project. A lot of work and communication with the community still needs to happen, and I implore you to take your time during this process.

Response to Comment No. 134-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 135

Fred Croci
527 N. Orlando Ave.
Los Angeles, CA 90048-2562

Comment No. 135-1

I live nearby to Television City and the proposed Television City 2050 project and frankly I am a little scared of what it is going to do to the area I live in.

Response to Comment No. 135-1

This introductory comment expressing concern about the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 135-2 through 135-5.

Comment No. 135-2

The construction for this project is going to bring so many trucks to the area and then once it is completed there will be many more people and cars than the area is used to. How many cars and trucks did your studies find will be coming to the area during each of the years of construction? And when is the community going to know if construction will be 3 years or up to the 20 years? We should know that before the project gets approved, because other wise are you going to tell the community “we’ll let you know down the road at some point?” What about all the additional cars during all the years when construction is done and the new development starts being used, how many then?

Response to Comment No. 135-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 for information about the trips generated during construction.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, for a discussion of the roadway operating conditions once the Project is complete and in full operation.

The Applicant would prefer to construct the Project in one phase, which would result in a construction sequence lasting approximately 32 months. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Topical Response No. 14, Construction Vehicle Impacts, details the construction activity during the 32-month construction schedule. As discussed therein, the estimated number of trips during three of the busiest subphases is as follows:

Excavation and Foundation:

- 640 truck trips per day
- 490 construction worker car trips per day

Foundation Pour (Five Days):

- 1,000 truck trips per day
- 100 construction worker car trips per day

Building Finishes:

- 60 truck trips per day
- 1,840 construction worker car trips per day

Table 13 on page 123 of the Transportation Assessment shows that the completed Project would generate a total of approximately 9,733 net new vehicle trips per day.

Comment No. 135-3

Most of us in the neighborhood have no idea what a Regional Center is, so please explain what that is, why it's being considered to be put here, and what that will mean for our community? What if we don't want a Regional Center here? Don't the residents and businesses here have a say in that? Does it mean the property will always be a Regional Center? Is that something that goes into the city general plan? If so, can it be taken out of the general plan?

Response to Comment No. 135-3

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

As discussed in Response to Comment Nos. 28-31 and 32-3, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project. Following the publication of this Final EIR, the Project approvals, including the proposed General Plan Amendment, among others, will be considered during several public hearings and meetings before City decision-makers prior to taking any action on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 135-4

One of the assumptions being made about traffic and parking is that many of the people coming to the site are going to use public transportation. However, public transportation is used only minimally in this area now and can only serve so many people. Are more bus routes going to be provided? Will more frequent buses be running? There is no metro stop close by, so why would people take that only to still have to get to the building. What are the reasons that the city believes that public transportation will solve the problems this project creates? Even if you have a place for ride share, that still means someone is driving. So what other public transportation options are there going to be?

Response to Comment No. 135-4

The analysis in the Transportation Assessment included as Appendix M.1 of the Draft EIR is based on the assumption that 15 percent of the employees to/from the Project Site will use transit or bike or walk into the Project Site. Refer to Topical Response No. 11, Transportation Demand Management, regarding the effectiveness of TDM programs.

The Project includes a major commitment to provide a direct shuttle bus service connecting the Project Site's Mobility Hub to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction. The shuttle bus program alone is projected to carry over 1,600 transit passengers per day to/from the Project Site which is greater than the 15-percent mode split assumed in the Transportation Assessment analysis.

Comment No. 135-5

I am wondering what is going to happen with all of the trucks that will be hauling away debris and waste from the construction site? How often will they be leaving the site to haul loads? What times of day and which days? What routes will these trucks be taking? Traffic gets backed up badly now on Fairfax, on Beverly and on West 3rd, so why do you

expect all those trucks won't make the situation even worse? How do we know they will they be kept out of our neighborhoods? What enforcement will be done to make sure that trucks are not idling in the area damaging the already bad air quality?

Response to Comment No. 135-5

As described in Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6, haul trucks associated with the Project would be limited to the use of one of three haul routes:

- Fairfax to I-10 to Irwindale
- Fairfax to San Vicente to La Brea to I-10 to Irwindale
- Beverly to La Brea to I-10 to Irwindale

Haul trucks on any other street would be subject to ticketing by LAPD.

Subject to approval by the Bureau of Engineering District Engineer, trucks would be allowed to operate from 7 A.M. to 4 P.M. on weekdays and from 8 A.M. to 4 P.M. on Saturdays.

The Project would stage all haul trucks on the Project Site itself. No offsite staging of haul trucks is proposed. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Air quality impacts, including those associated with construction trucks, are analyzed in Section IV.A, Air Quality, of the Draft EIR.

Comment No. 135-6

I hope that there are good answers to all these questions! This project really worries me, and I am sure it worries many of my neighbors as well!

Response to Comment No. 135-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 135-2 through 135-5.

Comment Letter No. 136

Anna Culp
130 N. Sweetzer Ave.
Los Angeles, CA 90048-3508

Comment No. 136-1

I live nearby the proposed site and am very concerned the proposed TVC project.

Response to Comment No. 136-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 136-2 through 136-5.

Comment No. 136-2

I am very concerned about the parking problems that will arise from the new development. The project has production facilities in the basement parking garage. The plans on the developer's website show all these production uses down in the garage. Exactly what are those uses? When will that area be used? How will the cars be able to get through those areas? This won't work. The analysis needs to show that cars and trucks will be 100% using only the gates on Beverly and on Grove Drive; where is the analysis that shows the breakdown of where cars will enter and exit to get to the parking? Please provide the additional analysis showing what will happen if cars and trucks cannot get to parking except through Beverly and Grove gates.

Response to Comment No. 136-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Figure 22 in the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the inbound and outbound vehicle flow at every driveway on the Project Site during both the morning and afternoon peak hours of the day.

Please note that no active production activities or uses would occur in the parking and basecamp areas below Project Grade. Refer to Figure II-4(e) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The Project does not intend to limit the Project Site access to only the Beverly Boulevard and The Grove Drive gates. Instead, three signalized driveways—one each on Fairfax Avenue, Beverly Boulevard, and The Grove Drive—will serve the majority of the inbound and outbound traffic flows to the Project Site. Inbound vehicles entering at any of these three gates would be able to access any of the on-site parking areas. As discussed on pages II-25 to II-26 in Section II, Project Description, of the Draft EIR, the Project would include a multi-level internal circulation system that provides efficient and safe access and circulation for both automobiles and trucks throughout the Project Site. Refer to Figure II-4 on page II-14 of the Draft EIR, which shows the Conceptual Site Plan, including the internal circulation system within the Project Site. Refer also to Response to Comment No. 35-23 and Topical Response No. 12, Safety and Congestion.

Comment No. 136-3

With almost all the parking located on Grove Drive, most if not virtually all the people trying to get to the site will use Grove Drive. That seems like it will be a disaster. Please describe to me what will happen if 50% or 75% of the traffic tries to use the Grove Gate? What about other access points?

Response to Comment No. 136-3

See Response to Comment No. 136-2. The comments that almost all the parking is located on The Grove Drive and most if not virtually all of the people trying to get to the Project Site will use The Grove Drive are incorrect. As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site.

Comment No. 136-4

Furthermore, if there is not enough parking on or around the site for workers, staff, and cast members and people attending shows and events, those people will park their cars on the streets in the neighborhoods or try to park in the parking lots of the businesses that line our streets. What assumptions were made when evaluating how much of a problem this will be? Where is that evaluation? This would create risks for kids playing nearby, for residents, and for customers of those businesses. What does the city plan to require of the developer to monitor that situation?

Response to Comment No. 136-4

The Project no longer proposes offsite parking. Refer to Section B, Off-Site Parking, of Topical Response No. 13, Parking, and Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Topical Response No. 13 also includes a discussion of the adequacy of the proposed on-site parking supply and spillover parking.

Comment No. 136-5

Please clearly communicate with us about how the parking issues in the proposed development that will impact neighborhoods and streets nearby.

Response to Comment No. 136-5

Refer to Response to Comment No. 136-2.

Comment Letter No. 137

Christina D.
123 N. La Jolla Ave.
Los Angeles, CA 90048-3527

Comment No. 137-1

One of the reasons I moved into the neighborhood 18 months ago was walking access to nearby attractions like the Farmers Market.

Response to Comment No. 137-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 137-2

This massive project will create massive traffic headaches and doesn't provide nearly enough parking—thousands of additional cars from audience and employees will swamp the community and undoubtedly park at the Farmers Market, displacing customers.

Losing the Farmers would be a major loss for the city. The Draft EIR should analyze the potential deterioration and loss of Farmers Market.

Response to Comment No. 137-2

Refer to Response to Comment No. 5-8 regarding the size of the Project and compatibility of the Project with surrounding uses.

Under SB 743, traffic congestion and the adequacy of a new development's parking supply are not CEQA considerations. A project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is not needed to meet the Project's peak parking

demands and an off-site parking agreement is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The commenter has provided no specifics or evidence regarding their claim about the “potential deterioration and loss of Farmers Market.” Accordingly, no response can be provided.

This comment also discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 138

Nadine Danziger
467 N. Gardner St.
Los Angeles, CA 90036-5708

Comment No. 138-1

I have lived in this community for more than 30 years and am so dismayed: These plans will severely impact our daily lives for the next two decades in ways that are both very unhealthy (air and water pollution) and stressful (tons of traffic, lack of parking, constant noise from the construction and then from the shows and concerts at the studio).

Response to Comment No. 138-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

All of the CEQA environmental issues were fully addressed in the Draft EIR. As summarized in Table I-1 in Section I, Executive Summary, of the Draft EIR, air quality impacts would be significant and unavoidable for construction and less than significant for operation, water quality impacts would be less than significant, noise impacts would be significant and unavoidable for construction and less than significant for operation, and transportation impacts would be less than significant. It should be noted that all of the Project's significant and unavoidable impacts would be temporary and cease when construction is complete. No significant and unavoidable operational impacts were identified.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is not needed to meet the Project's peak parking demands and an off-site parking agreement is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 138-2

If the City wants community support for a new project, it should be more transparent about the long-term impacts on the people who live here, and then show a range of the mitigating factors that would help people adjust and actually feel an improvement in their lives—not dread.

Response to Comment No. 138-2

Section IV, Environmental Impact Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts. Moreover, pursuant to Section 15097 of the CEQA Guidelines, Section IV, Mitigation Monitoring Program, of this Final EIR includes all mitigation measures and PDFs discussed in the Draft and Final EIR, along with details about implementation and enforcement.

Comment Letter No. 139

Katherine Darbreloff
541 Edinburgh Ave.
Los Angeles, CA 90048-2309

Comment No. 139-1

If this is really about maintaining studio uses, why is the project REDUCING studio production space? How can it have 250,000 square foot increase in sound stages and a 220,000 sf decrease in production support. And at the same time a 1.4 million square foot increase in office? Is this really just an office project masked as a studio project? Or are they just not counting all of the production support space? With a tripling of sound stages you would expect there to be 600,000 sf of production support not 100,000. That makes no sense. Something is wrong in the calculation of the production support. Either this isn't going to operate as a production studio, the production support will be offsite or they are hiding the production support. In any of those scenarios the Draft EIR is misleading as to what is the project and its impacts.

Response to Comment No. 139-1

Refer to Response to Comment Nos. 5-6 and 5-15 regarding the underlying purpose of the Project to maintain Television City as a studio. Television City has been a studio for over 70 years, and the proposed Specific Plan will ensure that the Project Site will continue to operate as a studio in the future. As discussed throughout all sections in the Draft EIR, the Project is a studio project that will include sound stage, production support, production office, general office, and retail uses. Refer to Response to Comment No. 26-16 regarding the ratio and size of the proposed studio uses.

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 regarding how the Draft EIR does not underestimate the size of the Project; how all of the proposed uses, areas, and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area; and how no active production activities would be located in the parking and basecamp areas below Project Grade.

Comment No. 139-2

I am very concerned, [sic]

Response to Comment No. 139-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 140

Tammy Davis
326 S. Mansfield Ave.
Los Angeles, CA 90036-3057

Comment No. 140-1

The community is outraged with the proposed development of the Television Studio Project. The EIR has left us with many concerns and questions.

Response to Comment No. 140-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 140-2

The construction industry faces a skilled labor shortage. As a result, this shortage causes an inflow of inexperienced workers. This could be an issue because it can increase the injuries and accidents on job sites. What skills will be required for the various construction activities that the project will entail? How are you planning on preventing accidents from taking place? What mechanism is set in place to address the issue of the workplace shortage? Will the project take longer because of a shortage of the skilled workers needed? If the project is using union labor, what happens if the workers go on strike? Will the project be delayed, causing the construction timeline to be delayed even more?

Response to Comment No. 140-2

This comment does not raise an environmental issue specific to CEQA, the Draft EIR, or the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 140-3

Any construction project inherently assumes a lot of financial risks. What financial plan is in place to avoid these risks? What amount of funds are set aside as a backup for mishaps that may occur during construction?

Response to Comment No. 140-3

This comment does not raise an environmental issue specific to CEQA, the Draft EIR, or the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 140-4

Large scale shut-downs, businesses shuttering, people working from home, and more conditions and effects of the covid pandemic all would affect any traffic study done during that time. How can you demonstrate that the traffic findings from a study done in October 2021 during the pandemic were not artificial rather than being based on usual, typical commuting and driving? Is the traffic study going to be redone during a more normal period?

Response to Comment No. 140-4

The Transportation Assessment for the Project (Appendix M.1 of the Draft EIR) is based on traffic counts taken before the pandemic. To be conservative, the historic traffic growth rate for the City was applied even to the COVID years when traffic levels did not grow because of the pandemic. Since the traffic growth in 2021 and 2022 did not reach the levels of typical pre-pandemic years, the 2026 traffic projections in the Transportation Assessment are conservative (i.e., high) and the analysis in the Transportation Assessment is valid. Thus, the transportation analysis does not need to be redone.

Comment No. 140-5

The increased traffic and congestion during years of construction are likely to impact local businesses. How are you going to address and remedy losses and disruptions experienced by impacted businesses?

Response to Comment No. 140-5

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 32-6 for information about the trips generated by construction.

The remainder of this comment discusses non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 140-6

Respectfully, we look to see these concerns be addressed.

Response to Comment No. 140-6

Refer to Response to Comment Nos. 140-1 through 140-5. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 141

Rocky Deangelis
132 N. La Jolla Ave.
Los Angeles, CA 90048-3528

Comment No. 141-1

One of the things I enjoy about living here is the neighborhood feeling—I have been here 20 years and have always felt comfortable.

Response to Comment No. 141-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 141-2

But I've looked at this project and don't think that it is good for our neighborhood—a truck road and studio buildings are being put right next to apartments. That will create health issues for the residents.

Response to Comment No. 141-2

As stated on pages IV.A-69 and IV.A-72 in section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 141-3

Also there is a school across the street—what about the parents and kids ability to walk to school and their safety?

Response to Comment No. 141-3

With regard to pedestrian safety, refer to Sections C, Traffic Safety vs. Congestion, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion. This comment does not concern the Draft EIR's analysis of the Project's potential environmental impacts, and no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 141-4

I would feel better if there was a health study of the noise and fumes on the residents of the apartments and the teachers and students.

Response to Comment No. 141-4

Refer to Response to Comment No. 26-138 for a discussion of noise exposure and hearing loss.

As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptor locations. The HRA was conducted following conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children. For detailed HRA modeling assumptions, refer to the Health Risk Assessment Protocol included as Appendix FEIR-10 of this Final EIR.

Comment Letter No. 142

Jewel M. Debah
6767 Drexel Ave.
Los Angeles, CA 90048-4210

Comment No. 142-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 142-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 142-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 142-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 142-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 142-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 142-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 142-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 142-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 142-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 142-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 142-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 142-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 142-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 143

Jan-Michael Del Mundo
521 1/2 N. Gardener St.
Los Angeles, CA 90036-5710

Comment No. 143-1

How can something called a draft “Environmental Impact Report” have favorably been issued for a project that envisions 60,000 diesel trucks idling and driving near a high school, Pan Park, a hospital, a recreation center, and fragile cultural and historic places? Why weren’t public transportation options better explored, like a metro station?

Response to Comment No. 143-1

Under CEQA, an EIR is an informational document intended to inform the public and decision-makers about the potential environmental impacts of a project and is not intended to make the case for or against any proposed development. Following the publication of this Final EIR, the finalized draft of the Specific Plan and the Project’s other requested entitlements will be considered during several public hearings and meetings before City decision-makers prior to any decision made on the Project. The public will have additional opportunities to comment on the Project at public hearings and meetings, including, but not limited to, City Planning Commission and City Council meetings, the dates of which will be provided to the public in accordance with the City’s noticing requirements.

All construction haul trucks would be staged on the Project Site, and, thus, off-site haul truck staging would not be required; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Per CARB-mandated limits, diesel-fueled commercial vehicles (delivery trucks) are not allowed to idle for more than 5 minutes at any given time, which would further limit diesel particulate emissions. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Page 181 of the Transportation Assessment (Appendix M.1 of the Draft EIR) explains the number of trucks anticipated during the excavation/foundation phase of construction—one of the busiest truck activity time periods. That peak day would see approximately 320 trucks enter the Project Site over the course of the entire day.

The location of a Metro station is a regional decision made by Metro and not by a single developer. While the Applicant does not have the authority to determine where Metro stations will be located, the Project takes advantage of the closest subway station by directly connecting the Metro D (Purple) Line Wilshire/Fairfax Station currently under

construction to the Project's Mobility Hub through a dedicated shuttle bus connection. The Project has also located its Mobility Hub to support an additional Metro station along the Metro K (Crenshaw) Line extension.

Comment No. 143-2

Why is the project planning to use natural gas? I thought that new buildings in Los Angeles are supposed to be fully electric to address global warming.

Response to Comment No. 143-2

Please refer to Response to Comment Nos. 26-51 and 45-1 regarding natural gas usage and the City's new all-electric buildings ordinance.

Comment No. 143-3

It seems like massive electric billboards will cover the entire exterior of the site. How much energy will these signs use? Was an analysis of energy from signs included in the EIR? What will be impact of night-light pollution on bird and bat species?

Response to Comment No. 143-3

Refer to Response to Comment Nos. 5-10 and 26-129 regarding signage. Also refer to Response to Comment Nos. 26-129 and 213-2 regarding off-site signs and billboards, which would not be permitted under the proposed Sign District.

Refer to Response to Comment No. 102-6 regarding energy usage for signage.

With regard to lighting impacts to wildlife associated with signage, the area surrounding the Project Site is fully developed and urbanized, and nighttime illumination is characteristic of most urban land uses, including the Project area. As discussed in Section I, Aesthetics, of the Initial Study (included in Appendix A of the Draft EIR), uses considered sensitive to nighttime lighting include, but are not limited to, natural (i.e., non-developed) areas. However, as discussed in Section IV, Biological Resources, of the Initial Study and in Response to Comment No. 26-E.1-68 above, the Project Site lacks habitat for special status species and is not located in or adjacent to a Biological Resource Area as defined by the City. Because wildlife species likely to occur on-site are those typically found in urbanized settings (i.e., small, common terrestrial and avian species), any lighted signage included in the Project would not adversely affect these species. Furthermore, the Project does not propose any billboards and illuminated signage would primarily be located within the Project Site interior. As discussed in Section I, Aesthetics, of the Initial Study included as Appendix A of the Draft EIR, illumination for Project signage would comply with the light

intensities set forth in LAMC Section 93.0117 and would be directed towards the signs to avoid creating off-site glare.

Comment No. 143-4

All of these compounded environmental impacts need to be considered.

Response to Comment No. 143-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 143-1 through 143-3.

Comment Letter No. 144

Daniel Delmrade
461 Vista St.
Los Angeles, CA 90036-5742

Comment No. 144-1

I am submitting comments about the plan for Television City. Though much of the information in the Draft Environmental Impact Report the city wrote is very technical and hard to understand, there are several concerns that stand out.

Response to Comment No. 144-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 144-2

The document clearly refers to the project construction having significant and unavoidable impacts related to NO_x emissions, even with mitigation! Furthermore, the report states that in the longer term buildout of the project, construction and operational activities will result in significant and unavoidable impacts from VOC and NO_x emissions. Nitrous oxides are the main source of air pollution, so it really does not matter [sic] their release is considered a temporary situation or not.

Response to Comment No. 144-2

The commenter correctly states the Draft EIR's finding that there is a significant and unavoidable impact for NO_x during construction and that there is a significant and unavoidable impact for VOC and NO_x during concurrent construction and operations. Refer to the discussion in Section VI, Other CEQA Considerations, of the Draft EIR as to why the Project is being proposed notwithstanding significant and unavoidable impacts.

Comment No. 144-3

The fact is the report finds that the project will result in significant and unavoidable impacts from these emissions. What are the significant and unavoidable impacts, please make clear? What will be the impacts to sensitive populations? To birds and animals? What about to plants and flowers?

Response to Comment No. 144-3

Section VI, Other CEQA Considerations, of the Draft EIR summarizes all significant unavoidable impacts associated with the Project. Specifically, implementation of the Project would result in significant impacts that cannot be feasibly mitigated impacts with respect to regional construction-related emissions of NO_x; on- and off-site noise during construction; and on- and off-site vibration during construction (based on the significance threshold for human annoyance). Cumulative impacts associated with regional construction-related NO_x emissions, on- and off-site noise during construction, and off-site vibration during construction (based on the significance threshold for human annoyance) would also be significant and unavoidable. In addition, both Project-level and cumulative impacts associated with emissions of NO_x and VOC would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations. Section VI, Other CEQA Considerations, of the Draft EIR also discusses the reasons why the Project is being proposed, notwithstanding those impacts. Pages 44 through 48 of the Initial Study, included as Appendix A of the Draft EIR, present the Project's impacts to biological resources, such as animals including birds and plants, which would be less than significant.

Comment No. 144-4

Why would the city, knowing that the project will worsen our air quality and cause adverse health impacts, consider permitting it? What is [sic] about this project that would justify putting at risk the public health, the health of the members of this community?

Response to Comment No. 144-4

Section VI, Other CEQA Considerations, of the Draft EIR summarizes all significant unavoidable impacts associated with the Project and discusses the reasons why the Project is being proposed, notwithstanding those impacts. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptor locations.

Comment No. 144-5

The only project alternative the plan considers as a true alternative is Alternative 5. That alternative states it reduce project level and cumulative significant and unavoidable construction-related NO_x impacts to a less-than-significant level with mitigation. However, even that alternative “would not avoid significant and unavoidable regional NO_x and VOX emissions associated with concurrent construction and operations...” Why wouldn't this alternative be seriously considered if it would at least be able to reduce NO_x impacts to a

less-than-significant level with mitigation? Just the fact that mitigation would be required to even get emissions to less than significant impacts should make it clear how impactful this project is. Under what basis can the city rationalize this kind of a project?

Response to Comment No. 144-5

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant impacts. As acknowledged by the commenter, Alternative 5 would reduce the Project-level and cumulative significant and unavoidable construction related regional air quality NO_x impacts to a less-than-significant level with mitigation by eliminating subterranean parking in order to reduce excavation and the export of soil. However, as discussed in Section V, Alternatives, of the Draft EIR, while Alternative 5 would generally meet the underlying purpose of the Project and five of its objectives, it would only partially meet or not meet seven of its objectives. As discussed in Topical Response No. 16, Project Alternatives Analysis, the Project alternatives analysis in Section V, Alternatives, of the Draft EIR fully complies with CEQA. Refer to Section VI, Other CEQA Considerations, of the Draft EIR for a discussion of why the Project is being proposed despite the temporary significant and unavoidable impacts during construction. Refer also to Response to Comment No. 53-2.

The commenter's preference for Alternative 5 is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. However, as stated on pages V-158 to V-160 in Section V, Alternatives, of the Draft EIR, Alternative 5, the Above-Ground Parking Alternative, would not fulfill the underlying purpose of the Project and meet the Project's objectives. Further, Alternative 5 would not eliminate all of the Project's significant and unavoidable impacts.

Comment Letter No. 145

Ryan and Laura DeNardo
109 S. Kilkea Dr.
Los Angeles, CA 90048-3525

Comment No. 145-1

We have lived here for 22 years and are horrified by these plans to totally change our community.

Response to Comment No. 145-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 145-2

Our quality of life is at stake—being able to safely walk along our streets is one of the things we like about living in our neighborhood—

Response to Comment No. 145-2

With regard to pedestrian safety, refer to Sections C, Traffic Safety vs. Congestion, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion. Note that quality of life is not an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 145-3

we are very concerned about parking (already tight) and traffic (already bad).

Where are all these people going to park? The EIR says more than 5,000 parking spaces are needed, but then says that the parking spaces may be offsite. Will they be in my neighborhood? If the parking is offsite, what are the air quality impacts, noise impacts, safety issues from people speeding in the community, pedestrian impacts, and other impacts of off-site parking? These impacts need to be analyzed.

Response to Comment No. 145-3

Under SB 743, traffic congestion and the adequacy of a new development's parking are not CEQA considerations. A project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is not needed to meet the Project's peak parking demands, and the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 145-4

And assuming that people are going to ride the bus and the subway seems like wishful thinking. We've lived here more than two decades and virtually everybody drives in their cars, all alone. Is there any actual evidence that people at this project are going to ride transit?

Response to Comment No. 145-4

Refer to Topical Response No. 11, Transportation Demand Management, regarding the effectiveness of TDM programs.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 146

Kathleen De-Nicola
368 N. Gardner St.
Los Angeles, CA 90036-5751

Comment No. 146-1

The draft EIR simply fails to give the public enough information about Television City's potential impacts to the city. My neighbors and I feel extremely worried and unheard during this time.

Response to Comment No. 146-1

The Draft EIR was completed in accordance with the requirements of CEQA and Section IV, Environmental Impact Analysis, contains a comprehensive analysis of the Project's environmental impacts during both construction and operation.

Comment No. 146-2

Yes, I understand we were provided with a conceptual plan. However, this plan gives no insight or quantitative data as to what the project's motivators are or how the project is going to benefit the city as a whole. Why is a conceptual plan being distributed? How does that allow residents to know what the actual development is going to be and what all the actual impacts will be? How are we expected to be in support of something that contradicts itself, changes standard City rules, excludes square footage from analysis and jumbles the analysis so that no one can actually understand what is attempting to say?

Response to Comment No. 146-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-16 for a discussion of how the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project; how all plans in an EIR are inherently conceptual; the purpose and function of a specific plan; and the regulatory process under the proposed Specific Plan. Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 5-7 with regard to the definition of floor area under the proposed Specific Plan and how all of the proposed uses, areas and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area. As demonstrated therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Please note that the comment regarding the benefit of the Project does not relate to the CEQA analysis. The Project does, however, include improvements to the public realm. Refer to page II-30 of Section II, Project Description, of the Draft EIR. Further, the general comments criticizing the Draft EIR's analysis are not supported by any evidence and are incorrect. Nevertheless, these comments are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 146-3

The EIR states that the developer can build whatever they want anywhere they want. What does this mean in terms of onsite construction and offsite construction? We deserve to know what exactly is going to be built and where. Presented is a set of an unlimited number of development options. None of which may actually be constructed. The community has no idea what is in store for this area and hence, no assessment of how this is going to affect their livelihood.

Response to Comment No. 146-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan and Topical Response No. 3, Permitted On-Site Uses, with regard to the permitted on-site land uses in the proposed Specific Plan. Refer also to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 9-12 regarding the proposed development program that was evaluated in the Draft EIR and the regulatory framework under the proposed Specific Plan. As demonstrated therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. The Project's potential impacts during construction were analyzed in Section IV of the Draft EIR. Note that no off-site construction is proposed other than that limited to utility connections within adjacent streets. As discussed in Topical Response No. 1, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 146-4

To top off that confusion, I read that a main objective of the project is the developer's return on investment. Please provide and circulate to the public the developers pro forma. The public deserves to know what is in return for the city. We need to know what the financials underlying this objective are. This information must be provided. Otherwise, residents do not feel that the city planners have the best interest of the citizens. The alternatives appear to be written by the developer. The city needs to be protecting the people of LA, rather than supporting a greedy real-estate developer.

Response to Comment No. 146-4

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project, and the information requested in this comment is not required to be provided. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective. Please note that the Draft EIR was prepared by the Los Angeles Department of City Planning, as Lead Agency, in accordance with CEQA and the CEQA Guidelines.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 146-5

Yes, the plan implies that for the regulations that will govern the project, but it does not include the draft specific plan. How many hundreds of variations of the project will there be? What will the impacts be? When will we be told?

Response to Comment No. 146-5

Refer to Response to Comment Nos. 146-2 and 146-3 regarding the Specific Plan. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, although CEQA and City policy do not require a draft Specific Plan to be included in the EIR, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR.

A summary of the Project's environmental impacts is included in Section I, Executive Summary, of the Draft EIR.

Comment No. 146-6

The EIR needs to be circulated to the community for further review.

Response to Comment No. 146-6

This comment concludes the letter and asserts that the Draft EIR needs to be recirculated. Specific issues raised by the commenter are addressed in Response to Comment Nos. 146-2 through 146-5. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. It is also noted that in response to community feedback and at the request of Councilman Paul Koretz's office, the Department of City Planning extended the comment period by 15 days, for a

total of 60 days concluding on September 13, 2022, which exceeds CEQA requirements. Refer to Response to Comment No. 32-3 regarding public outreach and noticing.

Comment Letter No. 147

Derek
368 N. Orlando Ave.
Los Angeles, CA 90048-2516

Comment No. 147-1

I'm concerned about the constant noise levels from operations. What prevents outdoor gatherings like concerts and dances with loud music from being right across from homes? Why is there a prohibition of outdoor studio production within 200 feet of the apartments? The EIR should have assumed loudest activities at property lines—noise obviously carries further than 200 feet.

Response to Comment No. 147-1

Noise impacts associated with Project operations are analyzed in Section IV.I, Noise, of the Draft EIR. As discussed therein, impacts would be less than significant. It should also be noted that a concert venue is not proposed. Refer also to Response to Comment No. 26-146 for additional discussion of outdoor production activity noise. As discussed therein, the Project would reduce the amount of outdoor production activity areas as compared to existing conditions. Also refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five studio uses that would be permitted within the Project Site.

Refer to Response to Comment No. 26-E.1-40 regarding amplified sound.

Project Design Feature NOI-PDF-5, which prohibits outdoor studio production within 200 feet of the Shared Eastern Property Line between 10 P.M. and 7 A.M., is an existing operational restriction on the Project Site that would be continued by the Project. Given that the Draft EIR concluded that operational noise impacts would be less than significant, additional measures are not required under CEQA.

Refer to Response to Comment No. 26-135 regarding the conservative assumptions used in the noise analysis.

Comment No. 147-2

And how about for the other sides of the site? How far away will outdoor studio production occur from the motel, residences and the park?

Response to Comment No. 147-2

The noise analysis in Section IV.I, Noise, of the Draft EIR analyzed noise impacts at eight nearby sensitive receptors (refer to Table IV.I-5) including the nearest residence (Receptor R1) adjacent to the Project Site, the nearest park (Receptor R2) at a distance of 75 feet from the Project Site, and the nearest motel (Receptor R3) at a distance of 95 feet from the Project Site. Distances are measured from the edge of the Project Site to the receptor. With regard to the locations of existing and proposed outdoor production activity areas, refer to Figures II-4(c) and II-3(d) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 147-3

How do we know that the EIR correctly calculated noise impacts—making movies and television shows with sound effects can be extremely loud. And because there is no set plan of development, noisy activities can happen anywhere. Will there be loud activities at any time of day or night?

Response to Comment No. 147-3

Section IV.I, Noise, of the Draft EIR includes a detailed methodology section explaining how the analysis was conducted. Refer to pages IV.I-32 and IV.I-33 of the Draft EIR; also refer to Response to Comment No. 26-135. The noise analysis conforms to the requirements of CEQA and the City. Also refer to Response to Comment Nos. 26-140, 26-135, and 26-E.1-44 regarding noise from outdoor production activities, including the existing and proposed locations of outdoor production activities.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Project that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan.

Comment Letter No. 148

Joanna Dewberry
2401 S. Sycamore Ave.
Los Angeles, CA 90016-2136

Comment No. 148-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 148-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 149

Erica Diamond
903 N. Genesee Ave.
West Hollywood, CA 90046-7319

Comment No. 149-1

I have been a resident of the area for many years. I love the city for its many opportunities, landmarks and entertainment. I have been proud to call this place my home.. Wil [sic] feel as if there is a disconnect with you (the city planners) and the LA community when it comes to the TVC 2050 plan.

Response to Comment No. 149-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 149-2

The impact of where and how that is done must be considered. In reality, it can take 20 minutes to travel a mile in LA rush hour traffic as is. The EIR does not provide any explanation for how the city is going to handle this volume of people in the neighborhood, nor does it address this as a concern. Where is the city addressing the many effects of an influx of all those cars and people into the community? And why isn't the city seeing this as a major concern?

Response to Comment No. 149-2

Under SB 743, traffic congestion is not a CEQA impact. A project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

This comment also discusses non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 149-3

The daily onslaught of construction trucks alone will cause major congestion on the roads even more. The EIR promised a detailed construction traffic management plan, but where is it? How long will it take to be released to the public? What will the plan cover? When the community be able to give input into that plan?

Response to Comment No. 149-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, and pages IV.K-36 and IV.K-37 in Section IV.K, Transportation, of the Draft EIR for a discussion of the CTMP (Project Design Feature TR-PDF-1), including the elements covered by the plan. The community was provided an opportunity to provide input into the CTMP as a part of the Draft EIR comment period. In addition, the public will have an opportunity to provide comments on the CTMP during the entitlement hearing process for this Project. The CTMP would be prepared as part of the regulatory building permit process and would be reviewed and approved by LADOT prior to Project construction.

Comment No. 149-4

I understand there will be a large amount of parking being added near our houses, not only for new employees but also people traveling to Television City for events. This is greatly increasing the amount of strangers my children will encounter in our community on a daily basis. How many cops are going to be available for this events? Will additional officers be available if something does happen? Is the city willing to take the extra steps to fund protection of our families? What is going to happen when ambulances, police cars, fire trucks and any other emergency vehicles need to get through to the site and there is absolutely no way for them to because of being stuck in traffic?

Response to Comment No. 149-4

With regard to parking, refer to Topical Response No. 13, Parking. Please note also that parking is not proposed outside of the Project Site and any on-site Project parking would not be open to the public. Off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

As discussed in Response to Comment No. 16-5, through Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, thereby reducing the demand for police services.

With regard to special events, refer to Topical Response No. 3, Permitted On-Site Uses, regarding how special events would continue to be governed by the LAMC,

consistent with existing conditions. As discussed on page IV.J.2-13 of the Draft EIR, the Applicant currently provides advance notice to and coordinates with LAPD regarding large special events that take place on the Project Site. As under existing conditions, on-site security and safety measures would continue to be implemented as part of future operations within the Project Site to reduce the demand for LAPD services, pursuant to Project Design Feature POL-PDF-2.

With regard to emergency access and response, refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-35, 26-147, and 35-134.

The question regarding City funding is outside the scope of this Project and EIR. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 150

Josh Diaz
Rachel Giron
437 N. Curson Ave.
Los Angeles, CA 90036-2353

Comment No. 150-1

I am a long-time resident of Beverly Fairfax, and I have recently seen the Draft Environmental Impact Report for the Television City project. Like many of my neighbors, I am left with several questions after reading through the DEIR and learning more about the project. Specifically, I fear that this project, and its potential 20-year construction period, might have devastating effects on my neighborhood. In order to fully form my opinion, I need answers to the questions outlined below.

Response to Comment No. 150-1

The Draft EIR was completed in accordance with the requirements of CEQA and Section IV, Environmental Impact Analysis, contains a comprehensive analysis of the Project's environmental impacts during both construction and operation. Refer to Response to Comment No. 150-3, below, for a discussion of the construction timeline.

Comment No. 150-2

- Why are mitigation measures only applied to the project's operational phase? Won't the project's construction have "more than significant" project level impacts? Is there a law that limits this rule to the operational phase of the project? If so, what is it? Please explain why mitigation measures only apply to the project's operational phase.

Response to Comment No. 150-2

The commenter is incorrect. The Draft EIR did not identify any significant impacts during operation and, as such, no mitigation measures were included. Mitigation measures are included only for the construction phase of the Project. Refer to Section I, Executive Summary, of the Draft EIR for a brief summary of the mitigation measures proposed as part of the Project, or the respective sections of the Draft EIR for a more detailed discussion of potential impacts and the effects of mitigation measures.

Comment No. 150-3

- How long does the city and the developer estimate the project's construction to last? The DEIR says it may take up to 20 years but that seems inflated? What studies was this estimate based on? The current estimate concerns me because 20 years of zero mitigation measures is unacceptable.

Response to Comment No. 150-3

Refer to Response to Comment No. 9-24 regarding the duration of construction activities. Additionally, the Project would not involve "20 years of zero mitigation measures" as incorrectly asserted by the commenter. As discussed on page I-29 through I-36 of Section I, Executive Summary, of the Draft EIR, the Project would include a number of mitigation measures and PDFs, all of which would be implemented through the Mitigation Monitoring Program, including during the construction period. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR.

Comment No. 150-4

- How is the city and the developer defining "significant impacts?" The claim the project would have a "less than significant" impact is misleading and does not represent the devastation this project could cause. Why is the developer allowed to misrepresent that impacts are not significant because they may occur "only" during certain phases of the project?

Response to Comment No. 150-4

Each section of the Draft EIR includes a detailed discussion of the thresholds of significance used in that analysis. The City's thresholds are based on Appendix G of the CEQA Guidelines. As an example, refer to pages IV.A-32 through IV.A-39 in Section IV.A, Air Quality, of the Draft EIR for a discussion of the thresholds of significance used in the air quality analysis. The analysis in the Draft EIR has been completed in full compliance with CEQA. Because the commenter did not provide any specific examples, no further response can be provided.

Comment No. 150-5

- Can you please elaborate on what criteria determines "consistency-with-other-plans?" Can you also please explain why this metric is the best for our neighborhood? Do all other development plans have potential construction periods that last 20 years? How does the scale of each project impact the "consistency-with-other-plans" metric? This project seems like it will be significantly larger than any other project in our neighborhood.

Response to Comment No. 150-5

CEQA requires that an EIR “discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” An “applicable” plan is a plan that has already been adopted and, thus, legally applies to a project; draft plans need not be evaluated. Refer to Topical Response No. 6, Wilshire Community Plan Update, for further details regarding the applicability of the respective plans.

The adoption of a General Plan, Community Plan, and any applicable specific plan is intended to provide coherent, long-term land use regulations applicable to properties within their respective boundaries. Over time, properties within these plans develop; redevelop; undergo alterations, demolitions, and changes of use, all over varying spans of time. As the Project involves the creation of the proposed Specific Plan, the Project Site will experience the same evolution expected in an urbanized area over the course of many decades, as has occurred with the Television City complex over the past 70 years.

In the Draft EIR, a total of 68 related projects have been identified within the vicinity of the Project Site. The size and scope of these projects vary, from small apartment buildings to projects similarly scaled to the Project. The related projects are listed in Table III-2 beginning on page III-9 of the Draft EIR, which identifies the location of each related project along with the types of land uses proposed. The locations of the related projects are shown in Figure III-1 on page III-15 of the Draft EIR. The analysis of cumulative construction impacts conservatively assumes concurrent construction with the Project and all related projects. As such, the specific construction timelines of each related project are not relevant.

Refer to pages IV.H-57 and IV.H-58 of Section IV.H, Land Use and Planning, of the Draft EIR regarding cumulative impacts related to potential conflicts with plans.

Refer to Response to Comment No. 11-3 regarding the size of the Project and its compatibility with the surrounding area.

Finally, refer to the Response to Comment No. 9-24 regarding the Project construction timeline.

Comment No. 150-6

Ultimately, I do not think it’s fair to use a one-size-fits-all approach with the mitigation measures created for this project. The scale of this project is significantly larger and therefore will have a much longer construction period proposed. The claim that this project is consistent with others or will have “less than significant” impacts is misleading and unfair

to our community. I hope the city and the developer will take the time to answer each of my above questions.

Response to Comment No. 150-6

The Project does not use a “one size fits all” approach to mitigation. While many of the mitigation measures are similar to those used in other Projects, they have been tailored for this Project. As an example, Mitigation Measure NOI-MM-1 requires sound barriers be installed at specific locations based on the location of sensitive receptors near the Project Site. Refer to Response to Comment No. 150-4 for a discussion of the significance thresholds used in the Draft EIR.

Comment Letter No. 151

Silvio Diaz
2714 Ivan Ct.
Los Angeles, CA 90039-2601

Comment No. 151-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 151-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 152

Karen Diehl
115 N. Doheny Dr., Apt. 307
Los Angeles, CA 90048-2829

Comment No. 152-1

The CBS TV Studio lot redevelopment plan, the TV2050 Project, will add more than one million square feet of commercial development that has ramifications not just the immediate community but the entire region. I believe the process should be halted while additional outreach and review is conducted covering a greatly expanded area. While this may not occur, my comments with regard to the DEIR are as follows.

Response to Comment No. 152-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 152-2

Traffic apocalypse. The unprecedented traffic increase that will be a direct result of the commercial development, office and studio uses, will not just clog nearby streets but have a ripple effect throughout the region. The typical traffic evaluation does not take this into account. Beverly and Fairfax are already challenged and adding such enormous amounts of new traffic to the area does not serve existing businesses, residents or the CBS TV studio. People will avoid the area when there are other options for shopping and dining as well as other studio options that are not as difficult to access. The nearby neighborhood streets are mostly narrow and barely accommodate the local resident traffic let alone what will inevitably be a dramatic rise in cut through traffic.

Response to Comment No. 152-2

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for

the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

With respect to neighborhood intrusion, the Transportation Assessment included as Appendix M.1 of the Draft EIR provides a residential street cut-through analysis as part of its non-CEQA transportation analysis. Refer to pages 167–173 of Appendix M.1 of the Draft EIR. Additionally, the Project calls for the development of an NTMP. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for more information.

Comment No. 152-3

Lack of housing. There are rare opportunities in Los Angeles to do in-fill housing, putting residents near business centers, shopping, dining, schools, etc. That this developer has not allowed for any housing on the site flies in the face of logic. Workers on entertainment projects commute from the far flung reaches of Los Angeles County or beyond where there are more affordable housing options. The developer could carve out a portion of the lot to add workforce housing to accommodate some of these workers, or teachers and public servants.

Response to Comment No. 152-3

The underlying purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Notwithstanding the Project's underlying purpose, Section V, Alternatives, of the Draft EIR included an analysis of a mixed-use alternative. Refer to pages V-91 through V-126 of the Draft EIR. Nevertheless, the commenter's suggestion that housing be included is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 152-4

Extraordinary increase in density. The developer seems to be requesting approval to add an enormous amount of new commercial and studio uses without providing an actual plan for the site. Everything is conceptual, or proposed. But when you evaluate the amount of development it is clear that it is not possible to add all of this on the site without overwhelming the community and the region.

Response to Comment No. 152-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, and 9-12 with regard to the accurate, stable, and finite Project Description that fully complies with CEQA and the conceptual nature of any plans within an EIR. Refer to Response to Comment Nos. 11-3 and 152-6 regarding the size of the Project and its compatibility with the surrounding area.

Comment No. 152-5

Not only is the CBS TV lot historic, so is the Original Farmers Market. It seems that the developer believes that building looming, massive developments encroaching on historic buildings is acceptable.

Response to Comment No. 152-5

The analysis in Section IV.B, Cultural Resources, of the Draft EIR and the Historic Report (Appendix C.1 of the Draft EIR) demonstrate that the Project would not result in any significant impacts to on- or off-site historical resources. Also refer to the entirety of Topical Response No. 5, Historical Resources, regarding the preservation of the Primary Studio Complex.

Regarding the comment about the size of the Project, refer to Response to Comment Nos. 5-13, 11-3 26-7, and 209-3. As stated throughout the Draft EIR, the proposed Specific Plan would permit a maximum of 1,874,000 square feet of floor area within the Project Site. The Project's proposed FAR of 1.75:1 is an approximately 17-percent increase from the 1.5:1 FAR currently permitted by existing zoning. Further, a 1.75:1 FAR is compatible with the surrounding neighborhood and is much smaller than the FAR permitted for surrounding properties. The permitted FAR for The Grove and The Original Farmers Market is 3:1 to 6:1 for individual parcels (1.5:1 FAR sitewide). Also refer to Response to Comment No. 110-3 for a discussion of the height of surrounding uses.

Comment No. 152-6

Community character/ancillary growth. Throughout all of the evolution and change in the Beverly/Fairfax area this is still a community with character, an eclectic mix of uses. This level of massive commercial development will forever alter the community and likely presage further dramatic change as other developers may seek to tear down existing, nearby buildings and provide offices for studio related businesses.

Response to Comment No. 152-6

Refer to Response to Comment No. 11-3 regarding the size of the Project and its compatibility with the surrounding area. As also demonstrated in the analysis provided on pages IV.H-39 through IV.H-57 of Section IV.H, Land Use and Planning, of the Draft EIR, the Project would not conflict with applicable land use plans and policies, including those that specifically address compatibility with surrounding land uses.

The comment provides the commenter's opinions about the Project, which are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 152-7

Regional center designation. Not enough consideration or review has been given to what changing this to a regional center means not just to the nearby neighbors but the region. I believe this is another reason that broader community outreach should be conducted. For instance, what does city of West Hollywood think about this proposal? It is folly to think that West Hollywood will not be impacted.

Response to Comment No. 152-7

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Response to Comment Nos. 28-13 and 32-3 regarding community outreach. As discussed therein, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project.

Comment No. 152-8

Public transportation. The developer doesn't seem to understand the workforce engaged in studio productions. The idea that these workers will be able to use public transportation to access the studio is a leap of faith. I would ask that existing studio operators be surveyed regarding the typical traffic in and out of their studio campuses. It is my understanding that the nature of the work, the long and ever-changing work schedules, make it next to impossible for these people to rely on public transportation. If they actually believe people will use their multimodal transit hub they wouldn't be proposing the enormous amount of parking.

Response to Comment No. 152-8

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As one of the largest operators of sound stages in the world, the Applicant understands the workforce of a studio campus. The comment is correct that the typical studio employee work schedule might make transit usage difficult, but the Project also includes up to 1.4 million square feet of office buildings where the employees will work on a much more regular schedule that is more conducive to transit travel.

Refer to Topical Response No. 11, Transportation Demand Management, regarding the effectiveness of TDM programs.

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 152-9

Parking. Is there below grade parking? If not, there should be as there are multiple opportunities to place parking below buildings that they might develop.

Response to Comment No. 152-9

The proposed development program includes below-grade parking. As discussed in Section II, Project Description, of the Draft EIR, parking may be provided in a combination of above-ground structures, subterranean structures, and/or surface spaces and may be designed to accommodate semi-automated or fully automated parking operations. Refer to the architectural plans for the Project which are publicly available on the Department of City Planning's website, which shows the proposed subterranean parking located in the west, north and southeast portions of the Project Site.

Comment No. 152-10

Lack of meaningful community outreach. The developer may have met the letter of the law in terms of outreach should have been greatly expanded. The typical radius drawn around a project that defines those who should be notified is woefully inadequate in this case. I live approximately two miles from the site. Beverly is my main street where I frequent local businesses and it serves as the thoroughfare connecting me to the greater Los Angeles area including downtown and Hollywood. I was shocked to learn just a few

weeks ago about the size of this proposed development and that the DEIR was completed and circulating.

This is a massive proposal that, if approved, will forever alter not just this corner of Los Angeles, but the region. There are regional impacts. I have a perception that this developer has attempted to stay under the radar, hiding under the “cover of COVID” in an attempt to bypass meaningful input and dialogue about this important development opportunity. Something should be done on the site, but the scope of what is being proposed is untenable.

Response to Comment No. 152-10

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment Letter No. 153

Steve Dixon
343 N. Sierra Bonita Ave.
Los Angeles, CA 0036-2452

Comment No. 153-1

Los Angeles needs more housing, of all kinds—apartment buildings (preferably not too high and dense), single family residences, condos and townhouses. Instead, this project is mostly office space, entertainment space, and warehouse space!

Response to Comment No. 153-1

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

The comment regarding housing needs in the City is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment No. 153-2

And it seems appalling that the community is being asked to deal with constant construction, traffic, diesel emissions, parking hassles, neon- bright signage and loud noise for a duration of 20 years. Why wasn't the public brought in a long time ago to give our opinions about this project?

Response to Comment No. 153-2

The construction of the Project Site is not expected to take 20 years. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Air quality and noise analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. With respect to the environmental impact of lighting, pursuant to Public Resources Code Section 21099, because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 38–40 of the Initial Study for a discussion of lighting. Also refer to Response to Comment No. 102-6.

With respect to parking during construction, the Project includes a CTMP pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 to IV.K-37 of the Draft EIR), which would include a prohibition of construction worker or equipment parking off-site.

Refer to Topical Response No. 13, Parking, regarding the adequacy of the Project's onsite parking supply.

With respect to public outreach, this Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeded the required 45-day Draft EIR public comment period. Following the publication of this Final EIR, a finalized draft of the Specific Plan and the Project's other requested entitlements will be considered during several public hearings before City decision-makers prior to any decision made on the Project. The public will have additional opportunities to comment on the Project at public hearings and meetings, including, but not limited to, City Planning Commission and City Council meetings, the dates of which will be provided to the public in accordance with the City's noticing requirements.

Comment Letter No. 154

Bosko Dobiic
315 N. Stanley Ave.
Los Angeles, CA 90036-2328

Comment No. 154-1

As a loyal community member for several years, I am bothered by the EIR that was sent out about the Television Studio Project.

Response to Comment No. 154-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 154-2 through 154-6.

Comment No. 154-2

The EIR appears to be vague in description, leaving out important information the community needs.

Response to Comment No. 154-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-12, and 9-13 for a discussion of how the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 154-3

Invoicing is a part of construction that ensures the finances are accurate. Occasionally, payments can fall behind and negatively impact a company's cashflow. This interruption can turn into a drywall and cause delays within the project. What financial system and plan do you have in place to ensure the financial team is working efficiently to prohibit construction delays? It would be heartbreaking for the finances to cause the construction time to be extended. We don't want to have a developer walk away from a project with no accountability.

"According to a study, 98% of construction projects come in over budget and 77% of them suffer significant delays." The EIR outlines many expectations and goals for the project. These goals appear to be unattainable within the set timeframe. With construction, there

are usually challenges that arise that nearly almost interfere with the work getting completed. What crisis plan is there to address issues that may arise during construction? What efforts are designed to make the community more comfortable when their respective area is disturbed?

Response to Comment No. 154-3

Refer to Response to Comment No. 9-24 regarding construction duration. Any extension of the Development Agreement beyond 20 years would require subsequent CEQA review and approval by the City.

As discussed on pages IV.K-36 and IV.K-37 in Section IV.K, Transportation, of the Draft EIR, in accordance with Project Design Feature TR-PDF-1, the Project will include a CTMP that will include a provision that the Applicant will designate a construction relations officer to serve as a liaison with the surrounding community and respond to any construction-related inquiries.

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 154-4

Construction is a reputation-based business, where people tend to work with those they know and trust. How are the thousands of workers and people taking part in this project being vetted before starting work? What system do you have to address delinquent workers? What about union workers? What happens if the workers go on strike?

Response to Comment No. 154-4

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 154-5

There is no information regarding what existing rules regarding the development and use of the property are changing. What is a Specific Plan? How does it differ from the current code requirements for the property? Please detail the differences.

Response to Comment No. 154-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Draft EIR disclosed all of the physical elements of the Project that would be implemented by the proposed Specific Plan. Refer to Response to Comment No. 26-22 regarding the relationship of the Specific Plan to the LAMC and the Draft EIR's CEQA analysis of the Project's consistency with the LAMC.

Comment No. 154-6

Those in the area should constantly be aware of what is occurring during construction. What means of communication will you take to ensure people who do not have access to technology, the disabled, the elderly, and community members and aware of what is taking place?

Response to Comment No. 154-6

The Project's CTMP prepared pursuant to Project Design Feature TR-PDF-1 requires that the Applicant designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Refer to pages IV.K-36 to IV.K-37 of Section IV.K of the Draft EIR.

Comment No. 154-7

These issues are important and deserve answers. The community should not be left in the dark, questioning the construction process, and is a success.

Response to Comment No. 154-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 154-2 through 154-6.

Comment Letter No. 155

Adam Dominic
351 N. Ogden Dr., Apt. 1
Los Angeles, CA 90036-2125

Comment No. 155-1

As a resident of a neighborhood near Television City, I feel that the large project to expand it will be problematic. The environmental review excludes some important information that we as citizens deserve to know since its building will impact our quality of life, not to mention safety.

Response to Comment No. 155-1

Refer to Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security. With regard to pedestrian safety, refer to Sections C, Traffic Safety vs. Congestion, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion.

The claim that the environmental review excludes important information is not supported by evidence. Further, quality of life is not an environmental impact specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Additional issues raised by the commenter are addressed in Response to Comment Nos. 155-2 through 155-4.

Comment No. 155-2

Both during construction and when the supposed studios are active, there will be many, many additional vehicles, workers, and audience members in this area. What does the increase in traffic mean in terms of parking? I understand that there will be 5,300 parking spaces on site but also some parking offsite. What does offsite parking mean for our streets in the neighborhood?

Response to Comment No. 155-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the onsite parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. In addition, the Project no longer proposes offsite parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the offsite parking agreement language was deleted from the Draft EIR.

Comment No. 155-3

What about pedestrian traffic? This is a huge walking community. What about the rights and safety of all the different pedestrians when the traffic increases significantly, with more drivers in the area trying to get through backed up intersections? It is already hard to cross at crosswalks now, to cross from one side of the street to another when it isn't at an intersection, but this will make traffic issues practically impossible. Has the city gone out to each intersection to measure traffic? And to measure traffic, at different times of the day, and different days of the week? Have you done pedestrian counts along all the major streets around the project area? What have those studies concluded? Or were estimates and actuarial data used, not real numbers? If not, why not?

Response to Comment No. 155-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The Transportation Assessment (Appendix M.1 of the Draft EIR) is based on actual traffic counts at the key intersections in the Study Area. These traffic counts were conducted during the morning and afternoon peak commute hours, which are when the streets are the busiest. The counts were conducted during pre-pandemic conditions with schools in full operation and each intersection count included pedestrian counts across all four corners of each intersection. Refer to Topical Response No. 10, Trip Generation.

The Project's Transportation Assessment included as Appendix M.1 of the Draft EIR provides an analysis of traffic safety as part of its non-CEQA transportation analysis. Refer to pages 141–150 therein. Refer also to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 for an additional discussion of safety and congestion and a discussion of pedestrian safety.

The Project intends to widen the sidewalks and improve the landscape parkways along the Fairfax and Beverly frontages of the Project Site to enhance the pedestrian

environment. The Grove Drive pedestrian crosswalk near the Holocaust Museum would be relocated slightly and incorporated into the proposed traffic signal at the Project entrance.

Comment No. 155-4

The plan for construction includes basecamps that will use power generators. Do these run on diesel fuel? This huge polluter of air and cause of increased noise is unacceptable. This project, if approved, should run completely on electric power, both during construction and when the expanded facility is in regular use. New buildings are supposed to run on electric, so this should qualify. What hours will power generators be used, 24/7? What if the generators break down?

Another source of air pollution will be the many trucks going to and coming from the site for years. It appears that there is not a defined truck route to the site. Please confirm that the trucks carrying construction debris will not be idling and lining up along our residential streets. I can't imagine the stress the additional noise, odors, and activity would cause everyone in this neighborhood. Does the Draft EIR analyze these impacts on the community? What were the conclusions of that analysis? And, does the whole community know what may happen if this project moves forward?

Response to Comment No. 155-4

The comment regarding basecamp power is similar to Comment No. 26-36. Refer to Response to Comment No. 26-36.

After the NOC/NOA was published and Draft EIR for the Project was publicly circulated, the City of Los Angeles passed Ordinance No. 187714, which requires all new buildings to be all-electric with a few exceptions. The City's all-electric buildings ordinance applies to any development where an application for a building permit is submitted after April 1, 2023. The Project would comply with the all-electric ordinance. Further, new PDFs have been added to Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the use of all electric off-road operational equipment and to provide electrical tie-ins at basecamps to remove the need for portable generators.

Project haul routes for both loaded and empty construction trucks and hours and days of operation are disclosed throughout the Draft EIR and in LADOT's approval letter dated June 30, 2022, available in Appendix M.5 of the Draft EIR. All haul truck staging would occur on-site, so no haul truck idling would occur off-site. Project Design Feature TR-PDF-1 requires a detailed CTMP to be developed to manage the flow of construction vehicles and minimize impacts to the community as detailed in pages IV.K-36 through IV.K-37 in Section IV.K, Transportation, of the Draft EIR. The Draft EIR comprehensively analyzed the Project's potential air quality impacts during construction, including impacts

from construction vehicles and associated idling, in Section IV.A, Air Quality, and Appendix B of the Draft EIR, in accordance with CEQA. Refer to Section IV.I, Noise, of the Draft EIR regarding the Project's potential noise impacts. Refer to pages 43 to 44 of the Initial Study (Appendix A of the Draft EIR) regarding the Project's less-than-significant impacts with respect to odor impacts.

The Draft EIR and this Final EIR constitute public disclosure for the Project and its environmental impacts as required under CEQA. Refer to Response to Comment No. 32-3 regarding public noticing.

Comment No. 155-5

People need to be kept informed in multiple ways so they can express their concerns before this project moves forward.

Response to Comment No. 155-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 155-2 through 155-4.

Comment Letter No. 156

Michael Douglas
mdendsis@gmail.com

Comment No. 156-1

I am concerned about crime in my neighborhood and the impact the TVC 2050 project will have on it. A couple months ago, someone was shot near where I lived. I could hear the gun shot from my home. That was unheard of ten years ago.

Now they want to bring thousands of new people here with their mobility hub. How will that impact the safety of our community? Will it attract and add to crime in our neighborhoods? Where has this been studied and projected? What is a mobility hub anyway?

Did the city consider and look at whether the project and hub will lead to an increase in the number of transient people, because it seems a center like this will be a place they could seek shelter? I really feel for our homeless and transient populations. Will the city provide a place to direct them so that police aren't being called to "move them along"?, because that would be terrible.

I am afraid this will be fuel on the fire for our crime problem. Does the EIR talk about new security or police presence to keep us safe? Can the city or developer estimate what kind of impact this development might have on safety in the immediate neighborhoods? If not, why is this not a city requirement? Isn't the developer required to mitigate impacts like increases in crime that the project brings?

Would the increased crime impact the likelihood of people taking public transit or using the mobility hub? How does the city or developer calculate the number of people who use public transit to commute to the site, and does it factor in safety at all?

I also know that they are going to be doing more tapings here, and that will attract large crowds of visitors. Won't that be a magnet for criminals looking for targets? Could that have a negative impact on our local retail and other neighborhood businesses? Where is the information from the city evaluating impacts to our small and family owned businesses? Safety needs to be considered in this project before it can move forward, and that the developer needs to explain how they will mitigate this impact on our community.

Response to Comment No. 156-1

With regard to the Mobility Hub and safety, refer to Topical Response No. 7, Mobility Hub. The Mobility Hub would not impact crime or safety. Refer to Section IV.J.2, Public

Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security. With regard to homelessness, refer to Response to Comment No. 16-8. With regard to special events, refer to Topical Response No. 3, Permitted On-Site Uses, regarding how special events would continue to be governed by the LAMC, consistent with existing conditions. With regard to audiences, as discussed in Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, audience members would represent a small fraction of the on-site population, with a weekday daytime average approximately 427 audience members. As such, the comment that the Project would include large crowds of visitors is incorrect. These audience members would park on-site, would enter the Project Site through a security gate and would be monitored by on-site security staff. As such, audiences would not be a source of crimes. With regard to the Project's use of public transit, as discussed in Section B, Transit and TDM Effectiveness, of Topical Response No. 11, Transportation Demand Management, the Project is anticipated to attract 15 percent of its employees and less of its visitors via transit, bike and walk modes. Given the Project Site's security features, the Project would not result in crime that would affect use of the Mobility Hub or public transit.

Regarding the comments about mitigation, the Draft EIR fully analyzed the Project's potential impacts on police services and concluded that impacts would be less than significant. Thus, mitigation is not required.

The comments regarding homeless and transient people and impacts on local businesses are not environmental issues specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 157

Thomas Drescher
443 N. Harper Ave.
Los Angeles, CA 90048-2220

Comment No. 157-1

I am very concerned about the development plan for the Television City location.

Response to Comment No. 157-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 157-2 through 157-4.

Comment No. 157-2

The plan talks about many dozens of large 18 wheeler trucks driving to and being on the site. Is there any analysis of the environmental impacts that so many 18 wheelers will have on the community? I worry that no consideration has been given to how these trucks will affect air quality and am very curious if this has been considered at all. If it has been examined, what did the city find out? Those findings should be shared with the public. How often will this particular kind of truck traffic be driving to the property, and from where? Will they park on the property? For how long?

Response to Comment No. 157-2

Air quality analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, of the Draft EIR. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. All other air quality impacts would be less than significant or less than significant with mitigation. Refer to Response to Comment No. 26-E.1-2 and the quantitative HRA included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips. Construction haul trucks will stage on-site (refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR), and the length of time spent on the Project Site will depend on the time it takes

to load the haul trucks and unload the delivery trucks. These are both expected to be relatively short time periods.

Comment No. 157-3

What about when they are exiting the property? They will have to turn into the huge amount of traffic on the streets that lie all around the perimeter of the property, so how will that be done?

There are no dedicated lanes to get cars and trucks on the street. If there were dedicated turn lanes where vehicles could turn onto the project the traffic and congestion would still be very bad—but without dedicated turn lanes, it's going to be a huge mess. This community will not be able to accommodate this type of additional consequences for the traffic situation in that vicinity. What is going to be done about this?

Response to Comment No. 157-3

Construction trucks entering or exiting the property making left turns may need the assistance of flag persons to complete their turn. Temporary traffic controls, including flagmen, are included as part of the CTMP to be prepared for the Project pursuant to Project Design Feature TR-PDF-1. Refer to pages IV.K-36 and IV.K-37 of the Draft EIR.

Refer to Response to Comment No. 83-1 regarding turn lanes. The Project frontage along Fairfax Avenue already has a wide right lane that can be used as a right-turn lane. The frontage along Beverly Boulevard has a parking lane that would serve as a de facto right-turn lane, allowing traffic to get out of the through lane to make their turn into the Project Site. Additional widening to provide separate right-turn lanes would encourage higher speed right-turns, which, in turn, would sacrifice the safety of pedestrians along the sidewalks.

Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Refer to Response to Comment No. 157-2 for a general discussion of construction traffic.

Comment No. 157-4

Additionally, having all the parking on Grove Drive makes no sense. Grove Drive is not able to accommodate that many cars. I feel like this process is rushed and the EIR has been rushed and all these details have not been fully thought through. What alternative routes or streets were considered?

What is the overall parking plan for the development? Aren't they required to have something like a parking management plan? Does it include the implications for the neighborhood?

Response to Comment No. 157-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project, prevent spillover parking, and access and use of The Grove Drive. The Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site.

Comment No. 157-5

Unless these measures are addressed I strongly oppose this project.

Response to Comment No. 157-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 157-2 through 157-4.

Comment Letter No. 158

Tom Drew
2714 Ivan Ct.
Los Angeles, CA 90039-2601

Comment No. 158-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 158-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 159

Helen Duffy
129 N. Detroit St.
Los Angeles, CA 90036-2915

Comment No. 159-1

I am a 38 year resident of this neighborhood with my cat Marlene. I have several issues and concerns with the proposed TVC 2050 Draft EIR as follows:

Response to Comment No. 159-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 159-2 through 159-5.

Comment No. 159-2

- I don't understand the square footage referenced in the Draft EIR and how that differs from the definition of square footage based on the LAMC. What is the true square footage? Why is it necessary to have a differing definition? It appears that it is advantageous to the developer to create a new definition in order to minimize the amount of square footage proposed on the project site. If the definition of square footage based on the LAMC was utilized, would that change any of the impact results? Please explain.

Response to Comment No. 159-2

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 5-7 with regard to the definition of floor area and how all of the proposed uses, areas, and activities have been accounted for in the impact analyses in the Draft EIR regardless of whether they meet the definition of floor area. As discussed in Topical Response No. 2, the Project's definition of floor area included in Section II, Project Description, of the Draft EIR and in the proposed Specific Plan is based on the LAMC definition, with a few additional clarifications to account for the unique nature of studio uses and functions, as was done in the Paramount Pictures Specific Plan (Ordinance No. 184,539), which is the most recent and direct precedent for this Project. As discussed in Response to Comment No. 16-21, the Project includes the creation of a specific plan, which is a land use ordinance enacted by the City Council superseding standard LAMC regulations. Citywide, specific plans and other overlays are used to prescribe land use and zoning regulations that differ from standard LAMC provisions.

Comment No. 159-3

- What is the actual project? The Draft EIR references a “conceptual project” but based on the land use exchange, it could be any combination of uses which could be located anywhere on the project site. Why was an unfeasible land use exchange scenario used in the Draft EIR in the Transportation Section where studios would not be built? Why would an entertainment studio not build studios? This is completely unrealistic. What was the purpose of doing this?

Response to Comment No. 159-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 5-6, 9-12, 9-13, and 9-14 with regard to the Project’s studio objective, the Conceptual Site Plan that was analyzed in the Draft EIR, the conceptual nature of all plans in an EIR, the Project’s limited Land Use Exchange Program, and the regulatory framework under the proposed Specific Plan.

With respect to the transportation analysis, the Draft EIR analyzes the maximum impact scenario (i.e., the development scenario under the limited land use exchange program that would generate the greatest environmental impact). Refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic, as applicable, in addition to the proposed development program as set forth in Table II-2 of Section II, Project Description, of the Draft EIR.

Comment No. 159-4

- The anticipated employees at the project site are projected to be around 8,000. Why wasn’t an alternative proposed that included affordable housing for its employees and other members of the community? There is housing available in Los Angeles, but it is not affordable.

Response to Comment No. 159-4

Section V, Alternatives, of the Draft EIR includes a range of reasonable alternatives to the proposed Project. Included among the alternatives analyzed is Alternative 4, the Mixed-Use Alternative, which includes 3,680 residential units, of which 14 percent (516 units) would be affordable units for Very Low-Income households. Refer to pages V-91 through V-126 of Section V, Alternatives, of the Draft EIR for more information on Alternative 4.

Refer also to Topical Response No. 16, Project Alternatives Analysis, for a discussion of alternatives suggested during public comment.

Comment No. 159-5

Many studio employees must drive long distances to secure jobs at studios. Providing affordable housing on-site would reduce vehicle miles traveled and improve the quality of life for such employees. Further, the vehicle miles traveled of 3.5 miles is woefully inadequate. As stated, many employees must travel long distances to secure jobs at studios. How did the project arrive at 3.5 vehicle miles traveled?

Response to Comment No. 159-5

The Draft EIR makes no claim that the average travel distance to the Project Site is only 3.5 miles. The commenter mistakenly assumed the 6.7 miles result of the work VMT per employee analysis to be a round-trip and approximated the one-way trip distance to be 3.5 miles; that analysis and conclusion are incorrect. Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156 and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. Please see Response to Comment No. 16-2 regarding housing.

Comment No. 159-6

I have [sic] you will thoughtfully consider my concerns and provide the information requested.

Response to Comment No. 159-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 159-2 through 158-5.

Comment Letter No. 160

Cassandra Duran
427 1/4 N. Sierra Bonita Ave.
Los Angeles, CA 90036-2460

Comment No. 160-1

I am deeply concerned about the environmental impact of this project—LA air is already dirty but this project puts a truck road and studio buildings right next to apartments, schools, health clinics and retirement homes where vulnerable people live. Please show a health study.

Response to Comment No. 160-1

This comment is similar to Comment No. 141-2. Refer to Response to Comment No. 141-2. In addition, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 160-2

And what about noise levels for these residents, students, and patients—it's pretty clear that constant noise is exhausting for the human body.

Response to Comment No. 160-2

Refer to Response to Comment No. 26-138 for a discussion of noise exposure and hearing loss.

Comment No. 160-3

My other concerns is that this project has no housing. When people live in a neighborhood, they invest in the community and take care of it—our community doesn't need more office space and daily commuters; we are in desperate need of all kinds of housing. Please show an alternative with housing as part of this project.

Response to Comment No. 160-3

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Refer to Response to Comment No. 159-4 regarding the analysis of Alternative 4, which is a mixed-use alternative with an affordable housing component.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 161

Dylan
634 N. Orlando Ave.
West Hollywood, CA 90048-2112

Comment No. 161-1

I am writing to express my concerns regarding the proposal for the TV City expansion. I am concerned about the lack of specifics contained within the plan, particularly when it comes to noise during the construction phase and after the construction is complete.

Response to Comment No. 161-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 161-2 and 161-3.

Comment No. 161-2

Construction obviously produces all types of noise: noise from the trucks driving in and out of and on the construction site, from the construction equipment itself, and from the construction activities. What kinds of construction trucks and equipment will be entering the property? What times of day will there be construction activities and which days of the week? Are there certain days and times of the day that we will not have to deal with construction vehicles driving into and out of the area? What permits do these vehicles need, and are they different for the different kinds of equipment? It doesn't seem there has been any acknowledgement of how all this noise and hours of construction will impact residents.

Where is the information about what kinds of noise, from what sources, and which streets and neighbors are going to be impacted the most and the least? Please don't just tell me where to find the information, as I can't make my way through some long and complicated report. Please respond to those questions above when you respond to this letter. And I want to know how this information was derived—what are the thresholds for noise pollution? Who decides what those thresholds are?

Response to Comment No. 161-2

Refer to Response to Comment No. 26-E.1-48 for a discussion of noise impacts from construction truck trips. The construction schedule is included on pdf page 30 in

Appendix B of the Draft EIR and is also discussed further in Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR. The types of construction equipment and vehicles used for each phase of construction are provided in pdf pages 52–57 of Appendix J of the Draft EIR and summarized in Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR. All equipment and vehicles will be operated in accordance with applicable regulatory requirements. Note that haul routes have been analyzed in the Draft EIR and approved by LADOT. Refer to pages II-34 and II-35 of the Draft EIR, Appendix B of the Draft EIR and Topical Response No. 14, Construction Vehicle Impacts, for a detailed description of the haul routes and the number and type of construction trucks during each phase of construction.

Construction hours are provided in Section II, Project Description, of the Draft EIR. As stated on pages II-33 and II-34 therein, “[i]n accordance with Los Angeles Municipal Code (LAMC) requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays, or outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners.... Hauling activities are anticipated to occur between the hours of 7:00 A.M. and 4:00 P.M. with approval from the Bureau of Engineering District Engineer as well as between 8:00 A.M. and 4:00 P.M. on Saturdays.”

The noise assumptions for each piece of construction equipment are provided in Table IV.I-9 of Section IV.I, Noise, of the Draft EIR, and the resulting noise levels at each receptor location are provided in Table IV.I-10 of the Draft EIR. Noise levels with mitigation measures included are provided in Table IV.I-19 of the Draft EIR. Off-site vehicle noise levels are provided in Table IV.I-16 (Future Plus Project) and Table IV.I-17 of the Draft EIR.

Thresholds of significance for the noise analysis were determined by the Department of City Planning and are discussed on pages IV.I-29 through IV.I-31 of Section IV.I, Noise, of the Draft EIR. As stated therein, the CEQA Appendix G thresholds are relied upon for the analysis, with specific criteria established by the 2006 L.A. CEQA Thresholds Guide.

Comment No. 161-3

How was it determined when construction can occur? Are all of the other activities that are happening in the area at the same time taken into account when any analysis of noise levels was done—noise from daily commuting, weekends when more shoppers and visitors may visit the area?

Response to Comment No. 161-3

Construction hours are established by LAMC Section 41.40.

Construction would occur in accordance with the hours permitted by the LAMC. Refer to Response to Comment No. 161-2. The noise analysis included in Section IV.I, Noise, of the Draft EIR is based on the increase in noise over ambient conditions. Refer to Response to Comment Nos. 26-E.1-5 and 26-E.1-43 for a discussion of the City's noise measurement standards and ambient noise levels.

Comment No. 161-4

The community needs specifics about what the plan is and what the impacts will be. People who live here need clarity and to know exactly how they will be impacted. Telling residents that there will be no impacts is just true. Thank you for responding to these questions and concerns.

Response to Comment No. 161-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 161-2 and 161-3. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

The Project's impacts are summarized in Table I-1 of Section I, Executive Summary, of the Draft EIR.

Comment Letter No. 162

Tommy Edery
106 N. Fuller Ave.
Los Angeles, CA 90036-2812

Comment No. 162-1

As a lifetime LA. resident, I have spent my fair share of time over by Beverly Blvd. and Fairfax Ave.

Response to Comment No. 162-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 162-2

Driving on these streets, it is not uncommon to see regular car crashes, some quite severe. These crashes have become so problematic that the Los Angeles Department of Traffic went so far as to identify these streets as “High Injury Network” streets. This means that these streets have a higher incidence of “severe and fatal collisions” than the average street in LA.. [sic] Now you want to build a huge development right on these streets, which will only lead to more traffic and potential collisions? How can that be justified? How can a development of that scale and scope be approved for that intersection, given the HIN? What is going to be done to ensure all of the construction from the development does not make these streets even more dangerous than they already are? Why not build somewhere where the streets are safer and drivers are less likely to get into accidents? Before I support this project, I want to know how the city is going to make this project and these streets safer.

Response to Comment No. 162-2

Refer to pages 74-75 of the Project’s Initial Study included as Appendix A of the Draft EIR; pages 124–128 and 141–150 of the Project’s Transportation Assessment included as Appendix M.1 of the Draft EIR; and Topical Response No. 12, Safety and Congestion, for a discussion of traffic safety in the vicinity of the Project. The Transportation Assessment for the Project acknowledges that the Project Site is located on roadways that are part of the High Injury Network in the City. The Project’s Transportation Improvement Program, summarized in Table 23 of the Transportation Assessment, includes improvements aimed at traffic safety along the HIN corridors, including Vision Zero and Transportation System Management improvements, that will improve both pedestrian

and vehicular safety. In addition, refer to Topical Response No. 12, Safety and Congestion, regarding measures that have been included in the Project's transportation improvement program in the form of TDM strategies and traffic signal and operational improvements along the HIN corridors that would advance the traffic safety goals of the City's Vision Zero Program and would include LOS benefits. Refer also to Topical Response No. 11, Transportation Demand Management.

Regarding the scale and scope of the Project and compatibility of the Project with surrounding uses, refer to Response to Comment Nos. 5-8 and 11-3.

Appendix M.1, Transportation Assessment, of the Draft EIR includes a complete Project construction assessment (refer to Section 5D, pages 179 through 184). As discussed therein, while construction-related activities associated with the Project would result in varying levels of truck and worker trips to and from the Project Site on a daily basis, such trips would be far less than operational Project-related trips. Additionally, the Project includes a CTMP pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 to IV.K-37 of the Draft EIR), which would include provisions to limit the amount of construction-related trips during peak hours to the extent feasible, as well as a prohibition of construction worker or equipment parking offsite. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Comment No. 162-3

Also, let's not ignore the fact that these streets are filled with traffic. Not only will the construction make this worse but the draft report says rideshares such as Ubers and Lyfts will be picking people up and dropping them off along Beverly Blvd and Fairfax Ave. Where will that take place? Will they pull over right along these extremely busy streets? How many stops will there be and located where? It is simply insane to me that the city thinks this is acceptable. Traffic is already bad enough on these roads and the construction will make it worse and now you want to add people getting in and out of cars? It takes people a few minutes to find their driver. They have to look at the license plate, ask them who the car is for, and then actually get into the car. This is going to make traffic on these streets worse than it already is. Frankly, I will not be spending time over in the Beverly Fairfax area if this is a case.

Response to Comment No. 162-3

The bulk of the rideshare pick-up and drop off will take place in the Mobility Hub, which is planned as an off-street facility near Fairfax Avenue and 1st Street. For more information on the location and operations of the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Additional rideshare areas will be provided on-site near the Genesee

gate and near the southeast parking structure. These off-street rideshare areas have been designed and integrated into the Project Site to minimize effects on traffic driving past the Project.

Comment No. 162-4

I believe the city has some serious concerns to take into account when it comes to this project and I hope they do so before moving forward with something that will ruin this neighborhood in Los Angeles.

Response to Comment No. 162-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 162-2 and 162-3.

Comment Letter No. 163

Edward P. Edward
25 S. Oak Knoll Ave., Apt. 331
Pasadena, CA 91101-2169

Comment No. 163-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 163-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 164

Bob Eisele
359 S. Citrus Ave.
Los Angeles, CA 90036-3035

Comment No. 164-1

I am writing to express my concerns about many aspects of this proposed plan for Television City. These concerns demand major reconsideration of this project.

Response to Comment No. 164-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 164-2 through 164-4.

Comment No. 164-2

To start, what is the route that trucks will take while traveling to the project site and then when moving away demolition, debris and dirt from the project site? Why have routes not been confirmed? Will the routes vary depending upon the day and time of day? What if an accident shuts down one of the routes or causes a long delay? Will the trucks take different detours then? I think that this is crucial and it must be clarified.

Response to Comment No. 164-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 9-22, 107-2, and 124-6 regarding construction haul routes and construction traffic impacts. As discussed therein, three routes were selected to comprehensively analyze the potential haul routes and ensure all associated environmental impacts were evaluated in the Draft EIR.

Comment No. 164-3

How much demolition debris and dirt is expected, on a weekly basis? What are previous studies on environmental impacts of debris and dirt on nearby properties? What about studies on the health impacts of debris and dirt on nearby residents? Why are there different options for the trucks? How is it determined which trucks get which options? Are these trucks going to line up and be idling outside of my house choking me and my children with exhaust? Even if you do clarify the truck routes, how are they going to be enforced? Will it be the local authorities, or are you hiring people to do it? Please answer the

questions above in enough detail for anyone to have a clear understanding of your plan and potential impacts in might have on our environment, and more importantly, health.

Response to Comment No. 164-3

The Draft EIR provides the number of truck trips that would be required for and associated with the demolition of 495,860 square feet of buildings and export of 772,000 cubic yards of export. As shown on pdf page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, approximately 80 daily truck trips over 65 working days were evaluated for demolition and approximately 640 daily truck trips over 185 working days were evaluated for potential excavation/export impacts. All haul truck staging would occur onsite per LADOT's haul route approval letter dated June 30, 2022. Project haul routes for both loaded and empty construction trucks and hours/days of operation are also disclosed in LADOT's approval letter, available in Appendix M.5 of the Draft EIR. Project Design Feature TR-PDF-1 requires a detailed CTMP to be developed to manage the flow of construction vehicles and minimize impacts to the community as detailed on pages IV.K-36 through IV.K-37 in Section IV.K, Transportation, of the Draft EIR. Moreover, idling would be restricted to no more than 5 minutes at any given time consistent with CARB airborne toxic control measure (ATCM) requirements. Pursuant to CEQA, a Mitigation Monitoring Program would be implemented, including reporting and/or monitoring and enforcement procedures, to support the implementation of the Project's environmental commitments as detailed in this Final EIR; refer to Section IV, Mitigation Monitoring Program.

A quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The health risk assessment demonstrates that construction risk estimates and incremental operational risk estimates at the points of maximum impact (PMIs), even after accounting for increased truck traffic associated with future operations, would be below SCAQMD's risk thresholds, further affirming the statements on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of toxic air contaminants would result in a less-than-significant impact.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 for a discussion of the overall construction schedule, the estimate of the construction trip generation, construction traffic safety, haul routes, and the CTMP. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD.

The Project Site is large enough that all haul truck staging will occur on-site, thus no idling outside of the Project Site would occur. There are no plans for long-term closures of travel lanes along the streets adjacent to the Project Site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Per CARB-mandated limits, diesel-fueled

commercial vehicles (delivery trucks) are not allowed to idle for more than 5 minutes at any given time, which would further limit diesel particulate emissions.

Comment No. 164-4

Similarly, what are the working hours and under what timeline is this project going to take place? I'd imagine that with demolition debris and dirt, there must be loud things that are going to occur. How will this noise not going to [sic] make it unbearable to live in the neighborhood? Can you assure the neighborhood of that? Specifically, how loud do you expect these actions to be? Will anything take place during the nighttime, making it harder for me to put my children to bed? Are we going to be woken up early in the morning with the sound of loud explosions?

Response to Comment No. 164-4

Refer to Response to Comment No. 161-2 for a discussion of permitted construction hours, including hours for hauling. Construction hours would occur within daytime hours with the exception of nighttime activities necessary for mat pour activities that would occur for a maximum of five days.

Anticipated noise levels during both construction and operation of the Project are fully analyzed in Section IV.I, Noise, of the Draft EIR. Refer to Table IV.I-19 of the Draft EIR regarding construction noise levels from on-site construction activities and Table IV.I-11 of the Draft EIR regarding noise levels from hauling activities. No explosions would occur during construction activities.

Comment No. 164-5

I feel entitled to a thorough response to all of the above. These are questions that directly relate to the quality of life of Beverly Fairfax residents, and it is important to consider that! Please answer the above and include any additional detail that you think is important for us to have a better understanding.

Response to Comment No. 164-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 164-2 through 164-4.

Comment Letter No. 165

Diana Elizalde
7100 Hillside Ave., Apt. 102
Los Angeles, CA 90046-2339

Comment No. 165-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 165-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 166

Jeremy Elkaim
413 N. Ogden Dr.
Los Angeles, CA 90036-1710

Comment No. 166-1

I am very concerned about the development plan for the Television City location. I am concerned about the increase in traffic. I am [sic] heard that this could take 20 years or more with the construction of this development. Also, the amount of 18 wheel trucks and the cueing in our area.

The plan talks about many dozens of large 18 wheeler trucks driving to and being on the site. Is there any analysis of the environmental impacts that so many 18 wheelers will have on the community? I worry that no consideration has been given to how these trucks will affect air quality and am very curious if this has been considered at all. If it has been examined, what did the city find out? Those findings should be shared with the public. How often will this particular kind of truck traffic be driving to the property, and from where? Will they park on the property? For how long?

Response to Comment No. 166-1

Refer to Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR) for a discussion of the effects of adding Project vehicles to the street system serving the area. The addition of Project vehicles does not cause any of the 31 study intersections to change from an LOS D or better to an LOS E or F condition. A detailed discussion of truck and auto trips during construction may be found in Topical Response No. 14, Construction Vehicle Impacts. The preferred construction program would build the entire Project in one phase which would complete the construction in a 32-month time period.

This second paragraph of this comment is identical to Comment No. 157-2. Refer to Response to Comment No. 157-2, above.

Comment No. 166-2

What about when they are exiting the property? They will have to turn into the huge amount of traffic on the streets that lie all around the perimeter of the property, so how will that be done?

There are no dedicated lanes to get cars and trucks on the street. If there were dedicated turn lanes where vehicles could turn onto the project the traffic and congestion would still be very bad—but without dedicated turn lanes, it's going to be a huge mess. This community will not be able to accommodate this type of additional consequences for the traffic situation in that vicinity. What is going to be done about this?

Response to Comment No. 166-2

This comment is identical to Comment No. 157-3. Refer to Response to Comment No. 157-3, above.

Comment No. 166-3

Additionally, having all the parking on Grove Drive makes no sense. Grove Drive is not able to accommodate that many cars. I feel like this process is rushed and the EIR has been rushed and all these details have not been fully thought through. What alternative routes or streets were considered?

What is the overall parking plan for the development? Aren't they required to have something like a parking management plan? Does it include the implications for the neighborhood?

Response to Comment No. 166-3

This comment is identical to Comment No. 157-4. Refer to Response to Comment No. 157-4, above.

Comment No. 166-4

Unless these measures are addressed I strongly oppose this project.

Response to Comment No. 166-4

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 166-1 through 166-3.

Comment Letter No. 167

Holly Fader

Comment No. 167-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 167-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 167-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 167-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 167-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut-through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 167-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 167-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 167-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 167-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 167-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 167-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20 years which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 167-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 167-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 167-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 168

Nina Fales

Comment No. 168-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 168-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 168-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 168-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 168-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut-through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 168-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 168-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 168-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 168-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 168-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 168-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20 years which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 168-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 168-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 168-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 169

Rainbow Fang
1211 Graynold Ave.
Glendale, CA 91202-2020

Comment No. 169-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 169-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 170

Julia Farman
128 N. La Jolla Ave.
Los Angeles, CA 90048-3528

Comment No. 170-1

I don't like anything about this project, starting with what it's going to look like and where are the buildings going to be actually located!

Response to Comment No. 170-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 170-2.

Comment No. 170-2

The height maps allow buildings up to 20 stories (225 feet) in some areas and 15 stories in other areas (160 feet).

But it is not clear where any of these buildings will be actually built and how big they will be. Our community has no idea of what will actually be built and has no way to evaluate the impacts of the project—we don't want this in our neighborhood!

Please provide clarity as to what will be built and where.

Response to Comment No. 170-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. See also Topical Response No. 3, Permitted On-Site Uses, with regard to the land uses that would be permitted in the proposed Specific Plan Ordinance. Regarding the height of the Project, refer to Response to Comment Nos. 11-3 and 26-7. Lastly, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 171

Nosson Fasman
239 S. Formosa Ave.
Los Angeles, CA 90036-2813

Comment No. 171-1

I am a long-time resident of Beverly Fairfax. Recently, I read over the Draft Environmental Impact Report for the Television City Project. I find this draft EIR to be really concerning and found myself with more questions than answers. In this letter, I am going to outline several of my questions related to the DEIR's alternative mobility plan, specifically. I hope the City and the developer take time to read each of my questions and respond with thorough answers.

Response to Comment No. 171-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 171-2 and 171-3.

Comment No. 171-2

Currently, this development proposes that employees and visitors will use alternative means of transportation for live shows. While I concede that (in theory) this would help reduce traffic, I do not see how this plan is feasible in application. What is the plan if Television City is hosting live shows before the future Metro purple line is finished? The Wilshire/Fairfax stop is not expected to be operational until 2024. Will employees and audience members need to use the parking available to residents until the Metro stop is operational? What happens when track maintenance on the purple line is happening? These estimates seem inflated. What additional studies can be conducted to give realistic alternative mobility estimates?

Response to Comment No. 171-2

This comment is identical to Comment No. 108-3. Refer to Response to Comment No. 108-3, above.

Comment No. 171-3

Furthermore, I am concerned that this alternative mobility plan is ableist. The future Wilshire/Fairfax stop is 0.8 miles away from Television City. Are high-quality sidewalks in

place for those who may use a wheelchair? If so, where are they located and when were they last determined to be ADA-approved? Will the crosswalk signals be adapted so that blind employees and visitors can safely walk the 0.8 miles to the studio? If they have not already been adapted, when will these critical changes be made?

Response to Comment No. 171-3

The transportation plan for connecting the subway station to the Project Site includes a direct shuttle system that would carry Project employees and visitors between the subway station and the Project Site's Mobility Hub to be located on-site near the signalized intersection of Fairfax Avenue and 1st Street. Refer to Topical Response No. 7, Mobility Hub. This shuttle would be capable of accommodating blind, wheelchair, and ADA visitors and employees. Overall, the Project would be ADA compliant.

Comment No. 171-4

Ultimately, I want to make sure this project makes sense for all Beverly Fairfax residents. In its current state, I do not see that being possible. When will the city release a revised DEIR with reflections of the community's wants and needs?

Response to Comment No. 171-4

This comment is identical to Comment No. 108-4. Refer to Response to Comment No. 108-4, above.

Comment No. 171-5

I look forward to hearing your response.

Response to Comment No. 171-5

Refer to Response to Comment Nos. 171-1 through 171-4. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 172

Michael Fazie
7957 W. Fourth St.
Los Angeles CA 90048-4412

Comment No. 172-1

When I learned of the Television City Studio project, traffic was the first thing to come to my mind. With this new development will come more cars driving through my residential area. Noise will increase. Air quality will be impacted for sure.

Response to Comment No. 172-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

With respect to neighborhood intrusion, the Transportation Assessment, included as Appendix M.1 of the Draft EIR, includes a residential street cut-through analysis as part of its non-CEQA transportation analysis. Refer to pages 167–173 of the Transportation Assessment. Additionally, the Project calls for the development of a NTMP to minimize potential cut-through trips. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for more information.

Refer to pages IV.I-48 through IV.I-54 of Section IV.I, Noise, of the Draft EIR for an evaluation of transportation noise. As discussed therein, Project impacts associated with transportation noise would be less than significant.

Air quality impacts are fully analyzed in Section IV.A, Air Quality, of the Draft EIR. Refer to Table IV.A-7 on page IV.A-64 of the Draft EIR. As discussed therein, impacts associated with mobile emissions associated with operation of the Project would be less than significant.

Comment No. 172-2

Safety is going to be an issue with even more drivers driving on main streets and driving through neighborhood streets to bypass the backed up traffic on the main streets. What

streets are going to be affected? How did you identify those streets and what was studied and where? What did those studies show about more cars cutting through our neighborhoods to avoid congestion?

Response to Comment No. 172-2

As part of the non-CEQA cut-through analysis, the Project's Transportation Assessment, included as Appendix M.1 of the Draft EIR, details the nearby streets that are the most likely to be affected by potential cut-through trips. Figure 6 in the Transportation Assessment shows the 31 key intersections in the Study Area that were studied in detail, while Figure 21 shows the amount of Project trips assigned to each street in the area. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan.

In terms of traffic safety, Table 23 in the Transportation Assessment shows the traffic safety improvements that are included in the Project's Transportation Improvement Program, including both Vision Zero and Transportation Systems Management improvements, aimed at improving traffic safety in the area. Refer also to Topical Response No. 12, Safety and Congestion.

Comment No. 172-3

I heard that this project will be 2 million square feet. Have you thought about how this will impact the community? The current Television City is embedded in our community. What standards are you applying to determine whether a proposed development fits, or doesn't fit, well in a neighborhood. The neighborhood is long established, with a lot of character and the historic district just to the north. So how was it determined that a huge, modern, tall building would somehow be a good fit? When is a new development determined to not fit well into a community, due to size, scale, proposed uses, too many people coming and going, etc.?

Response to Comment No. 172-3

Refer to Response to Comment No. 11-3 regarding the size of the Project and its compatibility with the surrounding area. The Project would not permit the development of 2 million square feet, as incorrectly stated in the comment. As discussed on page II-12 of Section II, Project Description, of the Draft EIR and throughout the Draft EIR, at full buildout, the proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of floor area within the Project Site, which is a modest, approximately 17-percent increase in permitted floor area compared to existing zoning. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 regarding the Project Description and proposed Specific Plan.

As discussed in Section I, Executive Summary, of the Draft EIR, the Department of City Planning relied upon the thresholds in Appendix G of the CEQA Guidelines, which are discussed in each impact analysis in Section IV of the Draft EIR. Therefore, the assessment of the Project's impacts for each environmental topic studied in the Draft EIR is measured against the thresholds of significance for that topic in accordance with CEQA.

In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's potential to conflict with applicable plans, policies, and regulations that regulate land use on the Project Site, as well as the compatibility of the Project with surrounding land uses, and concluded that impacts would be less than significant. As discussed therein and in Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would retain the Project Site's land use as a studio facility, which has operated in the neighborhood since the 1950s. With the exception of the six-story Broadcast Center Apartments located immediately to the east, surrounding residential areas are separated from the Project Site by major thoroughfares, such as Beverly Boulevard and Fairfax Avenue, and the retail uses that line them. The Project would complement the neighboring community through design elements that would be compatible with surrounding uses; concentrate building height and mass towards the center and rear of the Project Site; and provide an enhanced public realm to promote walkability, foster connectivity and safety, and better integrate on- and off-site uses. The proposed Specific Plan would include height zones with specified maximum height limits to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center and rear of the Project Site, away from Project Site edges. In particular, as shown in Figure II-5 in Section II, Project Description, of the Draft EIR, buildings in Height Zone C in the northeastern corner of the Project Site near the Broadcast Center Apartments would be subject to a base height limit of 88 feet, with a maximum height limit of 160 feet within up to 40 percent of the Height Zone C area. Along the Shared Eastern Property Line, a 30-foot frontage area would provide a transitional buffer between the on-site and off-site uses. Overall, with the exception of the HCM Protection Zone (Height Zone F) where no new occupiable structures could be constructed, the maximum height limits of the proposed height zones would vary from 58 feet to 225 feet, with a base height limit of 88 feet in Height Zones C and D, consistent with the height of the HCM. Frontage areas varying in depth between 5 feet and 30 feet would also be provided on all edges of the Project Site and would function as buffers and transitional space around the Project Site perimeter. Within these areas, features, such as sidewalks, landscaping, security kiosks, fences, walls, projections, stairs, balconies, and parking would be permitted. Additionally, building stepbacks, varying between 10 feet and 20 feet would be provided along Fairfax Avenue, Beverly Boulevard, and the southern property line/Southern Shared Access Drive to reduce building massing and vary building forms by pulling the façade of upper stories back from the building edge at a predetermined elevation. Building stepbacks would apply to those portions of buildings in Height Zones C and D greater than 88 feet in height above Project

Grade. Refer to Response to Comment Nos. 9-16, 11-3, 16-56, 26-8, and 26-19 regarding the proposed height zones and frontage areas.

Furthermore, the Project would enhance the public realm through streetscape improvements to enhance the pedestrian experience. Visual screening and fencing would be provided around the entire Project Site perimeter within a softened, landscaped edge condition. The Project, with its landscaped open space areas, contemporary design, and integration of historic uses that help define the character of the Project Site and surrounding area, would represent a positive contribution to the urban elements of the surrounding cityscape. Refer to Response to Comment No. 16-72 regarding the Project's pedestrian-oriented design and public realm improvements.

As discussed in Section IV.B, Cultural Resources, of the Draft EIR and Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, the Project does not have the potential to directly or indirectly impact the Beverly Fairfax Historic District due to the distance between the Historic District and the Project Site.

Comment No. 172-4

What consideration was given to the impacts of the project on local schools nearby? There are factors to consider given children represent a different, more vulnerable population. Where is the analysis of the impacts on schools and students? What were the findings? How are those impacts going to be addressed? What measures are going to be taken to reduce the impacts on them? Will those impacts and measures be monitored? By whom?

Response to Comment No. 172-4

As stated on pages IV.A-69 and IV.A-72 in section IV.A, Air Quality, of the Draft EIR, and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations, including schools. The HRA was conducted following conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children. For detailed HRA modeling assumptions, refer to Appendix FEIR-10 of this Final EIR.

Pursuant to CEQA, a Mitigation Monitoring Program will be implemented, including reporting and/or monitoring and enforcement procedures, to support the implementation of the Projects environmental commitments (i.e., PDFs and mitigation measures). Refer to Section IV, Mitigation Monitoring Program, of this Final EIR.

Comment No. 172-5

I understand that my neighborhood will never be void of noise or traffic. I understood that when I moved here, but I moved into a residential community. This is a neighborhood and should not be congested with fast cars, heavy trucks, and nighttime traffic.

Please consider these concerns and tell the community how this project is going to respond to those concerns.

Response to Comment No. 172-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 172-1 through 172-4.

Comment Letter No. 173

Joe Ferreri
454 N. Curson Ave.
Los Angeles, CA 90036-2371

Comment No. 173-1

I have lived in Beverly Fairfax for 24 years. As a member of this community, I would like to share my questions and concerns about the Television City Project's draft Environmental Impact Report.

Response to Comment No. 173-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 173-2.

Comment No. 173-2

When will the public learn more about the project's specific plan? Primarily, I am concerned about the lack of information around each building's location. The height map you provided allows 15-20 story buildings, with no real plan for where they'll be located. While it might not make much of a difference for the developer's operation, it could make a big difference on how I feel about this project. Until I see the specific plan, I will struggle to support this project. When will the city re-circulate the DEIR to include this plan? More importantly, did the city and developer ever draft the specific plan? If so, why did it not make it in the DEIR?

Response to Comment No. 173-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, the proposed development program that was analyzed in the Draft EIR, and the level of detail required for a specific plan project EIR. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. As further discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 173-3

Again, I will not be able to support this project until I see its specific plans. Additionally, I will struggle to support this if my questions above go unanswered.

Response to Comment No. 173-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 173-2.

Comment Letter No. 174

Ryan Fey
460 Harper Ave.
Los Angeles CA 90048-2221

Comment No. 174-1

I cannot believe that someone would submit a draft EIR this vague and the city would seriously consider moving forward. This is an almost 2,000,000 square foot immense project that will bring thousands of new people into our neighborhood and we know almost NOTHING about it.

Response to Comment No. 174-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 174-2 through 174-4.

Comment No. 174-2

1. What is a specific plan and where is the specific plan? It isn't in the EIR. Why isn't it circulated with the EIR? When will we get to see it? What if there are details and specifics about the project in the specific plan that would be problematic for the community, but the community does not see those details before the project gets approved? How does that make any sense?

Response to Comment No. 174-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, including how the Specific Plan was not required to be included as part of the EIR and how the physical aspects of the Specific Plan are fully accounted for in Section II, Project Description, of the Draft EIR and in the associated impact analyses throughout the Draft EIR. Although not required by CEQA or a City policy, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR. Please note that the Preliminary Draft Specific Plan incorporates the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of the Final EIR.

Comment No. 174-3

2. What new buildings are being constructed on the property? Where are they, exactly? How tall and what size are they? And what will those buildings be used for? What if what the buildings are going to be used for is not compatible with the nearby residential area? Please give us specifics.

Response to Comment No. 174-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, the Conceptual Site Plan that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan. As discussed therein, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Refer to Response to Comment No. 5-9 with regard to building heights and height zones. Refer to Topical Response No. 3, Permitted On-Site Uses, with regard to the studio land uses that would be permitted in the proposed Specific Plan Ordinance. Regarding the height of the Project, including with respect to surrounding uses, refer to Response to Comment Nos. 11-3 and 26-7. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's potential to conflict with applicable plans, policies, and regulations that regulate land use on the Project Site, including the LAMC, among others, as well as the compatibility of the proposed uses with surrounding land uses, and concluded that impacts would be less than significant.

Comment No. 174-4

3. There are historic buildings in this neighborhood. We care about the character of our neighborhood and want to see that character maintained. How is the impact on those buildings considered by the developer? What about the historic buildings on the lot? Which are historic? How old does a building have to be to be considered historic and why? If a building is important to the character of our neighborhood and is part of our city's history, shouldn't the project's impact on the building be preserved? Why or why not?

Response to Comment No. 174-4

The Draft EIR fully evaluated the Project's potential impacts on historical resources on the Project Site and in the vicinity in Section IV.B, Cultural Resources, of the Draft EIR and the Historic Report (Appendix C.1 of the Draft EIR), and concluded that impacts would be less than significant (see pages IV.B-41 to IV.B-59 of the Draft EIR). Also refer to Sections D, Analysis of Impacts to the Primary Studio Complex, and E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5,

Historical Resources, regarding how impacts to the Primary Studio Complex were analyzed in the Draft EIR. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5 regarding the portions of the Primary Studio Complex that are designated as an HCM. In addition, refer to Subsection IV.B.2.a in Section IV.B, Cultural Resources, of the Draft EIR for a comprehensive explanation of the criteria to be considered a historical resource.

Comment No. 174-5

We live here. We want answers and this project should NOT move forward until the developer spells out the full details of what this project actually is.

Response to Comment No. 174-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 174-2 through 174-4.

Comment Letter No. 175

Lisa Field

Comment No. 175-1

As a nearby resident, I am concerned about this proposed Television City studio development. Unfettered growth in the area is only causing more pollution from increased vehicle traffic. Inevitably we will witness an increase in pedestrian injury and death caused by the influx of new vehicles on the road, and the confusion that a huge construction project like this will create in the area for walkers and cyclists.

We have a duty to safeguard all resident's health and wellbeing, but I feel particularly fearful for our children at Fairfax High School as they walk to and from their place of learning through the mess the project is going to create.

Response to Comment No. 175-1

Air quality analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, of the Draft EIR. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. All other air quality impacts would be less than significant or less than significant with mitigation. Refer to Response to Comment No. 26-E.1-2 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant.

Pedestrian hazards and safety are discussed in Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3. As discussed in detail therein, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting and construction process, and safety issues, such as safe sight distance and pedestrian control across the signalized locations, would be confirmed in the detailed driveway design approval process. Much of the Project's Transportation Improvement Program is focused on Vision Zero improvements aimed at pedestrian safety and bus stop enhancements. The Project would also implement improved pedestrian crosswalks, a pedestrian crossing beacon, left-turn arrows, and traffic signal improvements, which would all contribute to area-wide pedestrian safety.

Furthermore, a CTMP would be required pursuant to Project Design Feature TR-PDF-1, which will address many of the comment's concerns regarding pedestrian safety during construction. No sidewalks adjacent to the Project Site would be closed

during construction for anything but very temporary occurrences such as utility connections from the street to the Project Site. In the event of a temporary sidewalk closure, a safe temporary alternative would be provided.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 175-2

And if we must build, why don't we build more affordable housing for the poor and lower middle-class folks that already live right here in the neighborhood or nearby? If we must increase the number of vehicles in the area, let it be because we have opened our doors to residents priced out of adjacent areas. We can serve as a good neighbor, and I strongly recommend we do just that. L.A. and L.A. County have a wonderful opportunity to act boldly—and acting boldly means standing up to useless development in favor of development that helps everyone instead of the wealthy few. With rent prices rising astronomically, and the dream of homeownership out of reach for all but the most privileged among us, we must set the example for the rest of the city of Los Angeles and reject this proposed development.

Response to Comment No. 175-2

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, the provision of housing, and the consideration of economic and social effects under CEQA.

Comment No. 175-3

As a lifelong Angeleno, I urge you to reject this pointless project, but I also challenge you to push harder to encourage the right kinds of development to make the city we all love more livable.

Response to Comment No. 175-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 175-1 and 175-2.

Comment Letter No. 176

Allen Fineman
614 S. Orange Dr.
Los Angeles, CA 90036-3508

Comment No. 176-1

This letter is in reference to the TVC 2050 project. In the Environmental Setting section of the Land Use and Planning chapter, the developer states that the land use chapter of the City's General Plan included policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. My question is: How will this proposed project support the vitality of the City's residential neighborhoods and commercial districts? What criteria was applied in what constitutes vitality? That is a sweeping statement, please explain specifically. Also, were residents asked about whether they want this project that will supposedly support the vitality of this area?

Response to Comment No. 176-1

The discussion referenced by the commenter is part of the regulatory framework section of Section IV.H, Land Use and Planning, of the Draft EIR, which generally describes the Land Use Chapter of the General Plan Framework Element and is not a specific objective or policy contained therein. While the text discussed by the commenter is not a specific objective or policy, the Draft EIR analyzed the potential for a significant impact related to land use based upon the Appendix G thresholds in the CEQA Guidelines, which states that the Project would have a significant impact related to land use if it would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As discussed on pages 1–8 of Appendix I, Land Use Plans Consistency Analysis Tables, of the Draft EIR, the Project would not conflict with the applicable objectives and policies of the General Plan Framework's Land Use Chapter that were adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant. Note the term vitality is intended to convey the ability for an area to endure. Refer to Response to Comment No. 11-3 regarding the Project's scale and compatibility with the surrounding area. Also refer to Response to Comment No. 172-3 with regard to the Project as it relates to the surrounding community and to Response to Comment Nos. 28-13 and 32-3 regarding the public outreach that has been conducted for the Project and the noticing of the Project in compliance with CEQA.

Comment No. 176-2

The residential neighborhoods that are directly adjacent to this bustling area have already been struggling with serious traffic concerns, lack of parking, lack of accessibility when it comes to sidewalks/bus stops/benches, and crime. Beverly Fairfax is a very established historic district. Given that the size of a project would take years to fully complete, it would require the surrounding community to adjust for years-long inconvenient construction. What benefits will come to the residential neighborhoods if this project is approved? Not benefits to other organizations and programs, but what are the community benefits directly to the residential neighborhoods that will be most impacted by the project?

Response to Comment No. 176-2

This comment, expressing generalized concern about existing conditions in the Project vicinity and construction, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to congestion during construction, as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, congestion is not a CEQA impact. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

As discussed in Topical Response No. 13, Parking, the proposed onsite parking supply would be sufficient to accommodate the peak parking demands of the Project and would prevent spillover parking. Please note that the adequacy of a project's parking supply is not an environmental impact under CEQA.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding access and safety.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, for a discussion of why potential cut-through trips would not result in a significant CEQA impact on the Beverly Fairfax Historic District.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 176-3

There are many schools in the Beverly Fairfax district where many students use our sidewalks, bike lanes, and bus stops daily. With everything that I've read about the project, it seems like a project where they have to include very long-term adjustments for the nearby neighborhood for this project to be completed. Do we have any indication that this project is the appropriate scale for the neighborhood that Television City resides in? What leads the city to conclude that, if so? Where is scale, size, character, fit in the neighborhood considered? Please explain the details of that analysis.

Response to Comment No. 176-3

The existing schools near the Project Site were considered throughout the Draft EIR, including the transportation analysis included in Section IV.K, Transportation, and Appendix M.

With respect to the scale and character of the Project, pursuant to Public Resources Code Section 21099, because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 31–40 of the Initial Study.

Refer to Response to Comment No. 131-2 regarding the Project's height and scale.

Comment Letter No. 177

Julie Finger
156 S. Gardner St.
Los Angeles, CA 90036-2718

Comment No. 177-1

I am wondering if the Draft EIR actually took into account those of us who live adjacent to the proposed projects who have been working from home since the start of the pandemic. Many of us will continue to work from home as the new normal. As 55 year resident this has changed the complexion of the community.

Response to Comment No. 177-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 177-2

According to the Draft EIR, there will be significant impacts from noise. Based on Appendix M of the Draft EIR, the hauling of material is estimated at 772,000 cubic yards. However, Footnote 11 indicates that this number is just an estimate and that the amount is actually 822,000 cubic yards of material. Why the difference? Further, the hauling of this material is anticipated to take 9 months. Does that mean residents who live adjacent to Beverly Boulevard (the anticipated route) will have to endure the noise of haul trucks for 9 months? The Draft EIR is identifying 640 daily truck trips during that time period. What is the applicant doing to mitigate this impact on residents?

If the project's proposed development agreement is approved by the decision-makers, does that mean that residents will have to endure a relentless bombardment of noise during the construction of a 20-year period? If this is the case, will the construction have any interim periods of "no-build" so the community can have some relief from the construction noise?

Please explain how your methodology took into consideration the project's noise impacts on those of us working from home in the adjacent residential properties.

Response to Comment No. 177-2

As stated in the Project Description and throughout the Draft EIR, the Project would include an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill and up to 772,000 cubic yards of export, and all earthwork volumes include estimates for both rough grading and over-excavation. As stated in footnote 11 on page 181 of the Transportation Assessment (Appendix M.1 of the Draft EIR), the 772,000 cubic yards of excavated material represents the estimated quantity of export, and a total of 822,000 (772,000 + 50,000) cubic yards of total import/export material is anticipated during excavation. The Draft EIR analyzed potential impacts related to hauling and import/export in the relevant environmental topic areas.

As shown in Table IV.I-11 on page IV.I-42 of Section IV.I, Noise, of the Draft EIR, off-site noise impacts from haul truck trips along Beverly Boulevard would be less than significant. As discussed in Section II, Project Description, of the Draft EIR, hauling activities would occur between the hours of 7:00 A.M. and 4:00 P.M. with approval from the Bureau of Engineering District Engineer as well as between 8:00 A.M. and 4:00 P.M. on Saturdays.

Refer to Response to Comment No. 9-24 regarding the construction timeline and proposed Development Agreement and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

The noise analysis included in Section IV.I, Noise, of the Draft EIR is based on the increase in noise over ambient conditions. Refer to Response to Comment No. 26-E.1-5 for a discussion of noise measurement standards and to pages IV.I-32 through IV.I-33 of the Draft EIR for a detailed description of the methodology used to evaluate noise impacts.

Comment Letter No. 178

Brian Finke
6367 Drexel Ave.
Los Angeles, CA 90048-4703

Comment No. 178-1

I have many qualms with this project, so I'll try to be concise. Here are my issues:

Response to Comment No. 178-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 178-2 through 178-6.

Comment No. 178-2

- The project applicant is trying to put a massive parking lot right next to the homes of working people. Grove Street can't handle the cars that already park there, let alone a swarm of TVC employees that will come. How is this going to be dealt with?

Response to Comment No. 178-2

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. The parking areas being constructed along the north and west boundaries of the Project Site (i.e., the areas closest to existing residential neighborhoods) are proposed to be underground parking structures in order to minimize noise and visual impacts on the residents.

The traffic capacity analyses presented in Table 18 on page 162 in the Project's Transportation Assessment (Appendix M.1 of the Draft EIR) showed that The Grove Drive had more available capacity than either Fairfax Avenue or Beverly Boulevard and is capable of handling the Project trips.

Comment No. 178-3

- More traffic next to Loyola High School?? Really?? Loyola is in a relatively low-income neighborhood. Way to show what kind of people you care about.

Response to Comment No. 178-3

Loyola High School is located more than 4 miles away from the Project Site. Less than 10 percent of Project trips is anticipated to approach the Project Site from the southeast, and, therefore, the Project's impact on the streets in the vicinity of the school would be minimal. Further, all construction haul truck staging would occur on-site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 178-4

- The traffic this project would produce on all of the surrounding streets and beyond is astronomical! I'll spare you the normal complaints about traffic. I'm more worried about what these extra idling vehicles would do to our environment! LA is already covered in smog every day. This project would just make this worse.

Response to Comment No. 178-4

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project.

Air quality impacts are fully analyzed in Section IV.A, Air Quality, of the Draft EIR. Operational emissions, including those associated with traffic, were determined to be less than significant. Refer to Section IV.A, Air Quality, of the Draft EIR, pages IV.A-69 through IV.A-73. Furthermore, all construction haul truck staging locations would be located on-site, so no haul trucks would be idling off-site. Per CARB-mandated limits, diesel-fueled commercial vehicles (delivery trucks) are not allowed to idle for more than 5 minutes at any given time, which would further limit diesel particulate emissions.

Comment No. 178-5

- The EIR is clearly written to keep residents like me in the dark. How am I supposed to comment on a "conceptual" plan? How am I supposed to read and understand technical studies and analyses? The impacts this project would have on my life are not conceptual. They're very real. I want an honest chance to see real plans, so I can give my real opinion.

Response to Comment No. 178-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, how the Project Description discloses all of the elements of the Project required by

CEQA, and the required discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project that was analyzed in the EIR. As discussed therein, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, CPC-2021-4089-AD-GPA-ZC-SN-SP. As also discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Refer to Response to Comment Nos. 28-13 and 32-3 regarding the public outreach that has been conducted and the noticing of the Project in compliance with CEQA. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day period required under CEQA. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Comment No. 178-6

All in all, can someone please explain to me what's actually happening here? They say they will accompany the "general plan" with a "specific plan." That sounds like developer garbage to me. If they actually cared about Beverly Fairfax, they would make sure residents and community members get to voice their opinions. Until I have ample opportunities to voice my opinion and see proof that developers care, I think this project should be rejected.

Response to Comment No. 178-6

Refer to Response to Comment No. 178-5 regarding the adequacy of the Project Description.

The remainder of this comment does not raise an environmental issue specific to CEQA, the Draft EIR, or the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 178-7

Thank you. I look forward to seeing how the City of LA responds.

Response to Comment No. 178-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 179

Miriam Fishman
135 S. Formosa Ave.
Los Angeles, CA 90036-2815

Comment No. 179-1

The proposal to reconstruct Television City and add various buildings is not only a change to one specific area, but it will transform the Beverly Fairfax neighborhood and Beverly Fairfax Historic District into an urban center we will not recognize anymore.

Response to Comment No. 179-1

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project would not result in any significant impacts to the Beverly Fairfax Historic District.

The comment regarding transformation of the Beverly Fairfax neighborhood and Beverly Fairfax Historic District into an urban center does not concern the Draft EIR's analysis of environmental impacts, and no further response is required. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 179-2

The plan details are confusing and unspecific. The draft Environmental Impact Review seems to explain that changing the zoning would allow the developers to build a variety of types of buildings. This gives way too much flexibility to the developers, leaving the community with no information about the potential impacts of the different possible development scenarios. For instance, the proposal could allow for a building over twenty stories to be constructed right near the Adobe and the Farmers Market. When would the community know if that is actually going to be built? What about the impacts to the Adobe and Farmers Market if that happens? What about the impacts if a different scale building and location are built? What is the expected loss of revenue for the Adobe and Farmers Market during construction?

Response to Comment No. 179-2

As discussed throughout the Draft EIR, the Project is a studio project, and the proposed Specific Plan will permit five land uses (i.e., sound stage, production support, production office, general office, and retail). Refer to Topical Response No. 1, Clearly

Defined Project Description and Specific Plan, and Topical Response No. 3, Permitted On-Site Uses. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project. The Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website for informational purposes prior to the release of this Final EIR. Please note that this draft is not final and has not been reviewed or approved by City decision-makers (it will be reviewed by City decision-makers following the publication of this Final EIR). Please note that the Preliminary Draft Specific Plan incorporates the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of the Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as CEQA compliance review. Following the publication of this Final EIR, a finalized draft of the Specific Plan and the Project's other requested approvals will be considered during several public hearings and meetings before City decision-makers prior to any approval.

With regard to building heights, new buildings would be constructed in accordance with the Height Zone Map provided in Figure II-5 of the Draft EIR.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project would not result in significant impacts to the Gilmore Adobe or The Original Farmers Market.

The comment regarding loss of revenue does not relate to the Draft EIR's analysis of environmental impacts. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 179-3

Will parking at either of these sites be removed or limited during any of the construction stages?

Response to Comment No. 179-3

Neither the parking supply nor the operation of the parking on The Original Farmers Market or The Grove would be affected by the construction on the Project Site.

Comment No. 179-4

From what sides will the Original Farmers Market sign be blocked? This sign is a long recognized part of our community.

Response to Comment No. 179-4

The Project Site is located north of substantial existing commercial development associated with The Grove shopping and entertainment center. No interruption of existing views of The Original Farmers Market sign from the public right-of-way is anticipated as a result of the Project. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comments Nos. 5-13 and 363-1 regarding impacts to The Original Farmers Market.

Comment No. 179-5

Will construction of the project impact access and parking at Farmers Market? Where will customers and employees park at the Farmers Market park during construction? If they have to park far away from the site, will the developers provide a shuttle service and how frequently will it run?

Response to Comment No. 179-5

Project construction would not affect access or parking at The Original Farmers Market.

Comment No. 179-6

Has there been an analysis on the impact of vibration frequencies to the Adobe, and what were the findings? This site dates back to the 18th century. Is there a study on the impacts of ground shaking activities, blasting and vibrations on an 18th century building? Please provide a complete analysis before beginning any construction. This is a historic district. We need to preserve our historic landmarks.

Response to Comment No. 179-6

Refer to Response to Comment Nos. 26-139 and 363-2 for a discussion of vibration impacts to the Gilmore Adobe. As discussed therein and demonstrated on page IV.I-60 of the Draft EIR, vibration impacts to the Gilmore Adobe would be less than significant. Further, as concluded in Section IV.B, Cultural Resources, of the Draft EIR and discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, historic impacts to the Gilmore Adobe would be less than significant.

Comment No. 179-7

I am asking the Los Angeles city planners and the developers of this project to revise the draft EIR with specific information on project details and planning stages. I worry for my community and my neighbors. Thank you for your consideration on these important issues.

Response to Comment No. 179-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 179-1 through 179-6.

Comment Letter No. 180

Joanne Floro
152 S. Hayworth Ave., Apt. 5
Los Angeles, CA 90048-3616

Comment No. 180-1

If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with the consequences of the increased pollution, noise and traffic, the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 180-1

This comment is identical to Comment No. 114-5. Refer to Response to Comment No. 114-5, above.

Comment Letter No. 181

Victoria Floro
152 S. Hayworth Ave., Apt. 5
Los Angeles, CA 90048-3616

Comment No. 181-1

If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with, as well as consequences of the increased pollution, noise and the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 181-1

This comment is identical to Comment No. 114-5. Refer to Response to Comment No. 114-5, above.

Comment Letter No. 182

Stephen J. Ford
941 N. Genesee Ave., Apt. 3
West Hollywood, CA 90046-7347

Comment No. 182-1

I have been a resident of the Fairfax area for 9 years, and I have a concerns about the TVC proposal. I fear that my daily life is going to be impacted a great deal, and I want some clarification.

Response to Comment No. 182-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 182-2 through 182-4.

Comment No. 182-2

My first question has to do with all of the parking that is going to be required. It seems clear that there will not be enough parking on the property itself. Why else would the plan refer to off-site parking? So, what is considered off-site parking? Where would temporary off-site parking be? What streets do you plan on designating for off-site parking? Which neighborhoods are going to be designated as off-site parking areas? How many cars will be allowed in off-site parking areas? Will truck need to be parked in off-site parking areas? How many trucks are we talking about?

How are you going to make sure that our neighborhoods maintain the same level of safety if more cars are going through them to park? Do you have people to monitor these areas to make sure that children can still walk and play around our streets safely?

Response to Comment No. 182-2

The first paragraph of this comment is identical to Comment No. 103-2. Refer to Response to Comment No. 103-2, above.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as

discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

With respect to neighborhood intrusion, the Transportation Assessment included as Appendix M.1 of the Draft EIR includes a residential street cut-through analysis as part of its non-CEQA transportation analysis. Refer to pages 167–173 of the Transportation Assessment. Additionally, the Project calls for the development of a NTMP to protect the neighborhoods most susceptible to cut-through effects from the Project. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for more information.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Comment No. 182-3

What were the findings about cars or trucks in off-site parking areas emitting exhaust, which will be dangerous to residents nearby? Have there been any studies you have conducted to make sure that air pollution as a result of off-site parking doesn't hurt residents? Please provide as much detail as you can with respect to the health of residents nearby off-site parking zones.

Response to Comment No. 182-3

This comment is identical to Comment No. 103-4. Refer to Response to Comment No. 103-4, above.

Comment No. 182-4

I am also curious about who would be displaced by production and filming related activities, something mentioned in the plan, and why would they be? How many people do you think will be displaced? Over what timeframe do you think they will be displaced? Is the draft EIR referring to employees at the site being displaced? If this is the case, where would they be able to park? Would this flow into our neighborhoods? If so, how many cars will be parking in our neighborhoods? How do we ensure that we are able to park near our houses instead of far away?

Response to Comment No. 182-4

This comment is identical to Comment No. 103-5. Refer to Response to Comment No. 103-5, above.

Comment No. 182-5

The Draft EIR does not go into nearly enough detail about any of the points made above. It would be unfair to the Fairfax community if we became one large parking site. We have a safe and peaceful area now. However, this will change if we become on large parking lot. I look forward to receiving your answers to the concerns and questions I have posed.

Response to Comment No. 182-5

This comment is identical to Comment No. 103-6. Please refer to Response to Comment No. 103-6, above.

Comment Letter No. 183

Austin Fomme
112 S. Hayworth Ave., Apt. 5
Los Angeles, CA 90048-3623

Comment No. 183-1

I am very concerned about the walkability and safety issues about this proposed project. Also, the possible 20 years of emissions, traffic and lack of parking. As well as a hundred thousand or more trucks going to go up and down Fairfax to build this project. What is an accurate count of all the trucks needed?? What will be the physical impact to Fairfax from these massive trucks going up and down Fairfax. Can you tell me how many schools, churches, temples, homes and apartments on Fairfax will be impacted? Someone should actually count the numbers of these uses along Fairfax. And isn't Fairfax a single lane in each direction for portions? And you want to bring a hundred thousand or two hundred thousand trucks through this area? Have these people and businesses along this corridor been told what is going to happen to them?? Did you mail notices to these people? And you want to park thousands of trucks over by Loyola High School?? And by the Kaiser Hospital.

Have you notified the High School and the hospital of this?? The noise, air quality, safety issues through this area will be tremendous. Where is the analysis of all this? And why did the developer pick a lower income area to park these trucks in?? Can you provide the demographic information for these communities where the developer wants to park tens of thousands of trucks and polluting these communities?? Were these communities mailed notices of the Draft EIR??

Response to Comment No. 183-1

First, construction of the Project is not expected to take 20 years. The Draft EIR analyzes a construction schedule of approximately 32 months. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. The Development Agreement would be valid for a 20-year time frame, and the Project is requesting the opportunity to construct portions of the Project over that time period. Refer to Response to Comment No. 9-24 regarding the construction timeline.

Refer to Response to Comment No. 162-2 regarding the construction assessment included in Appendix M.1, Transportation Assessment, of the Draft EIR. Refer to Topical

Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

The reference to “a hundred thousand or more trucks going to go up and down Fairfax to build this project” is incorrect. Page 180 of the Transportation Assessment (Appendix M.1 of the Draft EIR) explains the truck movements on one of the busiest construction days of the year, and it shows that a total of approximately 320 trucks per day will enter the Project Site. As also described in Topical Response No. 14, there would be three haul routes used by the construction trucks serving the Project Site. Not all of the Project construction trucks will use Fairfax Avenue and especially not the two-lane section of Fairfax Avenue. There is no longer a plan to stage haul trucks near Kaiser Hospital or Loyola High School. All haul trucks would be staged on the Project Site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Pedestrian hazards and safety are discussed in Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3. As discussed in detail therein, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting and construction process, and safety issues, such as safe sight distance and pedestrian control across the signalized locations, would be confirmed in the detailed driveway design approval process.

Noticing for the Project has been conducted in accordance with CEQA. Refer to Response to Comment No. 28-13 regarding the comprehensive public outreach that has occurred and to Response to Comment No. 32-3 regarding noticing for the Project.

Air quality and noise analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. All other air quality impacts would be less than significant or less than significant with mitigation. As discussed in Section IV.I, Noise, of the Draft EIR, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. All other noise impacts would be less than significant.

Comment Letter No. 184

Tamar Frankiel
435 N. Alta Vista Blvd.
Los Angeles, CA 90036-2540

Comment No. 184-1

I am a resident of the Beverly-Fairfax area and have lived here for over 30 years. I state as a disclaimer that I am not a supporter of nor have any financial connections with the Grove, Farmers Market (“Original” or later), or any political alliances related to the upcoming Los Angeles mayoral election.

Response to Comment No. 184-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 184-2

First, let me say I am not opposed to commercial development of the former CBS Television property or to continuing its primary use for entertainment production.

Response to Comment No. 184-2

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 184-3

However, I am opposed to the size of the project—not out of purely aesthetic concerns such as high towers, but the demands this will place on the City government, the neighborhood, and the residents to accommodate the density of occupancy.

Response to Comment No. 184-3

Refer to Response to Comment No. 11-3 regarding the size of the Project. With regard to the demands the Project would place on the City government, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2 Public Services—Police Protection, of the Draft EIR regarding the less-than-significant impacts of the Project related to fire and police protection services. With regard to other governmental services,

such as parks and libraries, impacts to these services were determined to be less than significant in the Initial Study (Appendix A of the Draft EIR). Refer to Response to Comment No. 100-2 for further discussion with regard to the Project's impact upon infrastructure and public services. Also refer to Response to Comment No. 172-3 with regard to the Project as it relates to the surrounding community.

Comment No. 184-4

Of the main details involved in such a huge project, I have chosen to focus on transportation and parking.

Response to Comment No. 184-4

Refer to Response to Comment Nos. 184-7 through 184-9 with regard to transportation and parking.

Comment No. 184-5

I will also state objections to the rezoning question (Regional Center designation).

Response to Comment No. 184-5

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 184-6

Further, because of the massive size of the project, I will state an objection to the process, which has not included enough citizen input or given enough time for same.

Response to Comment No. 184-6

Documented outreach efforts have occurred with regard to the Project. As discussed in Response to Comment Nos. 28-13 and 32-3, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 184-7

Transportation and Traffic:

The_Wilshire [sic] Community Plan states in section 16-2.1:

No increase in density shall be effected by zone change, plan amendment, subdivision or any other discretionary action, **unless** the Decision-makers make the following findings or a statement of overriding considerations, [namely, that]:

The transportation infrastructure serving the project site and surrounding area, presently serving the affected area within the Wilshire Community Plan, have adequate capacity to accommodate the existing traffic flow volumes, and any additional traffic volume which would be generated from projects enabled by such discretionary actions.

For the City to affirm the above, the Planning Department should demonstrate that (1) the estimated 4000 workers on the project during construction will be accommodated by the transportation hub at Beverly and Fairfax; **and** (2) after construction when the property is in regular use, the number of workers estimated to be on the property daily would not generate traffic volume beyond capacity; **and** (3) that existing parking in the community will not be reduced by employees on the property, as TVC2050 has affirmed.

The TVC2050 plan argues that there will be no conflict with this section of the Wilshire Community Plan. This is based on complicated calculations that result in a VMT (Vehicle Miles Traveled) assessment, joined to claims that studio production is on different schedules than normal office work, *and* adding numerous promises for future improvement by the Project developers or by the City (not clear which). This argument depends on hypothesis and hope. Notwithstanding the optimism, the plan certainly is in conflict with the ability of the infrastructure **presently serving the affected area** to accommodate the existing and future-generated project and not negatively affect either the site **or the surrounding area**.

We have to face the facts: The only mass transit currently serving the area is a few bus lines. I will not spell out the details, but a straightforward layman's accounting, based on current bus sizes, number of lines, and a conservative estimate of current riders on the buses at Fairfax/Beverly and Fairfax/West 3rd intersections, is that in either 3-hour 'rush'

segment, morning or evening, 600 bus seats might be available in any given direction. Not enough for thousands of construction workers now, nor thousands of office workers later.

Response to Comment No. 184-7

As discussed on pages IV-K-65 and IV.K-66 of Section IV.K, Transportation, of the Draft EIR, the Project would not conflict with Objective 16-2 and related Policy 16-2.1 of the Wilshire Community Plan.

Refer to Response to Comment No. 162-2 regarding the construction assessment included in Appendix M.1, Transportation Assessment, of the Draft EIR. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Under SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, impact thresholds relative to changes in driver delay are no longer applicable to identify transportation-related significant impacts under CEQA, and “conflicts” with LOS policies under the Wilshire Community Plan are not significant under CEQA. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). Nevertheless, the Project would implement a comprehensive TDM Program that would encourage visitors and employees to reduce vehicular traffic on the adjacent streets during the peak hours by promoting carpooling and non-auto travel through pedestrian-friendly designs and orientation that facilitates transit use. Although Project trips could be further reduced with implementation of TDM Program, no additional trip reductions were assumed in the operational LOS evaluation. As stated in LADOT’s Assessment Letter provided in Appendix M.2 of the Draft EIR, LADOT has reviewed the non-CEQA operational evaluation and determined it adequately discloses operational effects. Thus, the Draft EIR and Transportation Assessment fully evaluated and disclosed the operating conditions of the street system in accordance with the City’s guidelines. Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 regarding the effectiveness of TDM programs.

Regarding the comments that the “only mass transit currently serving the area is a few bus lines,” that comment is incorrect. If constructed in a single phase on a 32-month timeline, by the time that Project construction is completed, the Metro D (Purple) Line Wilshire/Fairfax Station is expected to be completed, and the Project’s Mobility Hub would include by a dedicated shuttle bus system that connects Project employees, visitors, and audience members directly to the Wilshire/Fairfax Station.

Also, pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the onsite parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 184-8

Also, TVC 2050's assessment of streets affected by through traffic includes only a few blocks across Beverly Blvd, and across Fairfax. All of us who drive in the area know that any traffic increases on Beverly have impacts as far north as Willoughby, as far east as La Brea, and as far west as Crescent Heights. The east-west streets to the south, from 6th to Pico, are already maxed out at rush hours.

Response to Comment No. 184-8

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR), and in particular Section C, Boundaries of the NTMP Areas. As stated therein, a project's effect on congestion and automobile delay, including cut-through trips, are not transportation impacts under CEQA. Nevertheless, as discussed in Topical Response No. 9, the Project would include an NTMP to minimize potential cut-through trips on the residential streets surrounding the Project Site. In addition, refer to Topical Response No. 11, Transportation Demand Management, which discusses the Project's robust TDM Program aimed at reducing vehicle trips and promoting public transit usage.

Comment No. 184-9

Parking: The TVC2050 project promises parking for 5,300 cars (obviously, after construction is complete). Is this truly enough to accommodate employees working in the 1,800,000 sq ft project? The project touts its ability to "create" 14,000+ jobs, but that includes jobs throughout the city, not only on the property. So, ignoring that promotional advertising, how many people might be working on the property?

There is an industry standard to calculate square feet per person: On [sic] person per 125 square feet of office space.

The TVC2050 plan says that of the more than 1,800,000 square feet, 25% per cent [sic] will be dedicated to sound-stage production and 75% to office space in 4 tower buildings. Thus office space could be 1,325,000 sq ft. Just to operate with round figures, let's knock off 7-1/2% of that for executive suites and conference rooms, and say 1,250,000 sq ft is simply "offices." At 125 sq ft per worker that is 10,000 office workers.

TVC2050 has certainly not contemplated providing parking for that many people, and instead uses a different calculation, namely: 1 to 3 parking spaces per 1000 square feet of floor area. This is not adequate for the percentage of office space planned, for it amounts to 1 to 3 spaces for 8 employees in the office portions (1,350,000 square feet), and none for employees in the sound production buildings. Their way of calculating parking assumes uniformity throughout the property, and as their own evidence indicates, many fewer people work per square feet in the production buildings than in the offices.

All this points to a central problem with massive office buildings with high density worker population. It's unrealistic to manage the vehicle traffic, it's impossible to provide enough parking. Not to mention the many other projects in the city that could have additional impact.

None of this includes the people TVC2050 describes as “guests”—presumably those who have appointments on the property, or studio audiences, all of whom will have to find parking on nearby streets. The Draft EIR describes many local streets where “unmetered parking with permit exemptions” is “generally available” (IV.K-16-28). While technically that's true, permit exemptions are, of course, intended for residents, their guests, or the disabled; and the reality is that street parking is tight for other visitors and retail customers. No one should be misled by the Draft EIR into thinking that TVC guests will find easy parking within a few blocks!

Response to Comment No. 184-9

Although the adequacy of a development's parking supply is not a CEQA impact per SB 743, a response to this comment is included for informational purposes. Refer to Topical Response No. 13, Parking, for a discussion of the Project's proposed on-site parking supply, the parking ratios in the proposed Specific Plan, the adequacy of the proposed on-site parking supply to meet the peak parking demand of the Project and prevent spillover parking, and the results of the shared parking analysis.

The comment describes an “industry standard” employee density of one person per 125 square feet of office space but provides no citation. As shown in Table IV.K-5 of the Draft EIR, the Project would employ approximately 7,832 people on-site, including approximately 7,752 non-retail employees. These estimates include one employee per 250 square feet of office space (5,600 employees in 1,400,000 square feet of general and production office allowed under the Specific Plan) in accordance with the ratios identified in Table 1 of *City of Los Angeles VMT Calculator Documentation* (City of Los Angeles, May 2020). The remainder of the employee estimates were identified in Table 3 of the Project's Initial Study, provided as Appendix A.1 of the Draft EIR. There would not be 10,000 office workers at the Project Site, as incorrectly stated in the comment. Refer to Response to Comment No. 26-167 for further discussion of the calculation of employees.

The sufficiency of the Specific Plan parking ratios of two to three spaces per 1,000 square feet is described in detail in Topical Response No. 13. Contrary to the comment's claim, the parking ratios are not applied uniformly throughout the property, as different ratios apply to different Project land uses. It should be noted that the LAMC parking requirement for office space is two spaces per 1,000 square feet and the Specific Plan ratio is three spaces per 1,000 square feet for the general and production office uses.

While the management of vehicle traffic is not an environmental impact category under CEQA, the Project's Transportation Assessment (Appendix M.1 of the Draft EIR) included a comprehensive non-CEQA analysis of traffic conditions within the Study Area and at the Project access points with the addition of Project trips as well as trips from related projects in the vicinity. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion.

As discussed in Topical Response No. 13, off-site parking would not be needed to support the Project, as the proposed parking supply would enable all Project employees and visitors to park on-site.

Comment No. 184-10

Objections to the process:

The original proposal was required to be sent in 2021 only to the people and businesses within 550 feet of the boundaries of the project. This is patently outrageous for a project of such magnitude and wide scope, not to mention hundreds of pages of documentation in the Draft EIR.

Response to Comment No. 184-10

Refer to Response to Comment No. 28-13 regarding the comprehensive public outreach that has occurred and to Response to Comment No. 32-3 regarding noticing for the Project.

Comment No. 184-11

The city owes it to the residents of this area to allow much more time for citizens to educate themselves about the proposal and its alternatives.

Response to Comment No. 184-11

Refer to Response to Comment No. 32-3 regarding the public comment period.

Comment No. 184-12

I hope I do not need to say that it would be highly inappropriate to move this project any further, in any way, before the November city elections.

Response to Comment No. 184-12

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 184-13

Objections to rezoning / change [sic] of designation:

TVC2050 does not qualify for designation of this property as a Regional Center.

The Regional Center designation is well described in the Wilshire–Crescent Heights Environmental report as "a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services" (page 3).

While a Regional Center's structures including high-rise buildings can be commercial/professional only (not necessarily residential), the idea is clearly to emphasize diversity and easy integration of various aspects of community life. Regional Centers are supposed to include many "non-work destinations." TVC2050 is an entertainment production center with additional (rentable) work spaces. "Retail" facilities are alluded to but not clear in the plan. No other non-work destinations are mentioned. Other than adding a few gates, it does not encourage pedestrian activity.

Response to Comment No. 184-13

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation.

Comment No. 184-14

Instead of changing the overall designation, the City should allow modest exceptions to the height limits on buildings in the Project area: 7–10 stories for all buildings on the property. The center could continue with its present identity, enhanced.

Response to Comment No. 184-14

This comment does not raise an environmental issue specific to the Draft EIR and the environmental impacts addressed therein. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 185

Tamar Frankiel
435 N. Alta Vista Blvd.
Los Angeles, CA 90036-2540

Comment No. 185-1

Two more questions:

In the DEIR project description, a note on the “Proposed Development Program” table (II-13) says “The proposed approximately 1.874 million square feet of floor area per the Specific Plan definition is equivalent to approximately 1.984 million square feet based on the LAMC definition and approximately 2.103 million gross square feet.” I take it that this means 100000–120000 [sic] square feet would be considered floor area by the Metropolitan Code. Can the builders decide to exempt some of their work to reduce floor area calculations? Or is this an option included in the early planning process?

Second, for this project, office space is divided into two types: “production office” (635,000 sq ft) and “general office” (594,000 sq ft), either of which might be increased to 700,000 sq ft. I understand that production offices support the main industry, media and studio production and their auxiliaries listed previously. Is it correct that the “general” category can be rented out to anyone? And is there any difference, from the City Planning Department’s point of view, between the two categories?—are they both regarded as just commercial office space with no special considerations or exemptions, tax or land use or other, for either type?

Response to Comment No. 185-1

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 5-7 with regard to the definition of floor area under the proposed Specific Plan that was disclosed in the Draft EIR. As discussed in therein, the Draft EIR does not underestimate the size of the Project, and all proposed uses, areas, and activities have been accounted for in the Draft EIR. Table II-2 of the Draft EIR shows the existing floor area, as well as the floor area of the proposed development program illustrated in the Conceptual Site Plan. As shown therein, the proposed development program includes 635,400 square feet of new construction of production office (700,000 square feet total when accounting for existing floor area to remain), and 594,070 square feet of new construction of general office (700,000 square feet total when accounting for existing floor area to remain).

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-12 with regard to the Project Description and proposed Specific Plan, the Conceptual Site Plan that was analyzed in the Draft EIR, and the regulatory process under the proposed Specific Plan.

With regard to the difference between production office and general office uses, refer to Response to Comment Nos. 26-122, which discuss the definitions of the permitted uses in the Preliminary Draft. Generally speaking, production office is specifically related to production activity and general office refers to all office uses, inclusive of production office. Definitions have been added in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 185-2

I would like the FEIR to clarify the differences, in the developers' viewpoint, between the two office types and the rationale for their relative proportions.

Response to Comment No. 185-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 185-1.

Comment Letter No. 186

Yosef Freedman
611 N. Poinsettia Pl.
Los Angeles, CA 90036-1926

Comment No. 186-1

I am very concerned about the TVC 2050 project and its impact on the city's history.

Los Angeles is incredibly storied and millions of people visit every year to see parts of the entertainment industry's past. My understanding is that only a part of this historic CBS building is going to be protected. Why isn't more of the complex going also going to be protected?

The historic part is designated as a Historical-Cultural Monument. If the project were to be approved, the developer changes what gets built from what was approved, does that put the designation at risk? I understand that the designation was based on certain aspects of the iconic building meeting certain criteria. But it seems that some of what is being proposed in the development does not maintain the integrity of the designation, so please explain fully how the integrity of this proposed modern, state of the art development maintains that historic integrity?

Is there a process for ensuring that what led to the protected parts of the site getting the designation in the first place is not going to be compromised? Who is responsibility for overseeing that? What is the process for appealing changes to other older parts of the building that also are historic?

Since there are so many aspects of the development that lack detail, and the developer is asking for flexibility in developing the site, how can we be sure that that flexibility doesn't mean changes to what has been promised regarding the protected part? How can we even know that when changes could be made to aspects of the project?

The city needs to make sure that more of this iconic, legendary building is preserved, as it has a unique and irreplaceable role in the city's television history.

Response to Comment No. 186-1

As discussed in Response to Comment No. 28-25, one of the Project objectives is to "[r]ehabilitate and preserve the integrity of the Primary Studio Complex consistent with the HCM designation and restore the currently obstructed public views of the HCM consistent with the HCM designation, while building upon Pereira & Luckman's master plan for a

flexible and expandable studio campus.” Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the Project Parameters and the rehabilitation and preservation of the Primary Studio Complex.

The Draft EIR included a comprehensive analysis of the Project’s potential impacts to the Primary Studio Complex, which is a designated HCM, in Section IV.B, Cultural Resources, of the Draft EIR and the Historic Report (Appendix C.1 of the Draft EIR). As discussed in Response to Comment No. 26-46, the Primary Studio Complex would retain sufficient integrity to maintain its historic significance, and the Project would have a less than significant impact on the Primary Studio Complex (see pages IV.B-41 to IV.B-55 of the Draft EIR and pages 50 to 64 of the Historic Report).

Refer to Sections A, Existing Evaluation and Designation of the Primary Studio Complex, B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding how the impacts to the Primary Studio Complex were analyzed in the Draft EIR.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. The Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website for informational purposes prior to the release of this Final EIR. Please note that this draft is not final and has not been reviewed or approved by City decision-makers (it will be reviewed by City decision-makers following the publication of this Final EIR). As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

Comment Letter No. 187

Alek Friedman
alek3773@gmail.com

Comment No. 187-1

I am a nearby resident (living just walking distance from the project), and am also an advocate for Smart Urban Growth, Gentrification, and Revitalization. I've also been on the CHNC's Beautification Committee (prior to the pandemic). As such, I would like to express my STRONG SUPPORT for the project.

The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

*As an advocate for Urban development, I also strongly suggest for this project to include *Decorative Sidewalks/ Pavers* on all adjacent pedestrian right-of-ways [sic]. As I'm sure you agree, currently L.A. presents a bleak picture of an endless "Concrete Jungle", due to the prevalence of naked concrete & cement. Time to get rid of it, and upgrade our sidewalks to pedestrian-friendly Pavers. This will undoubtedly make a world of difference!

Please move TVC 2050 forward for approval, and endorse the project. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan will create thousands of production jobs, and will transform the (currently outdated) studio and its appearance—into a 21st century modern, sustainable, family-friendly, and aesthetically rich environment!

Response to Comment No. 187-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 188

Mark Friedman
503 N. Fuller Ave.
Los Angeles, CA 90036-1940

Comment No. 188-1

Thank you in advance for taking the time to answer these questions. I have several concerns about the proposed TVC 2050 expansion.

Response to Comment No. 188-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 188-2

First, what exactly does the EIR mean by fueling stations and vehicle repair? Will there be a gas station (one or more) or mechanic shop on the site—is that what is being referred to? Has there been analysis of having a fueling station next to residences? What safety issues have been identified? Aren't these considered hazardous activities? Does the project need particular permits for those activities or services? What safety measures will be required and implemented? Are they required for the project to get those permits?

Response to Comment No. 188-2

The Project would not include a fueling station, vehicle repair, gas station, or mechanic shop, and these uses would not be permitted under the Specific Plan; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Topical Response No. 3, Permitted On-Site Uses.

Comment No. 188-3

Second, why is the project planning to use natural gas? I thought new buildings were supposed to be electric? What is allowing the project to use natural gas? What will natural gas be used to power?

Response to Comment No. 188-3

Please refer to Response to Comment Nos. 26-51 and 45-1 regarding natural gas usage and the City's new all-electric buildings ordinance.

Comment No. 188-4

Third, will the power generators used on the site run on diesel? Why would this not be electrified? Has there been any impact studies on the use of diesel and its emissions? What health and safety risks are there with the use of diesel?

Response to Comment No. 188-4

The Project will use electricity from power poles, if available, and/or solar generators, rather than temporary diesel or gasoline generators during construction per Project Design Feature AIR-PDF-1 (see page IV.A-47 of the Draft EIR). Refer to Response to Comment No. 26-36 regarding power generators. During operation of the Project, emergency generators will be included for emergency use during a power outage and regularly tested for maintenance purposes but otherwise will not be used to provide power to the basecamps, which will be outfitted with electric tie-ins consistent with the PDFs included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, which reflect the City's new all-electric buildings ordinance (refer to Response to Comment Nos. 26-E.1-21 and 155-4).

As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations. The HRA was conducted following conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population. All Project-related emission sources, including diesel-fueled emergency generators, were analyzed in the HRA. For detailed HRA modeling assumptions, refer to Appendix FEIR-10 of this Final EIR.

Comment Letter No. 189

Sharon Friedman
503 N. Fuller Ave.
Los Angeles, CA 90036-1940

Comment No. 189-1

As a 45 year resident, I am concerned about my quality of life for my remaining years. If the construction can take up to 20 years, will our neighborhood be subject to constant noises for that entire duration? What about the use of lights outside? What hours will we hear those constant noises and what will be the sources of the noise? And what about bright lights during construction and then for the outdoor events—where will they come from and what hours will use of lights be allowed? I live in the Beverly Fairfax neighborhood, and I know how loud construction can be, especially with excavation. Will there be anything mitigating the noise impacts if the project is being built over two decades? Or even in the short term, what steps are going to be taken right away?

Response to Comment No. 189-1

Please note that quality of life is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise. Construction noise impacts were comprehensively analyzed in Section IV.I, Noise, of the Draft EIR; refer to pages IV.I-35 to IV.I-43 therein.

Refer to Response to Comment No. 161-2 regarding construction hours and noise sources. As discussed therein and within the Draft EIR, construction would occur between the hours of 7:00 A.M. and 9:00 P.M., and thus construction lighting would not occur after 9:00 P.M., with the exception of up to five days where mat pour activities could occur during nighttime hours. Any lighting during construction and operation of the Project would be directed toward the Project Site away from residential uses as required by the LAMC. In addition, as described in the Initial Study provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2452, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact.” Therefore, an evaluation of aesthetic impacts related to lighting is not required under CEQA.

Refer to Topical Response No. 3, Permitted On-Site Uses, Section C, Special Events, of Topical Response No. 10, Trip Generation, and Response to Comment No. 66-5 regarding special events.

Refer to pages IV.I-34 and IV.I-56 of the Draft EIR, which includes PDFs and Mitigation Measure NOI-MM-1 to reduce construction noise. Also refer to Response to Comment No. 26-136 regarding additional measures added to Mitigation Measure NOI-MM-1.

Comment No. 189-2

It seems like the analysis for how many people will be driving or commuting on public transportation depended on people using buses and ride the subway, is that correct? How were those estimates derived? What assumptions were made that went into what the plan says about how many people will commute on some kind of transit vs how many people will drive? I work in the area and everybody I know drives their cars. Is there any evidence people working at this project site will actually use public transportation?

Response to Comment No. 189-2

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 regarding the effectiveness of TDM programs.

Comment Letter No. 190

Steve Friedman
455 N. Edinburgh Ave.
Los Angeles, CA 0048-2307

Comment No. 190-1

Why is the City planning a large entrance on the Grove Drive? It's the narrowest street around the project site. The Grove Drive serves as the access for the apartments, post office and the Grove. There's NO studio car access on it now. It should stay that way—no studio cars or trucks on Grove Dr! Why would you put all that studio traffic and production trucks right next to the park, museum and residences? Why would you want to make it nearly impossible to access the apartment building?. [sic] The Draft EIR shows that the street will be clogged up and backup in front of the apt driveways. Why would you want to make it hard for people to access the retail stores—do you want to completely kill brick & mortar shops? This is just poor planning. From a quick look at the project plans it's clear that only about 15% of the Television City property fronts the Grove Drive. It makes no sense to make that the main entrance for all the cars and trucks and direct most of the traffic through the Grove Drive. And it's not like those cars and trucks don't already have to go on Fairfax, Beverly and 3rd Street—there's no other way to get to Grove Drive. The access and circulation for this project needs to be redone and any access from the Grove Drive be more in line with the extent to which this property actual fronts the Grove Dr.

Response to Comment No. 190-1

The traffic capacity analyses presented in Table 18 on page 162 of the Project's Transportation Assessment (Appendix M.1 of the Draft EIR) showed that The Grove Drive had more available capacity than either Fairfax Avenue or Beverly Boulevard and has capacity for the Project trips. The Grove Drive is classified as a Collector Street in the Mobility Plan and "collecting" trips from a commercial development and taking those trips to the arterial street system is the proper function of a Collector Street. See Topical Response No. 12, Safety and Congestion, regarding access and use of The Grove Drive.

Comment Letter No. 191

Josh Frieman
321 S. Burnside Ave.
Los Angeles, CA 90036-3269

Comment No. 191-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 191-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 192

David Frishberg
118 S. Laurel Ave.
Los Angeles, CA 90048-3514

Comment No. 192-1

Having lived in the neighborhood for 15 years, I can attest that traffic and parking are already a problem.

Response to Comment No. 192-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 192-2 through 192-4.

Comment No. 192-2

But the Draft Environmental Impact Reports traffic section (83 pages!) is very confusing: Is the EIR really saying that an average employee only commutes 6.7 miles per day (buried on page 75 of the traffic section).

Response to Comment No. 192-2

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths and the provision of empirical data in support of the subject analysis. As substantiated therein, the approach to, and assumptions for, using the City's VMT Calculator tool to analyze the Project's VMT impacts were appropriate, as acknowledged by LADOT in the Assessment Letter that is presented in Appendix M.2 of the Draft EIR.

Comment No. 192-3

Do the people who wrote this actually live in LA? That is completely unrealistic. People commute to work here from Santa Clarita, the San Fernando Valley and Orange County every day—has the City asked people at the existing study where they travel from?

Response to Comment No. 192-3

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 192-4

More broadly, the project description does not describe what will actually be built. It presents a set of almost an unlimited number of development options, none of which may actually be constructed. But the community has no idea of what will actually be built and has no way to evaluate the impacts of the project.

Response to Comment No. 192-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-12 with regard to the Project Description and proposed Specific Plan, the proposed development program that was analyzed in the Draft EIR, and the regulatory framework under the proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. See also Topical Response No. 3, Permitted On-Site Uses, with regard to the uses that would be permitted in the proposed Specific Plan, which were fully disclosed and analyzed in the EIR.

Comment No. 192-5

Please provide a clear and definite development program so we can understand the project and its impacts.

Response to Comment No. 192-5

A clear development program for the Project is discussed in page II-12 through page II-17 of Section II, Project Description, of the Draft EIR and the potential impacts are discussed throughout Section IV of the Draft EIR. In addition, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment Letter No. 193

Kim Funaro
10831 Fruitland Dr.
Studio City, CA 91604-3550

Comment No. 193-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 193-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 194

G. A.

Comment No. 194-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 194-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 194-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 194-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 194-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 194-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 194-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 194-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 194-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 194-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 194-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 194-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 194-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 194-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 195

Eduardo Gallardo
320 S. Clark Dr., Apt. 304
Los Angeles, CA 90048-3230

Comment No. 195-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 195-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 196

Shavinder Galtere
8137 Blackburn Ave.
Los Angeles, CA 90048-4423

Comment No. 196-1

This letter is in reference to the TVC 2050 project. After reading the Transportation Assessment of the Draft Environmental Impact Analysis, I have questions about the public amenities that the applicant mentions in the project design features. In the subsection of Project Design Feature TR-PDF-2, the applicant states that the project “will incorporate features for pedestrians such as landscaping improvements, exclusive access points, upgraded pedestrian facilities, and bus stops”. [sic] Are those the only “features” being planned? How was it decided to include those features? Were other features considered but won’t be used?

Will these upgraded pedestrian features be incorporated during the construction process of the project? If not, why not? Are they planned to be incorporated after construction is finished? Or will some of them be part of the construction process, while others will be added later? What benefits are those features supposed to offer? Will installing them result in other impacts that actually are harmful, such as blocking sidewalks for long periods of time making them unusable while being put in?

For many who live in the Beverly Fairfax area, unrestricted pedestrian access is a critical point. There is a large Orthodox Jewish community in the area and on the Jewish Shabbat, many Jews do walk only get to synagogue. This, in practice, means that there are many groups of families walking to their synagogues on Fridays (and during other yamim tovim). When will these upgrades be made, what time of day and what days? How will they impact those who regularly walk on our area sidewalks and don’t drive at all? Where have the impacts been considered?. [sic]

Response to Comment No. 196-1

Refer to Response to Comment Nos. 16-72 and 16-76 regarding sidewalk widths and consistency with the Mobility Plan.

If construction requires the temporary closure of a section of a public sidewalk, a temporary alternate sidewalk will be provided. Accordingly, access to public sidewalks would be maintained at all times and would not affect pedestrian activities in the Project area. Refer to Topical Response No. 12, Safety and Congestion, and Response to

Comment Nos. 16-72 and 26-E.4-3 regarding the Project's public realm improvements and pedestrian safety and access.

The pedestrian features that are included as PDFs will be enforced through their inclusion in the Mitigation Monitoring Program, which is included as Section IV of this Final EIR. The Mitigation Monitoring Program also lists the timing for these improvements.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 196-2

Additionally in the introductory paragraph of the Project Design Feature section, it says that the features proposed in the document "are not required to reduce any significant transportation impact resulting from the project". [sic] What does this mean exactly? So features to improve some of the design aspects have no relation to reducing the many significant transportation impacts that will come from the project? That is like saying the applicant will incorporate an exclusive access point for pedestrians but he is not required to have that feature help to reduce the serious traffic impacts we can expect from the project, is that right?

Response to Comment No. 196-2

PDFs are commitments by the Applicant to include certain elements in the Project. They are not intended to mitigate impacts but are beneficial features above regulatory requirements. PDFs are fully enforceable and included in Section IV, Mitigation Monitoring Program, of this Final EIR. Refer to Response to Comment No. 9-34 for further discussion.

Comment Letter No. 197

Miguel Gamboa
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 197-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 197-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 198

Diana Gamez
13540 Flomar Dr.
Whittier, CA 90605-2230

Comment No. 198-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 198-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 199

Ann Gaskin
628 N. Laurel Ave.
Los Angeles, CA 90048-2321

Comment No. 199-1

Thank you for the opportunity to express my opinion as a resident of the Beverly Fairfax neighborhood. I am concerned about the proposed expansion of Television City.

Response to Comment No. 199-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 199-2

This is a historic area, and we are proud of and need to honor that history. Television City has been around a long time, and while it is true that production technology has changed, that doesn't mean a huge new office building needs to be constructed in this neighborhood. Stages can be upgraded without enlarging them. This addition is unnecessary and unacceptable as proposed. It is important to preserve the integrity of this iconic landmark in our community.

Response to Comment No. 199-2

As demonstrated by the analysis included in Section IV.B, Cultural Resources, of the Draft EIR, the integrity of the Primary Studio Complex would be retained with implementation of the Project and the Project would not result in significant impacts associated with historical resources. Also refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-46 regarding the rehabilitation and preservation of the integrity of the Primary Studio Complex. Refer also to Section D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding how the Project would not diminish the integrity of the Primary Studio Complex.

As discussed in Response to Comment No. 110-3, the rise of digital media has created the need for larger and taller sound stage volumes as well as enhanced technological infrastructure and production office, and the studio ecosystem requires office

to be located close to sound stages and production support. The industry has changed and become more digitized which requires much more office space co-located on a campus setting than traditional studios. The proposed development program includes an operationally feasible balance of studio uses to meet modern production needs. The comments regarding the need for office buildings and the enlargement of sound stages do not raise any environmental issues under CEQA, and no further response is required. However, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 199-3

Does the developer of this proposed monstrosity believe that new office space is going to benefit the community? Also, bringing more audience members to the site is not what my neighbors and I want. What we need is housing and to protect the fabric of this wonderful community, neither of which will happen with the addition of this development.

Response to Comment No. 199-3

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment No. 199-4

Thank you for your attention. Please do not allow this change to our community.

Response to Comment No. 199-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 199-2 and 199-3.

Comment Letter No. 200

Henry Geller
344 N. Ogden Dr.
Los Angeles, CA 90036-2144

Comment No. 200-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 200-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 200-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 200-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 200-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 200-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 200-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 200-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 200-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 200-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 200-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 200-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 200-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies

exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 200-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 201

Karen Gerst
kgerst@earthlink.net

Comment No. 201-1

Please don't allow this massive project to move forward. It is a bad idea for a busy neighborhood that brings community members, Angelenos and tourists together to enjoy the Farmer's Market and the Grove.

Response to Comment No. 201-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 201-2 through 201-7.

Comment No. 201-2

The traffic will be horrendous during the construction and afterwards. This megamonstrousity [sic] will clog the streets with commuting employees who most likely will never be able to live in the area.

Response to Comment No. 201-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 201-3

I'm sure there are more appropriate locations where TVC can build studios. In fact, the company does own other studio locations that might be a better fit for expansion and less disruptive to an already busy neighborhood.

Response to Comment No. 201-3

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the range of alternatives selected and why an alternative site alternative was deemed infeasible.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 201-4

In addition, Television City is an historic structure with unique charm that should be protected.

Response to Comment No. 201-4

The historical resource on-site would be preserved as part of the Project. Potential impacts to historical resources are discussed on pages IV.B-41 through IV.B-55 of Section IV.B, Cultural Resources, of the Draft EIR. As demonstrated therein, impacts would be less than significant. Refer also to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, with regard to how this historic structure will be protected.

Comment No. 201-5

With all the new studios being built, is there really a need for this project?

Response to Comment No. 201-5

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 201-6

The idea of building so many offices on-site seems crazy when the work-from-home trend will likely continue.

Response to Comment No. 201-6

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 201-7

What we really need is housing.

Response to Comment No. 201-7

Refer to Response to Comment No. 159-4.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 201-8

Please put your efforts towards what L.A. needs and not what a corporation wants to build its brand and make more money.

Response to Comment No. 201-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 201-2 through 201-7.

Comment Letter No. 202

Ewing Gillespy
341 Fuller Ave.
Los Angeles, CA 90036-2522

Comment No. 202-1

This project is expected to bring in close to 7,000 new workers regularly and countless other tourists, increasing traffic and congestion and making it harder for us to stroll pleasantly with our family.

Response to Comment No. 202-1

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The Project is a studio project and, given the security needs of a studio, will not be open to the public. Therefore, the comment regarding tourists is incorrect. Audience members will visit the Project Site and these trips, along with the trips generated by the anticipated 7,832 employees and other visitor trips, have been accounted for in the Project transportation analysis (refer to Topical Response No. 10, Trip Generation).

Refer to Topical Response No. 12, Safety and Congestion. Refer to Response to Comment No. 16-72 for a discussion of the Project's pedestrian-oriented design.

Comment No. 202-2

Rena and I have lived here for over 30 years; the Grove was built the year we moved.

Response to Comment No. 202-2

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 202-3

What is the city going to do about ensuring the enjoyment of our community is not altered dramatically? There must be measures that will be taken because there is no way we won't be impacted? Is the city basically saying to the residents of our wonderful community too bad, we just have to live with the impacts?

Response to Comment No. 202-3

All feasible mitigation measures have been incorporated into the Project in accordance with CEQA. The mitigation measures included in the Project are discussed in Section I, Executive Summary, of the Draft EIR; each respective section of the Draft EIR; and Section IV, Mitigation Monitoring Program, of this Final EIR. As discussed in Section VI, Other CEQA Considerations, of the Draft EIR, while the Project would have significant and unavoidable impacts with regard to construction-related regional emissions, noise, and vibration, such impacts would only occur during temporary and periodic construction activities, similar to those occurring at other development sites in urban areas, particularly within infill locations. As such, the benefits of the Project would outweigh the effects of its temporary significant and unavoidable impacts.

Comment No. 202-4

What about the increased risk that safety in our neighborhood will be compromised, where walking is a major part of what goes on there?

Response to Comment No. 202-4

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 202-5

In the years that the project is being built, there will be sidewalk closures and other pedestrian obstacles, according to the EIR's transportation section. I want to know which sidewalks will be closed and for how long, given the pedestrian aspect of our community and culture? The community's ability to get to the synagogue and other significant cultural events can be severely hampered by the closure of a sidewalk.

Response to Comment No. 202-5

There is no plan for any long-term sidewalk closures as part of the construction process. As discussed in the Draft EIR, there are some utility upgrades that will require new or revised connections between the Project Site and utilities that currently run under the streets. For these connections, sidewalks would have to be closed temporarily, but the CTMP prepared pursuant to Project Design Feature TR-PDF-1 would require that temporary sidewalks be provided to maintain pedestrian access past the Project Site.

Comment No. 202-6

I'm hoping that the City would consider how the project will affect our lives, our cultural history, and our safety before making a decision. Please inform me of any city actions about this project.

Response to Comment No. 202-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 202-2 through 202-5. All commenters are added to the notification list for the Project.

Comment Letter No. 203

Jane Gilman
janelarch@icloud.com

Comment No. 203-1

I am writing to express my concerns about the mammoth Television City 2050 Project.

Response to Comment No. 203-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 203-2 through 203-3.

Comment No. 203-2

The magnitude of the project would overwhelm the surrounding community with its two million square feet of development and 1.4 million square feet of offices. This represents an enormous increase from the current site.

Response to Comment No. 203-2

This comment is substantively similar to Comment No. 172-3. Refer to Response to Comment No. 172-3 regarding the size of the Project. This comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 203-3

This expansion will bring traffic, gridlock, and more cars into neighborhood streets than we have ever experienced.

Response to Comment No. 203-3

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis. Refer to Topical Response No. 10, Trip Generation, for information regarding Project trips.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for a discussion of the non-CEQA cut-through analysis and proposed NTMP.

Comment No. 203-4

The Planning Department's goal should be in preserving and enhancing neighborhoods. This is not the right project for this community. Please work with our neighbors and the developers to come up with a reduced version of the present plan.

Response to Comment No. 203-4

This comment, which concludes the comment letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 204

Chana Ginsberg
145 N. Fuller Ave.
Los Angeles, CA 90036-2811

Comment No. 204-1

This letter is in reference to the TVC 2050 project and how the project would affect the historical resources around the studio. This project has to adhere to the California Environmental Quality Act (CEQA), and under CEQA this project has to determine that the proposed project would not have a “significant effect” on the environment and to historical or archaeological resources of the site. A significant effect is defined as “if a project results in a substantial adverse change in the significance of a historical resource.” CEQA defines a substantial adverse change as the “physical demolition, distraction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired”. [sic] First, it seems the entire project will have impacts that will cause impairment to the significance of the iconic, historic CBS studios. Even if the developer is required to protect one part that is the Historic Cultural designation, how can it be acceptable to dramatically alter all of the surrounding portions of the site? How does a monstrous, modern development still protect what earned the designation back in 2018? Please explain how this could be considered by the city?

Response to Comment No. 204-1

As discussed in Response to Comment No. 28-29, the Draft EIR fully and adequately analyzed potential impacts to historical resources in the Project Site vicinity based upon the thresholds in Appendix G of the CEQA Guidelines, and concluded that impacts to the Primary Studio Complex would be less than significant.

Refer to Sections A, Existing Evaluation and Designation of the Primary Studio Complex, B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, as well as Response to Comment Nos. 26-46, 26-E.2-2, and 26-E.2-6 regarding the Draft EIR’s analysis of impacts from new construction adjacent to the Primary Studio Complex and buildout of the Project and the rehabilitation and preservation of the integrity of the Primary Studio Complex.

Refer to Response to Comment Nos. 5-13, 11-3 26-7, and 209-3 regarding the size of the Project.

Comment No. 204-2

As well, what about the indirect impacts of this project on the other adjacent historic resources in the area? The report recognizes the Beverly Fairfax district as a historic one, categorized both by its association with Los Angeles' Jewish population and the area's collection of earlier styles of architecture. However, the developer claims that "existing and future development within the project site does not have the potential to directly or indirectly impact the Beverly Fairfax Historic District...". [sic] How can that claim be true when the only thing separating television city from the Beverly-Fairfax historic district is Beverly Boulevard itself and when all of the streets that make up the historic district are part of the neighborhood which will be impacted so much by the increased traffic, parking on our neighborhood streets, drivers using our streets, and other effects?

The only thing separating the historic district from Television City is one 4-lane road. Given the huge size of the project, and years of construction, sidewalk blocks, road closures, and drilling, it is hard to believe that there will be no potential indirect impacts on the historic district which starts only a street away. Does the city plan to implement any barrier to protect the historic district? If there is substantial damage to the historic district, how will the city correct any mistakes?

As a resident of 25 years this area has a robust Jewish population, and weekly during the Shabbat, many families walk using Beverly Boulevard and the Beverly-Fairfax district to go to their services. Many Orthodox families do not use any electrical devices on the Shabbat and will simply walk or bike to the synagogues in the area. How would sidewalk blocks, road closures, and drilling not affect synagogue-goers? You must consider how the neighborhood's historical significance has been associated with the Jewish traditions of generations of people that have lived in this district. Has this been seriously considered? Where? Wouldn't all these impediments to accessibility not only impact the residents of the district but have a "substantial adverse change" to the historical significance that led the Beverly-Fairfax to be recognized in the National Register, to begin with?

Awaiting a response.

Response to Comment No. 204-2

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Draft EIR's analysis of potential impacts to historical resources in the vicinity of the Project Site, including impacts to the Beverly Fairfax Historic District. Also refer to Response to Comment Nos. 26-E.2-10 and 43-2 regarding the Beverly Fairfax Historic District. As discussed therein, the Beverly Fairfax Historic District does not include any parcels on Beverly Boulevard directly across the street from the Project Site, and therefore it is not located within the Project Site Vicinity

for the purposes of the historical resources analysis, as discussed in the Historic Report (Appendix C.1 of the Draft EIR) and Section IV.B, Cultural Resources, of the Draft EIR. More importantly, existing and future development within the Project Site do not have the potential to directly or indirectly impact the Beverly Fairfax Historic District due to the distance between the Beverly Fairfax Historic District and the Project Site. Nevertheless, for informational purposes, a discussion of the Beverly Fairfax Historic District is included on page IV.B-31 of the Draft EIR and pages 41 to 42 of the Historic Report.

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10, historic impacts and transportation impacts are analyzed separately and have different thresholds. The comment provides no explanation as to how increased trips through the Beverly Fairfax Historic District, sidewalk blocks, road closures, drilling or barriers/accessibility might translate to physical demolition, destruction, relocation, or alteration such that the significance of the Beverly Fairfax Historic District would be materially impaired, which is the threshold for significant impacts on historical resources in Appendix G of the CEQA Guidelines.

There is no plan for any long-term sidewalk closures as part of the construction process. There are some utility upgrades that will require new or revised connections between the Project Site and utilities that currently run under the streets. For these connections, sidewalks would have to be closed temporarily, but the CTMP prepared pursuant to Project Design Feature TR-PDF-1 would require that temporary sidewalks be provided to maintain pedestrian access past the Project Site.

Refer to Response to Comment Nos. 5-13, 11-3 26-7, and 209-3 regarding the size of the Project.

Also note that the EIR is the independent analysis and determination of the City, not the Applicant.

Comment Letter No. 205

Deborah Glass
8261 W. Fourth St.
Los Angeles, CA 90048-4401

Comment No. 205-1

Mr. Caporaso, I am concerned about the effect this project will have on L.A.'s cultural and historic landmarks. Given the importance of the Holocaust Museum to our city, how could you build a 130 foot tall parking structure with 5,000 cars right across the street where thousands of children come every year? How will the school buses be able to drop children off to visit the Holocaust Museum when you are adding thousands of cars to Grove Drive?

Response to Comment No. 205-1

This comment is substantially similar to Comment No. 41-4. Refer to Response to Comment No. 41-4, above.

Comment No. 205-2

This project will overwhelm the Adobe, one of the most important structures in the region dating back to the 1800s. Not only will a 20-story building, as permitted by the project, ruin the feel of the adobe, but construction near the historic structure could badly damage it—there should be a complete analysis of the vibration impacts to the adobe.

Response to Comment No. 205-2

The assertion that construction activity would “badly damage” the Gilmore Adobe is the opinion of the commenter and is not supported by the evidence. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13, 28-29, and 363-1 regarding the Draft EIR’s analysis of impacts to the Gilmore Adobe. As discussed therein, the visibility of a new building, structure, or feature from various vantage points alone would not result in a significant impact to the Gilmore Adobe. For a significant impact to occur, the integrity of the historical resource would have to be diminished to the degree that it would no longer be able to convey its significance. The Draft EIR and Historic Report (Appendix C.1 of the Draft EIR) correctly considered the impact the Project could have on the integrity of the Gilmore Adobe, including its integrity of *setting*, and concluded that any impacts would be less than significant (refer to Draft EIR page IV.B-55 and Historic Report pages 87–88).

This comment does not provide any explanation as to what aspects of the immediate surroundings are instrumental in conveying the historic significance of this historical resource or how new construction located north of the Gilmore Adobe would diminish its integrity. As demonstrated in the Draft EIR, the Gilmore Adobe, including its component buildings, structures and associated outdoor spaces, would remain physically unchanged after implementation of the Project and it would continue to convey its historic significance. Therefore, impacts to the Gilmore Adobe would be less than significant as defined by CEQA.

In addition, page IV.I-60 of Section IV.I, Noise, of the Draft EIR evaluates potential vibration impacts to the Gilmore Adobe associated with construction of the Project and concludes that no significant impacts would occur. Also refer to Response to Comment No. 363-2 regarding construction vibration in the vicinity of the Gilmore Adobe.

Refer to Response to Comment No. 5-13 regarding the height limits under the proposed Specific Plan in relation to the Gilmore Adobe.

Comment Letter No. 206

Spencer Glesby
333 1/2 N. Ogden Dr.
Los Angeles, CA 90036-2137

Comment No. 206-1

How did this project ever get a green light from the city?

Response to Comment No. 206-1

The Project has not been approved by the City. Following publication of the Final EIR, the Project will be considered at public hearings and meetings before City decision-makers.

Comment No. 206-2

It seems appalling that our community is expected to deal with constant construction, thousands of trucks and cars, parking and traffic gridlock, air pollution, and noise and light pollution for a duration of 3 to 20 years.

Response to Comment No. 206-2

With respect to traffic and parking, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. In addition, while parking impacts are also no longer CEQA impacts under SB 743, in accordance with the CTMP (refer to Project Design Feature TR-PDF-1 on page IV.K-36 of the Draft EIR), Project construction workers would be prohibited from parking on adjacent streets or in predominantly residentially zoned areas.

It is unclear what pollution the commenter is referring to, but air pollution is analyzed in Section IV.A, Air Quality, of the Draft EIR. As demonstrated therein, no localized air quality impacts would occur as a result of construction or operation of the Project.

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise. Construction noise impacts were comprehensively analyzed in Section IV.I, Noise, of the Draft EIR; refer to pages IV.I-35 to IV.I-43 therein.

With regard to lighting, refer to Response to Comment No. 26-E.1-76 regarding how based on SB 743 aesthetic impacts of the Project (including those related to lighting) are determined to be less than significant.

Comment No. 206-3

I want each year laid out with number of trips and vehicles per month.

Response to Comment No. 206-3

It is impossible to respond to this comment because the construction plan for the Project has not been developed to this level of detail. Instead, the Transportation Assessment (Appendix M.1 of the Draft EIR) on pages 180–182 details the truck and auto trips during the two busiest construction phases of the Project. The level of detail requested in the comment would be developed as part of the CTMP prepared before each major construction phase of the Project. Refer to Response to Comment No. 162-2 regarding the construction assessment included in Appendix M.1, Transportation Assessment, of the Draft EIR. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Comment No. 206-4

I am totally opposed.

Response to Comment No. 206-4

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 207

Carmella and Deborah Glezer
419 N. Sweetzer Ave.
Los Angeles, CA 90048-2603

Comment No. 207-1

Having lived in the neighborhood for 38 years, we are totally opposed to this project [sic]

Response to Comment No. 207-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 207-2

It is completely outrageous that the residents are expected to meekly accept 20 years of construction, noise, traffic disruptions and pollution, so that the developer can build a massive studio.

Response to Comment No. 207-2

First, construction of the Project is not expected to take 20 years. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Refer to Response to Comment No. 162-2 regarding the construction assessment included in Appendix M.1, Transportation Assessment, of the Draft EIR. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Under SB 743, traffic congestion is not a CEQA consideration. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Air quality and noise analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively.

Comment No. 207-3

The City should care about the health and welfare of its residents, not whether the developer's investments achieve their anticipated return.

Response to Comment No. 207-3

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective.

Comment No. 207-4

The EIR wildly understates the project's impacts on people's lives—the analysis needs to be redone and recirculated.

Response to Comment No. 207-4

Refer to Response to Comment Nos. 207-2 and 207-3. As demonstrated therein, the Draft EIR has been completed in accordance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 208

Bruce Gold
P.O. Box 1656
Studio City, CA 91614-0656

Comment No. 208-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 208-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 209

Joel Gold
530 N. Fuller Ave.
Los Angeles, CA 90036-1941

Comment No. 209-1

I hope you will seriously reconsider the proposed Television City expansion project. I have been a resident here for 5 years, I have many concerns about this project, Emissions? Traffic? Parking? 20 years of construction? The EIR is confusing and incomplete. There are so many concerns with this proposed huge facility for a neighborhood that is historic. Please address these issues not explained in the EIR.

Response to Comment No. 209-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 209-2 through 209-3. As demonstrated therein, all of the issues raised by the commenter are addressed in the Draft EIR.

Comment No. 209-2

The Television City proposes improvements that will increase the height of some buildings by many stories. How will 20-story buildings appear behind our Farmer's Market and the Avila Adobe? The adobe has historical significance and has been around since 1818. How will the developer protect it from damage during all the construction? How close will the construction be to the edges of the adobe and market property? How will the increased traffic impact business at the Farmer's Market?

Response to Comment No. 209-2

It is assumed that the commenter is referring to the Gilmore Adobe and not the "Avila Adobe." Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13, 28-29, and 363-1 regarding the Draft EIR's analysis of impacts to The Original Farmers Market and Gilmore Adobe. As discussed therein, impacts to The Original Farmers Market and Gilmore Adobe would be less than significant.

Regarding the comment about damage to the Gilmore Adobe from construction, refer to Response to Comment Nos. 26-139 and 363-2 regarding how construction of the Project would not generate vibration that would result in damage to the Gilmore Adobe.

As discussed in Response to Comment No. 5-13, the nearest buildings within the Project Site would be located approximately 167 feet from the Gilmore Adobe building, and the nearest construction activities within the Project Site would be approximately 125 feet from the Gilmore Adobe. In addition, The Original Farmers Market is located approximately 640 feet from the property line and approximately 670 feet from new construction.

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-47, historic impacts and transportation impacts are analyzed separately and have different thresholds and no substantial evidence has been presented to demonstrate that traffic would result in impacts to a historical resource. In addition, construction and operation of the Project would not affect physical access to The Original Farmers Market. Furthermore, as discussed in Topical Response No. 13, Parking, the Project would not result in spillover parking and as such would not affect parking at The Original Farmers Market. Nonetheless, it should be noted that under CEQA, impact to a business is not an environmental topic that needs to be addressed.

Comment No. 209-3

Also, it seems those tall buildings even fit into the neighborhood, was this even considered? The drawings show a mammoth sized complex. How could that kind of development fit into our community? What will happen to any views that residents in apartments have now?

Response to Comment No. 209-3

Refer to Response to Comment Nos. 11-3, 26-7, and 172-3 regarding the height of the Project, including with respect to surrounding uses.

The remainder of the comment discusses information related to aesthetic impacts (views). As described in Section 4.I on pages 30–31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact,” unless evaluation is required under other land use regulations in the LAMC. An evaluation of aesthetic impacts is not required under the LAMC. As such, no further

analysis was required in the Draft EIR for this topic. Nevertheless, the Initial Study included a discussion of aesthetic impacts for informational purposes. Refer to pages 32–40 of the Initial Study, in particular the discussion of scenic views on pages 32–36. As discussed therein, the Project would not have a substantial adverse effect on a publicly available scenic vista. However, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 209-4

With construction, residents need to know the schedule. How is the project construction going to be mapped out? Neighbors need to know the phases of the project, so please provide a plan.

During construction there will be so many trucks, coming and going. Why is the route for this traffic pattern not confirmed already?

Response to Comment No. 209-4

Regarding the Project timeline, refer to Response to Comment No. 9-24.

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction traffic impacts and Response to Comment Nos. 9-22, 107-2, and 124-6 regarding construction haul routes. As discussed therein, three routes were selected to comprehensively analyze the potential haul routes and ensure all associated environmental impacts were evaluated in the Draft EIR. Refer also to Response to Comment No. 73-2 regarding the proposed CTMP which includes street closure information, a detour plan, haul routes, and a staging plan.

Comment No. 209-5

The digging required for this project will impact the groundwater. How will the nearby homes and businesses be affected by this change in the ground? Will foundations be shifted due to subsidence? Have the potentially affected owners of property been notified of these groundwater issues?

Response to Comment No. 209-5

Refer to Response to Comment Nos. 11-25 16-74, 16-85, and 26-69 for further discussion regarding settlement and subsidence effects. As described in the Dewatering Report in Appendix FEIR-13 of this Final EIR, impacts related to subsidence would be less than significant.

With regard to outreach, refer to Response to Comment No. 28-13.

Comment No. 209-6

Has the developer partnered with the LA Conservancy in this development? It seems there has been a settlement of some kind. What is this settlement, and is it included in the EIR? Why does the LA Conservancy speak for our community? How does the settlement agreement affect the goals of the expansion project? How can the community know the limitations agreed to if it is not available to the public?

Response to Comment No. 209-6

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

Comment No. 209-7

In the EIR, the Vehicle Miles Travelled analysis is difficult to understand. Please explain what vehicle miles travelled is and why is that used rather than number of cars and number of trips. The distance people drive in LA is greater than the averages you used; when are you going to correct those mileage numbers? The information does not seem to align with what are the typical transportation modes of Angelenos. For example, the VMT analysis makes assumptions about people traveling via public transportation, but most people's experience says otherwise. What data was used to create the analysis? If it showed a high percentage of people travelling via bus and metro, etc., then please provide that data.

Response to Comment No. 209-7

VMT is the combination of the number of vehicle trips and travel distance per trip. As a simple example, 10 vehicle trips with a travel distance of 8 miles per trip would result in a total VMT of 80. The assessment of VMT impacts typically focuses on the work VMT per capita, such as in the evaluation of the Project, where impacts are measured in terms of work VMT per employee. The evaluation of work VMT per employee takes into account the travel mode of each employee. For example, if there are 10 employees each of which has a travel distance of 8 miles between home and work, and six of the employees drove alone while the other four employees used an alternative mode of transportation, such as taking public transit, carpooling as a passenger with another employee, or walking/biking, the *average work VMT per employee* would be 4.8 (i.e., six employees that drove alone times 8 miles per trip equals 48 miles, divided by 10 total employees equals an average work VMT per employee of 4.8). Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. That topical response includes additional details and another example regarding how VMT per

employee is calculated, and also provides empirical data in support of the employee trip length assumptions used in the VMT analysis.

Regarding transit assumptions, refer to Topical Response No. 11, Transportation Demand Management Plan, and Response to Comment No. 107-4.

Comment Letter No. 210

Beth Goldberg
7974 W. Fourth St.
Los Angeles, CA 90048-4413

Comment No. 210-1

I am a long-time resident of the Beverly Fairfax community. I am also among those who would be most affected by the proposed changes to the CBS Television City property.

Response to Comment No. 210-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 210-2 through 210-4.

Comment No. 210-2

I spend almost two hours per day stuck in traffic in the community and Los Angeles. We all know it can at least 45 minutes just to get from the highway into the neighborhood at times during the day. Anyone driving north or south on Fairfax or coming over Beverly Blvd sits in traffic, trying to get through intersections and the line of bottlenecked cars. As of now, I will miss out on almost 153 days with my family over the next five years because of my commute.

Response to Comment No. 210-2

This comment discusses non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 210-3

This proposed expansion would only make this worse. Specifically, the DEIR states this project could take up to 20 years to complete. Imagine the time lost as a result of this project! I can't get these days, weeks, months, YEARS of my life back!

Response to Comment No. 210-3

Regarding the Project timeframe, refer to Response to Comment No. 9-24.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 210-4

To make matters worse, I don't even have the chance to fully understand the technicalities of this project. Why won't the city be holding a public hearing on the project? How can the city rationalize not having one? Wouldn't the city want to ensure that residents are truly informed? I want to learn more about this if I'm potentially going to be greatly affected by all of its impacts.

It's clear this project does not have the Beverly Fairfax community members centered in its plans. Apparently, there was a meeting in July 2021 where we could comment, but it was so poorly publicized that I, a relatively engaged neighbor, didn't know about it until August 2022.

My main concern is that if this project does take 20 years to complete, my kids will be adults by then, and I will have lost precious time with them because of the even longer time it will take me to get home from work every day. I would like to be able to learn more about it and have my voice heard. I'm not opposed to creating opportunity in my neighborhood. I am opposed to the city approving a project when there are impacts that cannot be mitigated; why should we accept devastating impacts on a community, its residents and businesses? And I'm opposed to letting developers significantly impact my life without having a real say during the process.

Response to Comment No. 210-4

The assertion that the City will not hold a public hearing on the Project is incorrect. Following publication of the Final EIR, the Project will be considered at public hearings and meetings before City decision-makers. Refer to Response to Comment No. 28-13

regarding public outreach and Response to Comment No. 32-3 regarding noticing and public hearings.

Comment No. 210-5

I'm urging you to reject this project. I don't want to lose more time due to developments that have already made LA what it is.

Response to Comment No. 210-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 211

Etti Goldstein
221 S. Alta Vista Blvd.
Los Angeles CA 90036-2821

Comment No. 211-1

I am submitting comments and questions about the plan to modernize and develop Television City.

Response to Comment No. 211-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 211-2

I have several questions about the extent of the excavation. The La Brea Tar Pits are very close by.

- *Will the excavation release gases into the environment? What gases are going to be released, and what is the city and the developer going to do about that risk? What about the effects to the public, to visitors, and to those who live in the area?*
- *Did the EIR study how much gas would be released? What were those findings? Where is that located?*

Response to Comment No. 211-2

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-87 with regard to the La Brea Tar Pits and methane and subsurface gases.

Comment No. 211-3

I am also really concerned this excavation will have a negative impact on the groundwater and drinking water.

- *Did you study the impact of any excavation on water? What was the result of that study?*

- *Will my property in the Beverly Fairfax neighborhood be impacted by removing groundwater?*
- *Will I be notified if my property is impacted? What will be done to ensure no damage to my property?*
- *How much groundwater will you be removing? Where will it be pumped to?*

Response to Comment No. 211-3

Refer to Response to Comment No. 3-7 regarding potential impacts to groundwater quality and potential usage of extracted groundwater, Response to Comment No. 11-5 regarding the quantity of groundwater to be extracted and additional information regarding compliance with discharge permits, and Response to Comment No. 26-69 regarding potential impacts to groundwater levels and associated subsidence. Refer to Response to Comment No. 16-64 for a summary of how the extracted groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal method.

Comment No. 211-4

I am also wondering why the EIR says that what is being planned for below ground is not part of the floor area? Construction and operations below ground will have impacts.

- *Can you define floor area in the context of this project? Why would basement and below ground areas not be considered floor space? That doesn't make any sense, but does sound as though it allows the developer to not disclose the impacts.*
- *What will the operation and construction impacts be from any buildings, area, and space that the EIR says are not considered part of the square footage?*

Response to Comment No. 211-4

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 with regard to the definition of floor area under the proposed Specific Plan. As discussed therein, the EIR's analysis accounted for the potential physical environmental impacts of all proposed uses, areas, and activities, regardless of whether they are considered to be within the definition of floor area, and no active production activities would be located in the parking and basecamp areas below Project Grade.

Comment No. 211-5

I look forward to reviewing your response.

Response to Comment No. 211-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 212

Kymn Goldstein
kymngoldstein@gmail.com

Comment No. 212-1

first of all thank you for everything you've done for our community over the years.

I've been a resident and homeowner of the Beverly Grove area since 1999. As a first time homeowner, I chose this place instead of a bigger property in the valley because of the richness and diversity of the community and area. I've benefited from the growth and been impacted by the changes that come with growth—quality of life, crime, lagging infrastructure.

While I wholeheartedly support well-planned projects that move our community and city forward, I do not support TVC 2050 in its current proposed scope.

Response to Comment No. 212-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 212-2 through 212-5.

Comment No. 212-2

Our neighborhood and quality of life will be negatively impacted by the size of this project and duration of the construction.

Response to Comment No. 212-2

Refer to Response to Comment No. 11-3 regarding the size of the Project. Refer to Response to Comment No. 9-24 regarding the construction timeline. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 212-3

It will impact Beverly Blvd which is already bumper-to-bumper most hours of the day.

Response to Comment No. 212-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, a project's CEQA transportation-related analysis and resulting impacts are assessed via VMT methodology. LOS methodology is no longer applicable for the purposes of identifying a project's CEQA transportation-related impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 212-4

The Regional Center designation is grossly inappropriate.

Response to Comment No. 212-4

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 212-5

We should have more time to review the draft EIR.

Response to Comment No. 212-5

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing and the extended public review period.

Comment No. 212-6

It's not accurate or fair for business interests to characterize resident concerns as being anti-progress. The CBS studio property is historic and special. That said, smart environment-conscious development is possible. This project as stated is not that.

Response to Comment No. 212-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 213

Zev Goldstein
122 N. Alta Vista Blvd.
Los Angeles, CA 90036-2826

Comment No. 213-1

I am writing with questions and concerns about the proposed TVC development plan. As a resident of the Beverly Fairfax area, I think the community deserves more transparency about what signage is going to stem from this project.

Response to Comment No. 213-1

Section II, Project Description, of the Draft EIR includes a detailed discussion of the proposed sign program. Refer to pages II-31 and II-32 of the Draft EIR.

Comment No. 213-2

I understand that Television City is an entertainment studio, but this does not discount the fact that LA is a residential area as well. I do not want advertisements to be all that I see when I walk out of my house. Where are billboards expected to be installed? I have read that living near a billboard can lower your home value. I am not okay with this. Can you please provide research on whether signage from this proposed project would affect surrounding home values? The EIR needs to disclose where the signs will be onsite and offsite. Please explain how these offsite signs won't be a disturbance to community members?

How many signs are there going to be? Does the city realize that using Television City's promotion for these billboards is going to take away from local businesses' marketing opportunities? If there are additional billboards built, has the city taken into consideration the safety hazards that accompany them? Will these be billboards that light up? If so, not only is this an environmental detriment, but also a major disturbance. Are they going to shine through our windows at late hours? This form of advertising can't be turned off and would be a constant distraction and annoyance. What messages are going to be put on the billboards? Will they be changing all the time?

Response to Comment No. 213-2

The EIR analyzed all physical elements of the proposed Sign District in accordance with CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-10 and 26-129 regarding the signage

proposed as part of the Project, how the components of the proposed Sign District were adequately described in the Draft EIR, and the availability of the proposed Sign District for public review although not required by CEQA or City policy. Please also see pages II-30 through II-32 in Section II, Project Description, of the Draft EIR regarding proposed signage and lighting for the Project.

Further, additional elaboration on technical signage typology is provided here for the commenter's edification. A billboard that displays any message directing attention to a business, product, service, profession, commodity, activity, event, person, institution or any other commercial message, which is generally conducted, sold, manufactured, produced, offered or occurs elsewhere than on the premises where the sign is located is an off-site sign. The Project does not propose and would not permit off-site signs in any manner.

A project's economic and social effects, including potential impacts on property values, are not effects on the environment under CEQA (see Section 15131(a) of the CEQA Guidelines). Although factors other than environmental impacts may be considered by the decision-makers, the purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Accordingly, CEQA does not require an analysis of project impacts on property values.

This comment also discusses a number of non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 213-3

Has the city even considered the environmental effects these billboards have? I read that one billboard uses the electricity to power 11 homes. This will be way too much electricity being consumed and way too much light pollution being distributed.

Response to Comment No. 213-3

Refer to Response to Comment No. 102-6 regarding energy usage for signage.

With respect to light pollution, pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts (including impacts with respect to lighting) shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.

Comment No. 213-4

Is it possible that the light from the billboards will impact wildlife such as birds and bats? What does that mean for our ecosystem?

Response to Comment No. 213-4

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described and analyzed in the Draft EIR. Please note that billboards would not be permitted under the proposed Sign District.

With regard to lighting impacts to wildlife associated with signage, the area surrounding the Project Site is fully developed and urbanized, and nighttime illumination is characteristic of most urban land uses, including the Project area. As discussed in Section I, Aesthetics, of the Initial Study (included in Appendix A of the Draft EIR), uses considered sensitive to nighttime lighting include, but are not limited to, natural (i.e., non-developed) areas. However, as discussed in Section IV, Biological Resources, of the Initial Study and in Response to Comment No. 26-E.1-68, the Project Site lacks habitat for special status species and is not located in or adjacent to a Biological Resource Area as defined by the City. Because wildlife species likely to occur on-site are those typically found in urbanized settings (i.e., small, common terrestrial and avian species), any lighted signage included in the Project would not adversely affect these species. Furthermore, the Project does not propose any billboards and illuminated signage would primarily be located within the Project Site interior. As discussed in Section I, Aesthetics, of the Initial Study included as Appendix A of the Draft EIR, illumination for Project signage would comply with the light intensities set forth in LAMC Section 93.0117 and would be directed towards the signs to avoid creating off-site glare.

Comment No. 213-5

Can you please provide the definition of an off-site sign? Is Sign District changing the usual definition? Where is the signage district plan? We need a full analysis of these issues. Is the city really willing to make LA a physical embodiment of an advertisement?

Response to Comment No. 213-5

Refer to Response to Comment No. 213-2 regarding the Project Description and proposed Sign District.

The proposed Sign District will not alter, change, or modify the definition of an “off-site” sign under the LAMC, and, as stated on page IV.H-31 of the Draft EIR, off-site signage would be prohibited within the proposed Sign District.

Comment Letter No. 214

Ethan Goodwin
353 1/2 N. Curson Ave.
Los Angeles, CA 90036-2365

Comment No. 214-1

Please address my concerns with the proposed Television City construction project. As a local, I want to know what is potentially going to be built and how it will change my neighborhood.

Response to Comment No. 214-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 214-2 through 214-4.

Comment No. 214-2

The site is right in the middle of a neighborhood with schools, religious organizations, museums and Pan Pacific Park. How will the increased car and truck traffic for construction and then the increased traffic for employees in the enlarged Television City impact the health of residents?, of the school children? and of visitors to the park? How will increased exhaust from diesel trucks negatively affect these people, particularly people at risk? What is the analysis of the impacts to the most at-risk populations such as children, people with asthma, seniors, and what were the conclusions? How many different at-risk groups live in this area? And how close are they to the project site?

Response to Comment No. 214-2

This comment is identical to Comment No. 127-4. Please refer to Response to Comment No. 127-4.

Comment No. 214-3

Another impact that needs to be further explained in the EIR is noise from all those trucks and from the construction itself. During construction, how much increased sound will occur? and what will be the impacts of the different sources of noise to the residents' and others' hearing? If construction takes two decades or more, how much does that increase the impact on people's hearing? How much does it impact quality of life? Construction noise is annoying at best and harmful at worst.

Response to Comment No. 214-3

This comment is substantively identical to Comment No. 127-5. Please refer to Response to Comment No. 127-5, above.

Comment No. 214-4

The Adobe and Farmers Market are true community landmarks and important to the community. How will the expansion of Television City affect the Adobe? During construction, it seems they would be impacted by construction noise, dust, and debris, so what will those impacts be? How much blasting, drilling, and other construction activity will there be to impact it? Won't visitor to the Farmers Market be impacted by the noise, traffic and daily construction? What steps are being taken to ensure the increased traffic and people coming into the area does not displace regular customers and visitors?

Response to Comment No. 214-4

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project would not impact off-site historical resources including The Original Farmers Market and the Gilmore Adobe.

Refer to Response to Comment No. 26-139 regarding how construction of the Project would not result in significant noise or vibration impacts to the Gilmore Adobe or The Original Farmers Market. Also refer to Response to Comment No. 363-2 regarding construction vibration in the vicinity of the Gilmore Adobe.

With regard to increased traffic during construction and the measures that would be taken to ensure adequate vehicular and pedestrian access in the area, refer to Topical Response No. 14, Construction Vehicle Impacts.

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-47, historic impacts and transportation impacts are analyzed separately and have different thresholds and no substantial evidence has been presented to demonstrate that traffic would result in impacts to a historical resource. In addition, construction and operation of the Project would not affect physical access to The Original Farmers Market. Furthermore, as discussed in Topical Response No. 13, Parking, the Project would not result in spillover parking and as such would not affect parking at The Original Farmers Market. Nonetheless, it should be noted that under CEQA, displacement of customers is not an environmental topic that needs to be addressed.

Comment No. 214-5

I understand there will be power generators at the basecamps. Since generators often run on diesel fuel, how will the pollution, both air and noise, be handled? How often will the generators be used? What will be they be used for? What about safety and hazard concerns?

Response to Comment No. 214-5

This comment is similar to Comment No. 188-4. Refer to Response to Comment No. 188-4. As discussed therein, during operation of the Project, emergency generators will be included for emergency use during a power outage and regularly tested for maintenance purposes but otherwise will not be used to provide power to the basecamps, which will be outfitted with electric tie-ins. As such, the routine operation of the Project would not result in noise from generators. Hazards and air quality impacts related to emergency generators are analyzed in Section IV.F, Hazards and Hazardous Materials, and Section IV.A, Air Quality, of the Draft EIR, respectively.

Comment No. 214-6

It seems irresponsible given the housing crisis that this huge expansion would not include residential development. Why did the developer choose not to include housing? Why isn't he required to include any housing, especially affordable housing? Is there a possibility to add it to the plan for development? Doesn't the city have a responsibility to offer more housing to workers given the need?

Response to Comment No. 214-6

This comment is identical to Comment No. 127-6. Refer to Response to Comment No. 127-6, above.

Comment Letter No. 215

Jerzy Gorczyca
jgorczyca@tvcityla.com

Comment No. 215-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 215-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 216

Marzena Gorczyca
marzena.gorczyca@yahoo.com

Comment No. 216-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Response to Comment No. 216-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 217

Patrick Gorman
536 N. Croft Ave.
Los Angeles, CA 90048-2511

Comment No. 217-1

The conceptual plan shows something like 100 big 18 wheeled trucks on the site—that seems like a massive transportation hub, and completely at odds with our community. Is that the maximum number permitted to be on site? If not, what is the total number of trucks permitted? Are the trucks all diesel? Will there be a gas station and a truck repair shop on site?

Response to Comment No. 217-1

Refer to Topical Response No. 14, Construction Vehicle Impacts, for the estimate of the construction trip generation and the busiest times for trucks. As shown therein, the heaviest truck usage would be during five days of the foundation pour when up to 500 concrete trucks could be on-site over the course of a day. Under no circumstances would there be 100 concrete trucks on-site simultaneously.

Likewise, Topical Response No. 10, Trip Generation, contains a discussion of Project truck trips during Project operations. When the Project is completed, the number of trucks per day is expected to be 83 of which only 18 would be semi-trucks. So, it is not likely that 100 18-wheelers would be parked or moving on the Project Site at one time.

There is no maximum number of trucks allowed on-site at any given time, but the numbers quoted above represent the experience of other studio and entertainment campuses.

As truck technology advances, fewer and fewer of the fleet would be diesel. Electric and natural gas-powered trucks will likely increase in terms of the proportion of the truck fleet.

The Project does not include a gas station or a truck repair shop, and these uses would not be permitted under the Specific Plan. The uses allowed under the proposed Specific Plan have been clarified in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Topical Response No. 3, Permitted On-Site Uses.

Comment No. 217-2

I'm also concerned about pollution. Will trucks be allowed to idle in our neighborhood and at the construction sites? Does the Air Quality analysis show the impacts of the trucks and diesel particulates in the community for years to come? This project needs to be reconsidered, from top to bottom.

Response to Comment No. 217-2

Refer to Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, of the Draft EIR, regarding emissions.

Refer to Response to Comment No. 126-2 regarding truck idling.

The third sentence of this comment is similar to that in Comment No. 87-1. Refer to Response to Comment No. 87-1. As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations. The HRA was conducted following conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population. All Project-related emission sources, including diesel-fueled emergency generators, were analyzed in the HRA. For detailed HRA modeling assumptions, refer to Appendix FEIR-10 of this Final EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 218

Lori Grapes
6684 Colgate Ave.
Los Angeles, CA 90048-4205

Comment No. 218-1

We're already experiencing unmitigated growth and nonstop traffic congestion. I'm concerned that moving on this new Television City Project application is too much, too fast.

Response to Comment No. 218-1

The comment is identical to Comment No. 67-1. Refer to Response to Comment No. 67-1, above.

Comment No. 218-2

We need more time to understand the long-term community and environmental impacts. A decision of this magnitude should be made with extreme caution and not rushed.

Our community should have time to review the information and provide appropriate feedback. The project will be so impactful to our neighborhood that residents and businesses should be given the opportunity to really understand what is being proposed. Why is there no public hearing scheduled to go along with the recent environmental report that came out? I'm respectfully asking you to delay approval and hold public hearings now, not later when the process is farther along.

Response to Comment No. 218-2

The comment is identical to Comment No. 67-2. Refer to Response to Comment No. 67-2, above.

Comment Letter No. 219

Tandi and Ethan Greenberg
461 N. Orange Grove Ave.
Los Angeles, CA 90036-1757

Comment No. 219-1

I heard that the “Mobility Hub” will be something like a bus depot—seriously? A studio is one thing, but a bus depot brings in constant noise and air pollution and random, transient people who might decide just to hang out in our neighborhood all day. Are there any rules that will control the Hub’s operations? Will the City oversee the usage long-term? There needs to be more information, analysis and rules around the whole mobility hub element.

Response to Comment No. 219-1

The Mobility Hub is not a bus depot. It is a purpose-built transfer center to be used by Project employees, visitors, and audience members to offer Project staff and visitors an alternate to driving to the Project. Mobility Hub functions would be located on-site to support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and to support other modes of travel and TDM strategies that are likely to evolve over time. These features would be promoted and incentivized through programs administered by an on-site TDM coordinator and one or more transportation information kiosks, including within the Mobility Hub itself. Refer to Topical Response No. 7, Mobility Hub, for more details on the function and the operation of the Mobility Hub.

Refer to Response to Comment No. 35-129 regarding the noise analysis associated with the Mobility Hub. As discussed therein, noise impacts associated with the Mobility Hub would be less than significant.

Refer to Response to Comment No. 26-E.1-28 for a discussion of the Mobility Hub and air quality. As discussed therein, the Mobility Hub is already accounted for in the air quality analysis.

Comment No. 219-2

But even aside from the Mobility Hub, building the project will require thousands of trucks, all using Beverly and on Grove Drive. Traffic gridlock is certain. And what happens if a truck carrying hazardous materials has an accident or catches on fire? How far away is the fire department? Has the EIR analyzed safety issues?

Response to Comment No. 219-2

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding the number of truck trips during Project operation.

Section IV.F, Hazards and Hazardous Materials, of the Draft EIR includes a detailed analysis of potential impacts associated with hazardous materials. As discussed therein beginning on page IV.F-35, Project impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

There are two LAFD Stations within the vicinity of the Project Site. The Primary Response Station would be Fire Station No. 61 located on 3rd Street, approximately 1.2 miles from the Project Site. A second station, which could provide support, is located on Gardner Street, approximately 2.2 miles away. Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding traffic safety and congestion and the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Thus, the EIR has adequately analyzed potential safety issues.

Comment Letter No. 220

Ron Greenwood
637 S. Dunsmuir Ave., Apt. 11
Los Angeles, CA 90036-5915

Comment No. 220-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 220-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 221

Leo Grifka
Grifka Group
Short Stories Hotel
115 S. Fairfax Ave.
Los Angeles, CA 90036-2106

Comment No. 221-1

I understand that the Draft Environmental Impact Report prepared by the City of Los Angeles, determined that there were no significant long-term operational environmental impacts associated with the proposed TVC 2050 project. However, the report did identify two short-term temporary impacts (1—air quality and 2—noise and vibration) during the construction phase. I believe that the proposed project has measures in place to minimize these impacts.

The following measures will be implemented to minimize air quality impacts during construction:

- Use clean diesel technology for off-road engines and equipment known as Tier 4
- Dampen areas onsite to suppress dust
- Suspend activities during high-wind periods
- Monitor the implementation of air quality-related measures through direct inspections, record reviews and compliance investigations

As well, the project will limit hours of construction and constrain construction activity within the project site boundaries to minimize noise and vibration issues. Temporary sound barriers will be installed along the project property lines, which I feel is extremely important along with haul trucks being routed away from residential streets when possible.

As a nearby property owner, I feel confident that these measures will minimize the environmental impacts. The jobs that this project will create, and the economic benefits far outweigh any negative impacts.

Response to Comment No. 221-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. A full list of mitigation measures

included in the Project is provided in Section I, Executive Summary, of the Draft EIR, pages I-29 through I-36.

Comment Letter No. 222

Sue Grishman
112 N. Hayworth Ave., Apt. 6
Los Angeles, CA 90048-3631

Comment No. 222-1

This project sounds like a nightmare—why wasn't the "specific plan" provided in the Draft EIR?

Response to Comment No. 222-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, all of the physical aspects of the Project that will be implemented by the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR in accordance with CEQA, and although neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 222-2

It's completely unclear what is going to be built, where, and when! How are people supposed to know what's to come re: traffic and parking and neighborhood disruptions and displacements, for the NEXT TWENTY YEARS??

Response to Comment No. 222-2

As discussed throughout the Draft EIR, the Project is the continuation and expansion of an existing studio use. Refer to Section II, Project Description, of the Draft EIR for a detailed description of the proposed development program. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

As described in Topical Response No. 14, Construction Vehicle Impacts, construction activity would not be constant for 20 years. The Draft EIR analyzes an approximately 32-month construction timeline, which would occur if the entire Project were

constructed in one phase. This is the preferred construction schedule by the Applicant. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 222-3

The Draft EIR should be recirculated with the proposed specific plan—otherwise we have no idea of what this project is.

Response to Comment No. 222-3

Refer to Response to Comment No. 222-1 regarding the Specific Plan.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 223

Kathy Gronau
448 N. Kilkea Dr.
Los Angeles, CA 90048-2229

Comment No. 223-1

I'm writing regarding the draft EIR for the CBS Television Studios project.

Response to Comment No. 223-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 223-2

The application says the project will use 6x the current water use. One of my priorities is water use and water supply. I am a strong proponent of water conservation. So what is the current water use of the existing facility? Will the project actually use 6x the amount of current consumption or is that what will be allowed? What will that amount of water be used for? Does that mean 6x the amount of water on an annual basis, on a monthly basis? Like what does that mean? Will there be any restrictions in place in case it turns out that all that planned new office, studio and stage space even more than 6x the amount?

Where is that water going to come from? Won't that affect the availability of water for other needs the city and the actual community here needs? What is the impact on water use? How is that use calculated and determined from the City's perspective?

Response to Comment No. 223-2

As stated on page IV.M.1-28 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the total existing demand at the Project Site is approximately 44,662 gpd. The EIR analyzed an estimated maximum new water demand of up to 302,424 gpd for the proposed studio-related uses, and anything beyond that would require further CEQA review and approval by the City. Refer to Response to Comment No. 16-66 with regard to the adequacy of water supply. Refer to Response to Comment No. 26-175 regarding the Project's water demand and impact analysis.

With regard to where the water supply for the Project would come from, as discussed on pages IV.M.1-15 to IV.M.1-27 in Section IV.M.1, Utilities and Service

Systems—Water Supply and Infrastructure, of the Draft EIR, water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, purchased water from MWD, and recycled water. LADWP pumps groundwater from the San Fernando Basin and, to a lesser extent, the Central Basin and Sylmar Basin. With regard to the types of water demand associated with the Project, such demand during construction would include, but would not be limited to, dust control, cleaning of equipment, and excavation and grading/recompaction activities. Water demand associated with operation would include that associated with the various uses on-site, including sound stages, production support, production office, general office, retail, basecamp, and the Mobility Hub, as well as landscaping, covered parking, and cooling towers.

Comment No. 223-3

What if the property uses change over time? How are those future potential impacts calculated since there are no specifics listed?

Response to Comment No. 223-3

The Draft EIR analyzed the proposed development program described in Section II, Project Description, of the Draft EIR (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). For each environmental topic, as applicable, in addition to analyzing the impacts of the proposed development program, the Draft EIR also analyzed the maximum impact scenario; i.e., the development scenario under the Land Use Exchange Program that would generate the greatest environmental impact. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Any substantial changes from the Project (including a proposal that involves a land use exchange) would be subject to further discretionary review and CEQA compliance review per the proposed Specific Plan.

Comment No. 223-4

What internal guidelines and policies will be put in place to keep track with the water usage? And who or what agency is responsible for monitoring it? Where will the information be posted for the community about how much water ultimately gets used?

Response to Comment No. 223-4

As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Project would be subject to state and local laws related to water conservation including, but not limited to, the CALGreen Code, California Plumbing Code, and the applicable provisions of the LAMC. In addition, the Project's voluntary commitments above code are included in the Project as Project Design Feature

WAT-PDF-1. Details regarding timing and enforcement of this measure are included in Section IV, Mitigation Monitoring Program, of this Final EIR.

With regard to water usage monitoring, LADWP monitors water usage within the City. The Project would implement water conservation features as required by applicable City Ordinances and Codes. Compliance with these requirements would be ensured as part of the City's plan check process. The Project would also implement additional specific water conservation commitments that were made to LADWP and are included as Project Design Feature WAT-PDF-1, which has been included as part of Section IV, Mitigation Monitoring Program, of this Final EIR. Water usage for private properties is not typically posted publicly.

Comment No. 223-5

How can the development be allowed to increase the amount of water usage that much during a drought? I'm wondering, what are the regulations that apply to water usage during a drought? It seems irresponsible that a development would be able to justify using so much water during a drought.

Response to Comment No. 223-5

Refer to page IV.M.1-14 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR for a discussion of the applicable regulations that apply to water usage, and to Response to Comment No. 16-66 with regard to the adequacy of water supply to serve the Project and the consideration of drought conditions.

Comment No. 223-6

What water conservation steps are going to be taken if this development even gets approved? Will those steps be ongoing?

Response to Comment No. 223-6

As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Project would implement all applicable water conservation measures required by City Ordinances and Codes through the life of the Project. In addition, the Project has committed to additional water conservation features above and beyond those required by the City as part of Project Design Feature WAT-PDF-1 that would be implemented for the life of the Project. These water conservation features include High-Efficiency Toilets with a flush volume of 1.1 gallons per flush or less; showerheads with a flow rate of 1.5 gallons per minute or less; ENERGY STAR—Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less; Drip/

Subsurface Irrigation (Micro-Irrigation); and Proper Hydro-Zoning/Zoned Irrigation (group plants with similar water requirements together).

Comment No. 223-7

Additionally, it looks like the project will extract groundwater during the construction. How will the property be impacted by groundwater extraction, and where on the property will that excavation be happening? Will the extraction cause sinking of the ground?

Response to Comment No. 223-7

Refer to Response to Comment No. 11-25 with regard to the quantity and location of dewatering that would occur and Response to Comment No. 26-69 regarding subsidence.

Comment No. 223-8

Thanks for responding to my questions.

Response to Comment No. 223-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 223-2 through 223-7.

Comment Letter No. 224

Meir Gul
429 N. Formosa Ave.
Los Angeles, CA 0036-2524

Comment No. 224-1

The Draft Environmental Impact Report says **any use in the C2 zones** will be permitted

But more than 100 uses are permitted in the C2 zone, including department stores, auditoriums that accommodate up to 3,000 people, museums, hotels, car washes, schools, circus, auto repair facilities, building material stores, hospitals, nursing facilities, medical laboratories, and dozens of different kinds of retail stores and other establishments.

Many of these uses and their related impacts have not been analyzed. Please provide an analysis of the potential impacts associated with this range of uses.

For example, what would the traffic impacts be if the project includes a hospital, with racing ambulances, huge staff rotating in and out throughout the day and nights, and an untold number of daily visitors?

I look forward to hearing from you.

Response to Comment No. 224-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan and Topical Response No. 3, Permitted On-Site Uses, with regard to the land uses that would be permitted in the proposed Specific Plan.

As discussed in Topical Response No. 3, the permitted uses are fully accounted for in the impact analyses in the EIR. Further, as discussed in Topical Response No. 1, the Draft EIR analyzed the proposed development program, as well as the maximum impact scenarios to account for the full range of impacts under the Project. As discussed therein, based on comments received in response to the Draft EIR, the list of permitted uses was clarified to reflect the studio objective of the Project, including, among other things, removing the C2 zone text referenced in this comment; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses—sound stage, production support, production office, general office, and retail—as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the EIR. The Project would not include department stores,

hotels, car washes, schools, circus, auto repair facilities, hospitals or medical laboratories, and such uses would not be permitted under the proposed Specific Plan. Refer to Response to Comment No. 28-6 for further discussion of the permitted uses. The proposed Specific Plan would permit up to 20,000 square feet of neighborhood-serving retail uses. Refer to Topical Response No. 1 regarding the regulatory process under the proposed Specific Plan. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Refer to Topical Response No. 10, Trip Generation, regarding the visitor trips that were accounted for in the EIR.

Comment Letter No. 225

Mia Hagerty
miahagerty@gmail.com

Comment No. 225-1

My name is Mia Hagerty and I am a resident of the Fairfax community. I am concerned about TVC 2050.

Response to Comment No. 225-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 225-2

A “Regional Center” designation is inappropriate and I would like for you to take more time to review the Draft EIR so our community can understand this massive project.

Response to Comment No. 225-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Response to Comment No. 32-3 regarding the noticing of the Project in compliance with CEQA. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day period for most EIRs. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 225-3

I am concerned that our voice is not being heard, [sic]

Response to Comment No. 225-3

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing, the Draft EIR public comment period, and public hearings.

Comment Letter No. 226

Jenny Haghtton
355 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 226-1

As a concerned member of the community, I am completely confused about the proposed TVC 2050. I'm specifically concerned how traffic issues will be resolved along with the current parking problem we already have.

Response to Comment No. 226-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 226-2 through 226-4.

Comment No. 226-2

Being a 1 million+ square foot entertainment studio, what are we supposed to expect in terms of outdoor events and events in general? Are we going to be bombarded with loud noises and constant filming outdoors? Where are the 8,000 employees expected to park? How are they expected to fit into the already congested streets of LA? None of these concerns are even being slightly addressed in the EIR.

Is it true that most of the parking located on Grove Drive? There is no way this many cars can use Grove Drive. Please show an alternative with parking distributed around the property. Why is there a large parking structure being placed on Grove Drive? This is a small street, and it is right across from Pan Pacific Park where small children play. Is no one concerned about the potential health risks at play here from the diesel exhaust that will be emitted? The air quality analysis and other analysis should include this issue.

Where are the hundreds or thousands of audience participants supposed to park? Was this issue even included in the vehicle miles travelled analysis? Has the city considered that these people will most likely be traveling from all over the region? Has the city considered that these people could even be traveling from all over the world for these events? What is the average distance that people travel to visit this area?

Response to Comment No. 226-2

Section IV.I, Noise, of the Draft EIR includes a thorough analysis of Project operations, including outdoor activities. Refer to pages IV.I-43 through IV.I-48 of the Draft EIR. As discussed therein, impacts would be less than significant.

With respect to parking, pursuant to SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, off-site parking is not needed to meet the Project's peak parking demands, and the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The topical response also includes a detailed shared parking analysis that includes the parking demand associated with audience sound stages and Project Site visitors; refer also to Response to Comment No. 106-2, which discusses the weekday peak parking demand by population.

The Project is treated as an employment center in the VMT analysis because the vast majority of the trips to/from the Project Site are generated by Project employees. A small percentage of the total daily trips are generated by audience visitors. Therefore, the appropriate metric to evaluate VMT for the Project is work VMT per employee, which is the metric used in the Draft EIR.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, for information regarding audience visitors and trips.

Regarding the location of parking, it is incorrect that most of the parking is located on The Grove Drive. As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, regarding access and use of The Grove Drive. The parking structure in the southeastern portion of the Project Site was designed as an above grade parking structure because it is located immediately adjacent to the above grade structure for The Grove shopping center and away from the residential neighborhoods to the north and west of the Project Site. The Draft EIR analyzed the noise and air quality impacts from this parking structure on the adjacent Pan Pacific Park in Sections IV.I, Noise, and IV.A, Air Quality, respectively, and the analyses found no significant impacts on the park.

The health risk impacts, including impacts related to Project-related emissions of diesel particulate matter, are analyzed in Section IV.A, Air Quality, of the Draft EIR and in the quantitative HRA, included as Appendix FEIR-10 of this Final EIR. As shown therein,

impacts related to human health risks would be lower than the applicable health risk thresholds at sensitive receptor locations.

Comment No. 226-3

When the additional 8,000 employee spots are occupied, what does this leave for additional visitors? This is no different than Staples, which is an enormous entertainment venue. LA does not have the capacity and is not prepared for the impact that is to come. Is the new development basically going to bring a huge entertainment venue into our Beverly Fairfax neighborhood? If that is what is being planned, then the developer should just be honest about that. Were the analyses done on the basis of it being a huge venue like that?

Response to Comment No. 226-3

Refer to Response to Comment No. 226-2 for a discussion of parking. The Project parking supply will not include 8,000 parking spaces for employees because there will only be 7,832 employees on-site, and not every one of them will drive individual cars to park on-site. The proposed 5,300 parking spaces would be enough to accommodate the employees and visitors to the Project Site, as described in Topical Response No. 13, Parking.

The Project will not include an entertainment venue or multiscreen cinema that would be open to the public and generate outside traffic and parking demands, so any comparison to Staples Center, currently known as Crypto.Com Arena, is inappropriate. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 226-4

There is absolutely not enough information being distributed to the public and as a result we are left fearing for the worst in terms of disturbance in our neighborhoods and even more congestion than we can bear. The EIR has given us no word on how this will be dealt with or how this is going to affect us.

Response to Comment No. 226-4

The Draft EIR was completed in accordance with the requirements of CEQA, and Section IV, Environmental Impact Analysis, of the Draft EIR contains a comprehensive

analysis of the Project's environmental impacts during both construction and operation. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and fulfilled CEQA's informational purpose.

Regarding congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment Letter No. 227

Ray Hahn
329 S. Mansfield Ave.
Los Angeles, CA 90036-3058

Comment No. 227-1

As a community member, I feel completely in the dark about the Television City project.

Response to Comment No. 227-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 227-2 through 227-5.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 227-2

LA is undoubtably already extremely congested. Most of us sit in traffic every day that takes as many as 20 minutes just to travel one mile.

Response to Comment No. 227-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 227-3

Available parking in relation to the population is extremely disproportionate. I understand that this project is projected to bring 8,000+ new jobs. That is 8,000+ more people than the neighborhood can bear. In terms of housing and parking, I do not understand how this is reasonable.

The draft EIR proposes that there will be 5,300 staff parking spaces. The number does not make sense given the estimated number of 8K + new employees and expected visitors and attendees to events. Please explain. The projections of how many of those employees

and visitors will take public transit is completely unrealistic. Where did the assumptions being made come from? Where will all the employees park?

The project proposes 14 stages many of which will be audience stages. An entertainment studio of this scale is likely to bring thousands of people from all over. Where are these people supposed to park? How will this work? Where will the overflow park? Will we be notified of what times will audience members will come to the site? What happens when they park in the community?

Response to Comment No. 227-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the hour-by-hour parking demand for the entire Project Site includes employees, visitors, and audience members.

The Project's Transportation Improvement Program, summarized in Topical Response No. 15, Transportation Improvement Program, includes an NTMP that will allow the neighbors to work with the Applicant and the City to identify measures and strategies to deter Project parking in the neighborhoods. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for a description of the NTMP.

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 regarding the effectiveness of TDM programs.

Refer to Topical Response No. 10, Trip Generation, regarding audience and visitor trips.

Comment No. 227-4

There will be a major noise concern in our neighborhoods. Please provide an analysis of these impacts.

Response to Comment No. 227-4

Noise and vibration during both construction and operation are fully analyzed in Section IV.I, Noise, of the Draft EIR.

Comment No. 227-5

From a risk standpoint, how is this safe at all? This point of congestion would make it nearly impossible for emergency responders to be able to make it anywhere in the city in a timely manner. What is the plan for this? What are the risks from a security standpoint for the community? Speeding in the community could raise a big problem for our children. I also understand the project is taking away certain crosswalks, sidewalks and bike lanes. How is the community supposed to maneuver around the city if this is true? And what police coverage will be provide for our communities if hundreds or thousands of people parking in our community.

Response to Comment No. 227-5

Refer to Topical Response No. 12, Safety and Congestion, for information regarding emergency response times. As described therein, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

The Project is not taking away any crosswalks, sidewalks, or bike lanes. To the contrary, the Project includes improvements to pedestrian infrastructure in the vicinity of the Project Site. Refer to Response to Comment 9-29 for a summary of the proposed improvements.

Refer to Topical Response No. 12, Safety and Congestion, regarding pedestrian and vehicular safety.

Refer to Response to Comment No. 227-3 above for a discussion of parking. The onsite parking supply is adequate to meet demand and parking in adjacent neighborhoods is not anticipated.

Comment No. 227-6

Please provide the public with a detailed analysis of these issues. The analysis needs to be circulated and reviewed so that we can voice our concerns.

Response to Comment No. 227-6

This comment concludes the comment letter. Specific issues raised by the commenter are addressed in Response to Comment Nos. 227-2 through 227-5. As demonstrated therein, the Draft EIR has been completed in accordance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 228

Daryl Hairson
6000 Comey Ave.
Los Angeles, CA 90034-2204

Comment No. 228-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 228-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 229

William Hallmark
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 229-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 229-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 230

Elsa Halpern
1320 N. Poinsettia Pl., Apt. 1
Los Angeles, CA 90046-4328

Comment No. 230-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 230-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 231

Alexa Hand
560 N. Flores St.
West Hollywood, CA 90048-6004

Comment No. 231-1

I am a long-time resident of the Beverly Fairfax community. I am writing to you today in response to the Draft Environmental Impact Report. After reading through it, I am left with many questions and even more concerns.

Response to Comment No. 231-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 231-2 through 231-4.

Comment No. 231-2

As someone who commutes to and from work by car, I am primarily concerned with the impact the Television City project would have on traffic in my neighborhood. Have you analyzed the impacts to those of us who drive in and out of the neighborhood for work, not just those you expect to drive here for work at the new site?

The plan drawings show several semi-trucks onsite. These trucks will consistently have to make left turns into oncoming traffic. Have studies been conducted to analyze how much extra traffic this would create? If so, can that please be outlined to me in a response to my letter? How will some of those trucks access the site, from other points as well? Furthermore, the plan fails to specify how many trucks would be on-site and when. Can you please specify? There's a big difference in the amount of traffic created by 50, 100, 200, and so on trucks.

Response to Comment No. 231-2

First, as discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, impact thresholds relative to changes in driver delay are no longer applicable to identify transportation-related impacts under CEQA. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to

Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

The level of truck trips is also included in the Transportation Assessment both during construction and during typical operations upon completion of the Project. Refer to Topical Response No. 10, Trip Generation, for a discussion of truck activity during Project operations and Topical Response No. 14, Construction Vehicle Impacts, for a discussion of trucks during construction. Access to the Project Site along the arterial streets serving the Project Site, turns into and out of the Project Site, queuing at the Project driveways, and truck movements within the Project Site have all been studied and the driveways designed accordingly. Refer also to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-E.4-15 and 83-1.

During the construction phase of the Project, the busiest time for truck activity would be the excavation of the underground parking structures and the foundation work for the underground parking and the buildings. This excavation and foundation activity is anticipated to last approximately 8.5 months and would generate a maximum of approximately 300 haul trucks per day and approximately 20 delivery trucks per day. Unless extended hours of operation were approved by the Bureau of Engineering District Engineer, the movement of these trucks would occur between 9 A.M. and 3:30 P.M. Refer to Topical Response No. 14, Construction Vehicle Impacts.

During the operation of the fully built out Project, the net increase in trips to/from the Project Site would be approximately 787 trips in the morning peak hour and approximately 855 trips in the afternoon peak hour as described in Table 6 of the Transportation Assessment. Less than approximately 2 percent of the Project's total daily trips would be truck trips. Refer also to Section E, Truck Trips, of Topical Response No. 10, Trip Generation.

Comment No. 231-3

Additionally, I am extremely concerned about the negative health impacts this project could have. Since you are putting a truck road and studio building next to apartments, negative health impacts will undoubtedly occur. What kind of health studies have been conducted to evaluate the impact of noise and fumes on the residents? Did your health analysis, if one was conducted, include the impacts of students at the nearby schools? Which schools were shown to be most affected? What kind of health effects should I be worried about as a resident of Beverly Fairfax?

I understand that there will also be a large parking structure located on Grove Drive. The concerns I have above apply to this parking structure as well. Can you please draft an alternative in which parking is put somewhere else besides Grove Drive? And can you

please avoid residential areas for such parking structures? Additionally, I am concerned about the children and seniors that use Grove Drive. Has a health impact analysis been conducted for these two groups as well? How will the exhaust emitted from the vehicles using the parking structure impact these groups?

Response to Comment No. 231-3

The first portion of this comment is similar to Comment Nos. 141-2, 160-1, and 172-4. Refer to Response to Comment Nos. 141-2, 160-1, and 172-4.

As discussed in Topical Response No. 13, Parking, and Response to Comment No. 226-2, parking will be spread out across the entire Project Site, and all parking areas will be accessible from any of the three signalized entrances to the Project Site. In addition, the Project does not propose off-site parking. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access and use of The Grove Drive.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project. A comprehensive description of sources and assumptions included in the HRA is included Appendix FEIR-10 of this Final EIR. The HRA was conducted following conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased vehicle and truck trips and parking associated with future operations, would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Comment No. 231-4

Furthermore, this project proposes to stage thousands of trucks next to a hospital. What measures has the city taken to inform nearby residents and hospital employees that 60,000 trucks will be creating traffic nearby? What happens when the trucks are creating traffic and an ambulance needs to get to the emergency room? Can the public please see your plans for this?

Response to Comment No. 231-4

The Project has been modified to eliminate the off-site staging of haul trucks along streets serving the Project Site. All haul truck staging would be accommodated within the Project Site itself. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 231-5

Until we receive real information about the extra traffic created by this project and the real impacts expected, I cannot support this. Please respond to my letter with thorough responses to each of my questions. With more information, I can better form my opinion.

Response to Comment No. 231-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 231-2 through 231-4.

Comment Letter No. 232

Rita and Michael Hand
362 N. Flores St.
Los Angeles, CA 90048-2610

Comment No. 232-1

As a resident who lives near the proposed Television City project I need to share a few of my concerns and ask some questions about the project.

Response to Comment No. 232-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 232-2 through 232-9.

Comment No. 232-2

There are many ways this new construction could negatively impact the community here from standpoints of environment, safety, and traffic.

Response to Comment No. 232-2

This comment is similar to Comment No. 118-2. Refer to Response to Comment No. 118-2. Please refer to the respective analyses in Section IV of the Draft EIR for the CEQA-required analysis of Project-related impacts to environmental topics. Refer to Sections IV.J.1 and IV.J.2, Public Services, and IV.K, Transportation, of the Draft EIR for the Project's analysis of fire protection, police protection, and transportation.

Comment No. 232-3

However, it also is going to negatively impact the character of the community. So much Los Angeles history exists in this community and this project fails most of it.

Response to Comment No. 232-3

This comment expresses the opinion of the commenter and does not relate to the Draft EIR's analysis of the Project's environmental impacts, and no further response is required. As discussed in detail in Section IV.B, Cultural Resources, of the Draft EIR, the Project would not result in any significant impacts associated with historical resources. This comment is noted for the administrative record and has been incorporated into this

Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 232-4

- A development that includes 20 story tall office buildings and a massive modern expansion will change the character of this neighborhood forever, and not in a good way. Where is any analysis that was conducted that found that what is being proposed would actually fit in the neighborhood? Fit into the community with its surrounding neighborhoods? The neighborhood has nothing like this huge and tall complex. How can the city consider a project that would so change our neighborhood?

Response to Comment No. 232-4

The comments regarding whether the Project is a good fit for the neighborhood do not raise environmental issues specific to CEQA or the Draft EIR and the environmental impacts addressed therein.

Refer to Response to Comment Nos. 11-3 and 26-7 regarding the size and height of the Project, including as it relates to surrounding uses.

In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, as well as the compatibility of the proposed uses with surrounding land uses, and concluded that impacts would be less than significant.

The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 232-5

- The Adobe is 170 years old and should be protected as the important historic property it is. Where is an analysis of how this construction will impact the Adobe? More importantly has anybody thought of how this construction will destroy the historic context of the Adobe? What about an analysis of the cultural impact of losing this important piece of history?

Response to Comment No. 232-5

The assertion that the Gilmore Adobe will be "lost" is the opinion of the commenter and not supported by substantial evidence. Refer to Section E, Impacts to Historical

Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13, 28-29, and 363-1 regarding the Draft EIR's analysis of impacts to the Gilmore Adobe and its integrity of *setting*. As discussed on page IV.B-55 in Section IV.B, Cultural Resources, of the Draft EIR, the Project does not include the demolition, relocation, rehabilitation, alteration or conversion of the Gilmore Adobe. All of the aspects of integrity for the Gilmore Adobe would be unaffected by the Project, and the historic integrity of this historical resource would be retained (with the exception of *setting*, which is no longer intact since construction of The Grove). After construction of the Project, the Gilmore Adobe would remain intact and continue to convey its historic significance. For these reasons, the historic significance and integrity of the Gilmore Adobe would not be impaired by the Project. After construction of the Project, the Gilmore Adobe would retain its eligibility for listing as an HCM, and the Project would not result in an adverse impact to this historical resource. Thus, impacts would be less than significant.

Also refer to Response to Comment Nos. 26-139 and 363-2 regarding how construction of the Project would not result in significant vibration impacts to the Gilmore Adobe.

Comment No. 232-6

- There will be significant and frequent vibrations and earth movement during the construction process. Were the impacts of the expected earth vibration and movement on nearby homes and apartments analyzed? Over what period of time should residents expect that ground shaking to take place and what times of the day? Are there thresholds for how powerful explosive and movement activity can be?

Response to Comment No. 232-6

Section IV.I, Noise, of the Draft EIR analyzed how construction activities could generate groundborne vibration resulting in impacts related to building damage and human annoyance. Refer to pages IV.I-59 through IV.I-67 of the Draft EIR.

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

Refer to Response to Comment No. 161-2 for a discussion of construction hours.

The thresholds of significance used in the vibration analysis are provided on page IV.I-31 of Section IV.I, Noise, of the Draft EIR. Note that no explosive activities would occur during construction.

Comment No. 232-7

What steps will be taken to make sure that the Adobe, the nearby shopping center, local homes and apartments, and local businesses are kept safe and functional during and after the construction process?

Response to Comment No. 232-7

This comment does not relate to the Draft EIR's analysis of the Project's potential environmental impacts. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding Project construction and the proposed CTMP that will include measures to ensure adequate vehicular and pedestrian access, and pedestrian safety during construction. Refer to Response to Comment No. 16-5 and Section IV.J.2, Public Services—Police Protection, of the Draft EIR regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 232-8

- My other concern from a historic perspective is the Farmer's Market. The Farmer's Market is a Los Angeles institution that ought to be protected and considered before any major construction is done in the surrounding area. What does expert analysis show on the impact this project could have to the customer base of the Farmer's Market? Was a poll done to see if people who currently go there would still do so if construction, increased traffic in the area and parking became issues that could drive customers away? What does the analysis show of how non-customer use of Farmer's Market parking will impact visitor numbers to the farmer's market? How will the city make sure that the Farmer's Market parking lot does not become overflow parking for Television City?

Response to Comment No. 232-8

Construction of the Project would not affect physical access to The Original Farmers Market. Furthermore, as discussed in Topical Response No. 13, Parking, the Project would not result in spillover parking and as such would not affect parking at The Original

Farmers Market. Nonetheless, it should be noted that under CEQA, displacement of customers is not an environmental topic that needs to be addressed.

Comment No. 232-9

As I said at the outset a lot can go wrong for our community with this project and I am sure other people have brought up many of the ways that can happen. I wanted to look at the historic impact because that is too often forgotten in the name of progress here in Los Angeles. I hope you will take time to consider these concerns before you approve this project. The things we could lose cannot be gotten back if this not done right!

Response to Comment No. 232-9

Potential impacts to historical resources are fully analyzed in Section IV.B, Cultural Resources, of the Draft EIR. As discussed therein, impacts would be less than significant. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 233

Greg Hansen
439 1/2 N. Gardner St.
Los Angeles, CA 90036-5753

Comment No. 233-1

I am wondering if the Draft EIR actually took into account those of us who live adjacent to the proposed project who have been working from home since the start of the pandemic. Many of us will continue to work from home as the new normal.

According to the Draft EIR, there will be significant impacts from noise. Based on Appendix M of the Draft EIR, the hauling of material is estimated at 772,000 cubic yards. However, Footnote 11 indicates that this number is just an estimate and that the amount is actually 822,000 cubic yards of material. Why the difference? Further, the hauling of this material is anticipated to take 9 months. Does that mean residents who live adjacent to Beverly Boulevard (the anticipated route) will have to endure the noise of haul trucks for 9 months? The Draft EIR is identifying 640 daily truck trips during that time period. What is the applicant doing to mitigate this impact on residents?

Response to Comment No. 233-1

Refer to pages IV.I-18 to IV.I-19 and Figure IV.I-3 on page IV.I-20 in Section IV.I, Noise, of the Draft EIR regarding the sensitive receptors that were analyzed.

The second paragraph of this comment is identical to the first paragraph of Comment No. 177-2. Refer to Response to Comment No. 177-2, above.

Comment No. 233-2

If the project's proposed development agreement is approved by the decision-makers, does that mean that residents will have to endure a relentless bombardment of noise during the construction of a 20-year period? If this is the case, will the construction have any interim periods of "no-build" so the community can have some relief from the construction noise?

Response to Comment No. 233-2

This comment is identical to the second paragraph of Comment No. 177-2. Refer to Response to Comment No. 177-2, above.

Comment No. 233-3

Please explain how your methodology took into consideration the project's noise impacts on those of us working from home in the adjacent residential properties.

Response to Comment No. 233-3

This comment is identical to the third paragraph of Comment No. 177-2. Refer to Response to Comment No. 177-2, above.

Comment Letter No. 234

Greg Hansen
439 1/2 N. Gardner St.
Los Angeles, CA 90036-5753

Comment No. 234-1

I have significant concerns with the TVC 2050 project and how it will impact access to public transit and non-vehicle access in the Beverly-Fairfax area.

Los Angeles is a car-intensive community and walking or biking in our city can be perilous at times. I'm concerned that the intensity of the construction work for TVC 2050 and the length of time construction will be ongoing will make my neighborhood practically unlivable.

Response to Comment No. 234-1

The Project would improve access to public transit, pedestrian safety, and multi-modal access around the Project Site. Refer to Topical Response No. 7, Mobility Hub, and Topical Response No. 15, Transportation Improvement Program. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 16-72 and 26-E.4-3 regarding pedestrian safety and the Project's pedestrian-oriented design.

Comment No. 234-2

The draft EIR for this project calls for the excavation of 700,000 cubic yards of dirt. That means a tremendous number of trucks entering and leaving the site to remove not just soil but demolition debris as well. How is this going to impact the air quality of the neighborhood? What are the plans for making sure all the dust from this project doesn't find its way into our lungs?

Response to Comment No. 234-2

As shown in Tables IV.A-10 and IV.A-11 of the Draft EIR, after the application of mitigation, localized air quality impacts, including particulate (i.e., dust) impacts, would not exceed SCAQMD LST thresholds, and impacts would be less than significant. Refer to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust.

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, which

includes mandatory control actions and dust control contingency measures to control fugitive dust.

Comment No. 234-3

Will blasting be required during any of the phases of construction? When during construction and how much blasting? What days and times? How will neighborhood residents be notified?

Response to Comment No. 234-3

Project construction does not require blasting.

Comment No. 234-4

The draft EIR also seems to suggest a significant portion of the visitors to TVC 2050 once production starts will take mass transit to get there. How do they arrive at their projections? Will this increase in the number of mass transit users crowd out neighborhood residents who use mass transit for commuting and errands? If visitors to TVC park on residential streets or at the Farmer's Market, will neighborhood residents be inconvenienced?

Response to Comment No. 234-4

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 regarding the effectiveness of TDM programs. As described in Topical Response No. 11, the Draft EIR only assumed a combined transit, bicycle, and pedestrian reduction of 15 percent in the trip generation estimates used in the Draft EIR transportation analysis. This level of auto reduction is based on LADOT analyses of projects located in similar urbanized areas of the City of Los Angeles with comparable transit service. The examples shown in Topical Response No. 11 show that the Project should have no trouble meeting the 15 percent trip reduction levels shown in the Draft EIR. In addition, the Topical Response explains a more extensive TDM Program proposed by the Project which would exceed the trip reduction levels tested in the Draft EIR.

In reference to the question of transit capacity availability to serve the Project transit trips, Tables 4A and 4B on pages 58 and 59 of the Transportation Assessment (Appendix M.1 of the Draft EIR) show that the current transit system has approximately 2,000 empty seats on the bus lines serving the Project Site in both the morning and afternoon peak hours, which is well more than the anticipated Project transit trips to be added to the system. These transit capacity totals do not include the additional transit seats that will be made available to the area when the Metro D (Purple) Line Wilshire/Fairfax Station opens. The opening of the Metro D (Purple) Line Wilshire/Fairfax Station is scheduled to occur before the buildout of the Project.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking.

Comment No. 234-5

Please provide more detailed answers and information.

Response to Comment No. 234-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 234-1 through 234-4.

Comment Letter No. 235

Robert Hansen
263 Norumbega Dr.
Monrovia, CA 91016-2415

Comment No. 235-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 235-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 236

Sam Hansen
402 N. Vista St.
Los Angeles, CA 90036-5741

Comment No. 236-1

Even with being thousands of pages long, the EIR you came out with for the Television City plan raises more questions and concerns than it answers.

Response to Comment No. 236-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 236-2 through 236-7.

Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

Comment No. 236-2

The EIR says the average employee will commute 6.7 miles per day. What is considered an average employee? Where does that commuter mileage come from? Everyone knows very few people have a commute in Los Angeles of only 6.7 miles. Does that even make sense to the planning department? In the already terrible traffic in the Beverly Fairfax area, even 6.7 miles can take more than 45 minutes depending upon the time of day. Has the city recently timed the trip from the intersection of Beverly Fairfax heading down Fairfax to the 10? Are the people that wrote this from LA?

Response to Comment No. 236-2

A full discussion of the trip length and other assumptions that went into the VMT analysis is found in Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-156. As substantiated therein, the approach to, and assumptions for, using the City's VMT Calculator tool to analyze the Project's VMT impacts were appropriate, as acknowledged by LADOT in its Assessment Letter that is included as Appendix M.2 of the Draft EIR.

Comment No. 236-3

Have you considered taking a poll on where people commute from in this area to see if this is possible or if it's completely unimaginable? The city should know much more about who

the expected commuters are who will be working there, where they are traveling to and from, and not use unrealistic assumptions when calculating impacts of all that traffic. Have you done this?

Response to Comment No. 236-3

Refer to Response to Comment No. 236-2 and Topical Response No. 10, Trip Generation, for a discussion of the validity of the assumptions used to calculate the average employee VMT.

Comment No. 236-4

Additionally, there will be hundreds of additional trucks along Fairfax as a result of the project and yet the EIR has not really analyze [sic] the noise and air quality changes that will result from this traffic. I did not find information about that, where is it? Have they even notified the people along Fairfax who will be impacted?!

Response to Comment No. 236-4

The comment regarding the number of additional trucks along Fairfax is incorrect. Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation.

It is not clear whether the commenter is referring to noise from trucks during construction or operation of the Project. Construction noise associated with truck trips was analyzed in Section IV.I, Noise, of the Draft EIR; refer to pages IV.I-35 to IV.I-43 and Table IV.I-11 therein.

Section IV.I, Noise, of the Draft EIR also analyzed the Project's operational impacts related to off-site vehicle noise on Fairfax Avenue, Beverly Boulevard, 3rd Street, Crescent Heights Boulevard, The Grove Drive, and Gardner Street; refer to pages IV.I-48 to IV.I-54 and Table IV.I-17 therein. As shown in Table IV.I-17, the Project's impact on Fairfax Avenue would be less than significant.

Refer to Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, and Appendix B of the Draft EIR, which analyze the air quality and GHG impacts associated with trucks. Refer also to Response to Comment No. 231-3 for a detailed response regarding potential health risk impacts related to diesel trucks; Response to Comment No. 87-1 regarding pollutant emissions related to production trucks; and Response to Comment No. 26-E.1-16 regarding the number of operational trucks.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing that has occurred as part of the CEQA process for the Project.

Comment No. 236-5

We have not seen a concrete description of what the project actually is. We need to see the specific plan to truly understand its impact. I found the EIR plan [sic] and to be very confusing and contradictory, and that is coming from someone who reads a lot and cares about Los Angeles politics. People who do not have this knowledge will be even more confused than I am!

Response to Comment No. 236-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, all of the physical aspects of the Project that will be implemented by the proposed Specific Plan were fully disclosed and analyzed in the EIR in accordance with CEQA, and although neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 236-6

The EIR says that there will be special events held at the property. This may be a distraction to the neighborhood. Were the impacts from these special events truly analyzed in the EIR? If so, how were the special events included and considered? When will they be held? Mostly at night? If the project knows what special events will be held, why hasn't that information made available to the community in the plan?

Response to Comment No. 236-6

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 66-5 with regard to special events. As discussed therein, the proposed Specific Plan would not regulate special events; rather, special events would continue to be governed by the LAMC, consistent with existing conditions.

Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 236-7

If not included, how does the City know what impacts there may be to our community from the increased people attending these events, including traffic, security, and noise? Will there be lanes blocked off for limos and special bright lights, like at celebrity events? All of that sounds awful for our neighborhood.

Response to Comment No. 236-7

The transportation analysis in the Draft EIR fully accounted for all trips generated by the Project (employees, visitors, audience members, production vehicles, deliveries, etc.). Trip generation and parking demand from special events related to onsite production activities are already included in the trip generation estimates used in the Transportation Assessment (Appendix M.1 of the Draft EIR). Refer to Section C, Special Events, of Topical Response No. 10, Trip Generation, regarding how special events (not related to the studio) would not be regulated by the Project's Specific Plan and would continue to be regulated on a case-by-case basis by City departments consistent with existing conditions.

With respect to security, the Project includes Project Design Feature POL-PDF-2 which requires a 24/7 security plan. This plan would cover special events. Refer to page IV.J.2-12 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR.

There are pick-up/drop off areas planned within the Mobility Hub, and the Project would have numerous entrances linked to potential pick-up/drop off areas within the Project Site. Therefore, the blockage of travel lanes by limos and celebrity vehicles is not anticipated.

The Project's operational noise analysis included in Section IV.I, Noise, of the Draft EIR accounts for production events and outdoor activities. Refer to pages IV.I-43 through IV.I-48 therein.

With respect to the environmental impact of lighting, pursuant to Public Resources Code Section 21099, because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 38–40 of the Initial Study for a discussion of lighting.

Comment Letter No. 237

Gale Harlow
457 1/2 N. Hayworth Ave.
Los Angeles, CA 90048-2703

Comment No. 237-1

I [sic] I am a resident of 22 years.

Response to Comment No. 237-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 237-2

I am concerned about the traffic and lack of public parking. If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with the consequences of the increased pollution, noise and traffic, the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 237-2

With respect to traffic and parking, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). In addition, while parking impacts are also no longer CEQA impacts under SB 743, refer to Topical Response No. 13, Parking, regarding the adequacy of the proposed parking supply to meet the demands of the Project and prevent spillover parking.

The remainder of this comment is identical to Comment No. 114-5. Refer to Response to Comment No. 114-5, above.

Comment Letter No. 238

Kathleen Harper
522 N. Edinburgh Ave.
Los Angeles, CA 90048-2310

Comment No. 238-1

The traffic section very confusing. Why do members of the public need to wade through an 83-pages [sic] just to see that we can expect gridlock and congestion? There is no way that thousands of trucks and thousands of cars will orderly come in and out of our community and have no profound impact.

Response to Comment No. 238-1

The analysis included in Section IV.K, Transportation, and Appendix M.1, Transportation Assessment, of the Draft EIR meets the requirements of CEQA. The Draft EIR and the Transportation Assessment analyzed the potential transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would have less-than-significant transportation impacts. Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Topical Response No. 10, Trip Generation, regarding the truck and automobile trip generation estimates during Project operation.

Comment No. 238-2

This project falls very short in providing enough parking for the thousands of cars that will be pouring in every day and it's obvious that a lot of people won't bother to park in the garage, but instead park in the nearby streets, which will affect our neighborhood's walkability and safety.

Response to Comment No. 238-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the onsite parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment Letter No. 239

Susan Harrington
6351 Drexel Ave.
Los Angeles, CA 90048-4703

Comment No. 239-1

As a nearby resident, I am concerned about this proposed Television City studio development. Unfettered growth in the area is only causing more pollution from increased vehicle traffic.

Response to Comment No. 239-1

Refer to Sections IV.A, Air Quality; IV.E, Greenhouse Gas Emissions; and IV.K, Transportation, of the Draft EIR for the analyses of the air quality, GHG and transportation impacts of the Project.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 239-2

Inevitably we will witness an increase in pedestrian injury and death caused by the influx of new vehicles on the road, and the confusion that a huge construction project like this will create in the area for walkers and cyclists.

Response to Comment No. 239-2

This comment is identical to a portion of Comment No. 175-1. Refer to Response to Comment No. 175-1, above.

Comment No. 239-3

I can hardly park my car now. What will it be like for years of construction to come? The EIR says 3 years of construction, but you can't tell me that a project of this magnitude will be completed in 3 years. To me, we are talking about 10+ years of ridiculous traffic, detours on our already loaded streets, and public safety issues that nobody has even considered. But yes, the almighty dollar reigns again.

Response to Comment No. 239-3

The most intense construction impacts would occur if the Project were constructed in one phase and that single-phase construction plan is anticipated to last approximately 32 months. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

With respect to parking, construction worker parking will also be provided on-site. The Project Site is large enough that construction workers in the early phases of construction can park on the surface parking lots on one portion of the Project Site while the excavation is taking place on the other portions of the Project Site.

Regarding public safety and traffic, refer to Topical Response No. 12, Safety and Congestion.

Comment No. 239-4

I am requesting that the city hold a public hearing regarding TVC 2050 with posted public notices and full presentation given to our community members. There should be an opportunity for all concerned members of the community to ask as many questions as needed and get their questions answered.

Response to Comment No. 239-4

Refer to Response to Comment No. 32-3. As discussed therein, the Applicant has actively engaged with stakeholders and shared information about the Project beginning in 2019, and the Project has complied with and exceeded CEQA's noticing requirements. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day required under CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during public hearings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings.

Comment Letter No. 240

James Harris
jh3312@pacbell.net

Comment No. 240-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 240-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 241

Monique Hart
624 S. Citrus Ave.
Los Angeles, CA 90036-3535

Comment No. 241-1

The EIR for the Television City 2050 project leaves me with many questions about construction of the project and the impacts it will have on the community.

Response to Comment No. 241-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The Draft EIR comprehensively analyzed the Project's potential impacts during both construction and operation; refer to Section IV of the Draft EIR.

Comment No. 241-2

Where are the details about the length of the anticipated construction? Will it last for a couple of years, or 20 years? This is a concern. If it will last three years, this sounds awful, and hard to imagine all the needed excavation and building of 20-story buildings would only take three years. Why does the city believe it could be done in that timeframe? Is the developer actually being realistic and honest about the whole project being done in three years? With a three-year timeline, the traffic, air quality, dewatering, safety, and other impacts will be intense enough. We in the community will all feel those effects.

Response to Comment No. 241-2

The construction schedule is included in Appendix B of the Draft EIR (pdf page 32) and is discussed further in Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

The Draft EIR fully evaluated impacts associated with transportation, air quality, dewatering, safety, and all other impacts that are required to be evaluated under CEQA. Refer to Table I-1 on page I-14 through page I-16 of Section I, Executive Summary, of the Draft EIR for a summary of impact conclusions.

Comment No. 241-3

But If [sic] it will last 20 years (or more), those impacts, [sic] would be how many more times as serious and adverse? Where in the EIR does it explain how these the differences in impacts between the different construction timelines were determined? Why isn't this made more clear to the community? It seems that the city is being pressured by the developer to glaze over this fact.

Response to Comment No. 241-3

Refer to Response to Comment No. 9-24 regarding the Project timeline. As discussed therein, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 32-month buildout and a 20-year buildout is included for each of the environmental topics studied in the Draft EIR.

Project impacts associated with a long-term buildout through 2043 are specifically addressed in the subsections titled "Project Impacts with Long-Term Buildout" within each of the impact analysis sections in Section IV of the Draft EIR. These are located on pages IV.A-74 through IV.A-77 of Section IV.A, Air Quality; page IV.B-59 of Section IV.B, Cultural Resources; pages IV.C-43 and IV.C-44 of Section IV.C, Energy; page IV.D-28 of Section IV.D, Geology and Soils; pages IV.E-85 and IV.E-86 of Section IV.E, Greenhouse Gas Emissions; pages IV.F-58 and IV.F-59 of Section IV.F, Hazards and Hazardous Materials; page IV.G-41 of Section IV.G, Hydrology and Water Quality; page IV.H-57 of Section IV.H, Land Use and Planning; page IV.I-68 of Section IV.I, Noise; page IV.J.1-28 of Section IV.J.1, Public Services—Fire Protection; pages IV.J.2-17 and IV.J.2-18 of Section IV.J.2, Public Services—Police Protection; pages IV.K-80 and IV.K-81 of Section IV.K, Transportation; page IV.L-17 of Section IV.L, Tribal Cultural Resources; pages IV.M.1-41 and IV.M.1-42 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure; page IV.M.2-19 of Section IV.M.2, Utilities and Service Systems—Wastewater; and page IV.M.3-14 of Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure.

Please note that the Draft and Final EIRs were prepared by the Los Angeles Department of City Planning as Lead Agency in accordance with CEQA and City policies.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 241-4

The scariest problem to me as a resident of LA are the safety impacts. What happens to residents when thousands of additional trucks are on the road in a fairly residential area? And what about the impacts to the local businesses? And impacts to their customers?

Response to Comment No. 241-4

The construction trucks that would be used for hauling dirt from the Project Site would be limited to three haul routes between the Project Site and I-10. These routes, described in Topical Response No. 14, Construction Vehicle Impacts, would be enforced by LAPD. No local residential streets would be used for any construction truck movement. Also refer to Topical Response No. 14 regarding the number of trucks during construction.

One of the elements of the CTMP is to schedule the trucks by route and by time of day to minimize the disruption of the Project truck movements on the area roadways, residents, and businesses. Note that potential impacts to customers of businesses are not CEQA impacts.

Comment No. 241-5

The people in this community include many students, visitors to the Holocaust Museum and other museums, family members visiting nursing home residents, visitors to Pan Pacific Park, and Jewish congregants attending events at the synagogue. Are the safety hazards to each of these potentially vulnerable groups included in the EIR? With all the additional traffic, car accidents will surely increase, including accidents involving pedestrians. What do the studies say about the impacts of the project on increased accidents and increased incidences involving cars and pedestrians? The city has a responsibility to seriously consider their safety and protect them as it studies the impacts of proposed projects.

Response to Comment No. 241-5

Refer to Response to Comment No. 41-4 for a discussion of pedestrian safety to the Holocaust Museum and Pan Pacific Park. As discussed therein, the Holocaust Museum drop off takes place on the east side of the roadway in a bus bay offset from the northbound through lanes. The school children are dropped off on a sidewalk adjacent to the Museum and they never have to cross The Grove Drive. For pedestrians approaching the Museum from the west side sidewalk, a protected marked crosswalk would be incorporated into the traffic signal controlling the entrance to the Project.

Regarding the general concern about increased accidents in the area, see Topical Response No. 12, Safety and Congestion. Note that congestion and car accidents are not

CEQA impacts. Refer to Response to Comment Nos. 9-29 and 26-E.4-3 regarding hazards and pedestrian safety.

Comment No. 241-6

And, again, how will the risks differ if the project lasts three or 20 years or somewhere in between? And, once Television City 2050 is up and running, where are those separate and different risks analyzed and included in the EIR? There will be thousands of additional employees and audience members in the community at that point. That means thousands more vehicles on the roads of the community.

Thank you for answering my questions about this proposed project.

Response to Comment No. 241-6

The 32-month construction schedule analyzed throughout the Draft EIR represents a conservative scenario because it includes more overlapping activities. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR. Refer to Response to Comment No. 9-24 regarding the buildout timeline. Operational impacts, including transportation, are evaluated throughout the Draft EIR.

Refer to Topical Response No. 10, Trip Generation, regarding the trips that would be generated by the Project, including employee and audience trips.

This comment refers to generalized “risks” without specifying a concern, and has been noted for the administrative record.

Comment Letter No. 242

Carol Hayes
401 S. Detroit St., Apt. 216
Los Angeles, CA 90036-3693

Comment No. 242-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 242-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 243

Brian Head
439 1/2 N. Stanley Ave.
Los Angeles, CA 90036-2301

Comment No. 243-1

I have many questions regarding the proposed Television City project. What is the distance of the venue to the three nearest airports? What types of public transit will be available along those routes? The entertainment venue as proposed in the EIR seems massive... fourteen stages is too many for this community, along with everything else being proposed for the location.

Response to Comment No. 243-1

Refer to Response to Comment No. 115-1 regarding the distance to airports and public transit.

The Project is not an entertainment venue but, rather, an employment project associated with the entertainment industry.

The comment about the size of the Project provides a general statement on the Project and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 243-2

How will it work having fourteen stages? Can multiple stages be used at the same time? Please provide me with specific information regarding the logistics of this multi-stage concert venue. I am confused on why California needs another concert venue. Between Staples Center, Banc of California Stadium, Oracle Arena, and SAP Center, I am concerned about oversaturating the market. What studies were done that show the need for this capacity?

The draft EIR refers to large projects that could have a negative impact on nearby businesses. What will be those negative impacts? What large projects are being referred to? What have nearby businesses been told about the proposed projects? We cannot leave behind the businesses that are essential and have an important role in the community.

Response to Comment No. 243-2

The first paragraph of this comment is identical to the second paragraph of Comment No. 115-2. Refer to Response to Comment No. 115-2, above. Note that the Project does not include a concert venue.

It is unknown what the first sentence of the second paragraph of this comment is referring to. Further, impact on businesses is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 243-3

The Farmers Market and the Grove are two of Beverly Fairfax's most popular destinations for people in surrounding areas. These parking lots are typically full, and I am concerned about the impact the venue with fourteen stages and all the other operations of the development will have on these locations. How many parking spaces will be reserved at the Farmers Market and the Grove for people attending a concert at the proposed venue? What about for the other events mentioned?

Response to Comment No. 243-3

This comment is identical to the first part of Comment No. 115-4. Refer to Response to Comment No. 115-4, above.

Comment No. 243-4

Both of these locations also have valet parking available from 10AM–10PM. Will valet parking be offered at the concert venue? If not, what specific measures will be taken to ensure that parking for the Farmers Market and the Grove are reserved for Farmers Market and the Grove customers? The Beverly Fairfax Historic District includes several attractions, and it is essential that the voices of these businesses are heard.

Response to Comment No. 243-4

This comment is identical to Comment No. 115-5. Refer to Response to Comment No. 115-5, above.

Comment No. 243-5

Please provide me with all information regarding plans for the concert venue, use of the fourteen stages, and use of the other development features that will bring many people to the site.

Response to Comment No. 243-5

This comment is identical to Comment No. 115-6. Refer to Response to Comment No. 115-6, above.

Comment Letter No. 244

Mendy Hecht
419 N. Poinsettia Pl.
Los Angeles, CA 90036-2504

Comment No. 244-1

I am a long-time resident of Beverly Fairfax.

Response to Comment No. 244-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 244-2

I also care deeply about access to alternative means of transportation. That's why when I learned what could happen to bike lanes and sidewalks as a result of the Television City 2050 project, I knew I had to submit my concerns and ask questions.

Response to Comment No. 244-2

There are no plans to reduce or eliminate any sidewalks or bike lanes as part of the Project. Likewise, the Project would not preclude any of the long-range bike facilities included in the City's plans.

The Project would promote access to alternative means of transportation through its Transportation Improvement Program; refer to Topical Response No. 15, Transportation Improvement Program.

Comment No. 244-3

The TVC 2050 project could take up to 20 years to complete. What will happen to bike lanes and sidewalks that people rely on for transportation during this construction period? What studies have been conducted to evaluate the negative impacts this disruption could have on lower income residents that rely exclusively on bikes and walking to get from point A to point B? What safety analyses have been conducted to show the negative impact sidewalk and bike lane disruption can have on bikers and walkers?

Response to Comment No. 244-3

Refer to Response to Comment No. 244-2. The Project would not implement any improvements that will interfere with the City's long-range bicycle lanes for the area. The pedestrian sidewalks would be maintained around the entire perimeter of the Project Site at all times. If construction requires the temporary closure of a section of public sidewalk, a temporary alternate sidewalk would be provided.

Comment No. 244-4

Additionally, this plan includes bike and pedestrian improvements that may be included but are not finalized. I am concerned that the project's construction will permanently damage the existing network of bike lanes and sidewalks instead of improving them. This would have a significant impact on the residents that rely on this means of transportation. Can you please outline what improvements will be made? Why are they not included in the final plan? When will the public be informed about the improvements and when will they be made? Have any studies been conducted on how much better these improvements will be than their original form? What preservation measures could be used as an alternative? The lack of commitment to finalizing and codifying these improvements concerns me deeply.

Response to Comment No. 244-4

The Project would enhance pedestrian safety within and surrounding the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 16-72 and 26-E.4-3 regarding the Project's pedestrian-oriented design and pedestrian safety. The Project would not implement any improvements that would interfere with the City's long-range bicycle lanes for the area. No sidewalks or bike lanes would be closed or reduced as part of this Project.

Comment No. 244-5

Alternative modes of transportation are extremely important to me and other residents of Beverly Fairfax. It is unacceptable that this project might permanently disrupt the existing network of bike lanes and sidewalks. I hope that the city will take my concerns seriously and answer each of my questions in detail.

Response to Comment No. 244-5

Refer to Response to Comment No. 244-2. No part of the Project would disrupt the existing network of bike lanes and sidewalks.

Comment Letter No. 245

Kelsey Hellenbrand
8217 Blackburn Ave., Apt. 5
Los Angeles CA 90048-4231

Comment No. 245-1

I am writing to oppose the Television City Project in the Beverly/Fairfax neighborhood. I am just really unsure how allowing this development could possibly be considered a good addition to the neighborhood. There are already so many developments in the area and adding a development with this size and number of employees just sounds like a terrible idea.

Response to Comment No. 245-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 245-2 and 245-3.

Comment No. 245-2

What are the combined effects of this project and other developments in the works? Where is the information that makes clear what additional impacts will result from yet another traffic-generating project being added to the mix of planned projects?

Besides the amount of traffic this project will bring, what about the construction? Added construction vehicles and road/lane closures around the site would make the everyday commute a nightmare for those who live in the area.

Response to Comment No. 245-2

Cumulative impacts are analyzed in each section of the Draft EIR, including the transportation analysis. Refer to Section III, Environmental Setting, of the Draft EIR, which describes in detail the cumulative study area. A total of 68 related development projects were included in the analysis.

Refer to Response to Comment No. 162-2 regarding the construction assessment included in Appendix M.1, Transportation Assessment, of the Draft EIR. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Regarding lane and sidewalk closures, while temporary closures may be necessary during construction, there would not be any long-term travel lane or sidewalk closures.

Comment No. 245-3

I heard that the developer is wanting to have some flexibility to build over a 20-year time frame. I am sorry... 20 YEARS? That is just unacceptable and would be a failure from the city to allow something so egregious. Clearly there isn't a need for this development if it is going to take 20 years to build. Do what is right and deny this project.

Response to Comment No. 245-3

The Project does not propose continuous construction for 20 years. Refer to Response to Comment No. 9-24 regarding the Project timeline.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 245-4

I just ask that you consider the people who live here and not the developer who does not. This is an unfriendly addition to the neighborhood, and WE DO NOT WANT IT.

Response to Comment No. 245-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 245-2 and 245-3.

Comment Letter No. 246

James Henly
804 S. Sherbourne Dr.
Los Angeles CA 90035

Comment No. 246-1

The ambiguity of the DEIR for the Television City project concerns me greatly.

Response to Comment No. 246-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 246-2 and 246-6.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 246-2

The Beverly Fairfax Historic District and the neighborhood have existed just fine for a long time without an addition of a “mobility hub” and now is not the time to change that. Where is any analysis that supports the area needing a mobility hub? Where is the request from the community that we want this?

Response to Comment No. 246-2

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project would not impact the Beverly Fairfax Historic District. Refer to Topical Response No. 7, Mobility Hub, regarding the proposed Mobility Hub. The EIR analyzed all potential environmental impacts associated with the proposed Mobility Hub. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 246-3

What are the specific plans and details for the mobility hub? Will the mobility hub provide revenue to the city and how much? How many people will the mobility hub employ? Will these part of the employee numbers indicted in the DEIR?

Response to Comment No. 246-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Conceptual Site Plan, including the Mobility Hub. The Transportation Assessment (Appendix M.1 of the Draft EIR) includes the Mobility Hub plan in Figure 4 (page 15). The Mobility Hub would be located on-site near the proposed signalized intersection of Fairfax Avenue and 1st Street to provide a connection between the Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site. Refer to Topical Response No. 7, Mobility Hub.

No revenue would be generated by the Mobility Hub for either the Project or the City. Rather, the Mobility Hub would be an amenity provided by the Project to encourage and support non-auto travel to/from the Project Site.

The Mobility Hub would be supported by Project security staff, which is accounted for in the overall Project employee estimates.

Comment No. 246-4

I did not see an analysis of any sort over the traffic pollution that the mobility hub will cause and the impacts of those additional air quality issues. Where are the EIR findings about the impacts the inevitable influx of buses, trains, and cars will have in this area? What is planned to deal with all those impacts?

Response to Comment No. 246-4

Please see Response to Comment No. 16-80 for a discussion of the vehicle trip effects of the Mobility Hub, which would be expected to reduce vehicle trips associated with Project operations. As described on page IV.K-74 of Section IV.K, Transportation, of the Draft EIR, the Project's VMT analysis (and the operational transportation analysis) excludes (i.e., does not take credit for) most of the elements of the TDM Program and, therefore, represents a conservative (i.e., high) estimate of total Project trips. The Draft EIR's air quality analysis used the same conservative estimate of total Project trips. As shown in Table IV.A-7 (Estimated Maximum Regional Daily Operational Emissions at Project Buildout (2026)) in Section IV.A, Air Quality, of the Draft EIR, regional emissions resulting from operation of the Project would not exceed SCAQMD's daily regional operational thresholds.

As discussed in Topical Response No. 7, Mobility Hub, the Mobility Hub would reduce the number of Project trips and VMT below what was analyzed in the Draft EIR. Additional detail for informational purposes is provided in the Confirmatory Air Quality,

GHG, and Energy Analysis in Response to Public Comments (see Appendix FEIR-9 of this Final EIR) showing that the Mobility Hub would serve to reduce both vehicle trips and VMT.

Comment No. 246-5

In addition, I have seen an increase of scooters and bikes in the Los Angeles area. While these are energy efficient means of transportation, many residents and I agree that we do not want the sidewalks littered with scooters and bikes. Will the developers be adding bike or scooter lanes to any of these streets? What about disabled residents of Beverly Fairfax that use their wheelchair on the sidewalk? I do not see how this could be safe. What initiatives will the developers take to ensure that our sidewalks are not full of scooter and bike traffic and remain safe for pedestrians?

Response to Comment No. 246-5

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety. The Project is not proposing to add bike or scooter lanes. Scooter usage and scooter parking is managed by LADOT and their contractors on a citywide basis. This comment discusses issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 246-6

How close will the mobility hub be to each of the schools within the Beverly Fairfax Historic District? Are the developers even considering the increase of traffic in the area with an already high level of traffic during drop off and pick up of school children? It is essential that residents know what kind of disruption to their daily life there will be.

Response to Comment No. 246-6

The Mobility Hub would be located off-street completely within the Project Site near the corner of Fairfax Avenue and 1st Street. The purpose of the Mobility Hub is to support non-auto travel to/from the Project Site, thereby reducing auto travel levels on the streets within the Study Area. The residents and schools of the area would not experience any additional disruption because of the Mobility Hub.

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Project's Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 246-7

Please reach out to me with any questions about my concerns as well as update me on any additions or changes to the DEIR.

Response to Comment No. 246-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 246-2 and 246-6.

Comment Letter No. 247

Matt Hensley
matthensley@msn.com

Comment No. 247-1

I am upset and have questions about several things presented in the EIR for the Television City Project.

Response to Comment No. 247-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 247-2 through 247-6.

Comment No. 247-2

1. Will the project pump groundwater? How much groundwater? When during the project timeline will groundwater pumping occur and for how long? Won't that potentially cause contamination of the groundwater that we use? How will this groundwater be disposed of? How this crucial part of the project is going to be done needs to be made more clear.

Response to Comment No. 247-2

Construction dewatering is anticipated as part of the Project but such dewatering is not anticipated to result in significant impacts to groundwater. Refer to Response to Comment No. 11-25 regarding the quantity of groundwater to be extracted and the duration of dewatering. Refer to Response to Comment No. 16-64 for a summary of how the extracted groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal method. Refer to Response to Comment No. 3-7 regarding potential impacts to groundwater quality and how groundwater would be discharged. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Draft EIR's analysis of groundwater quality. Refer to Response to Comment No. 26-E.3-10 regarding groundwater contamination.

Comment No. 247-3

2. This project is right nearby the La Brea Tar Pits. Any amateur paleontologist would tell you there could be a variety of fossils in the area. What will be the impact of project activities on resources in the ground such as fossils? Where is

the analysis to identify those potential resources, and what does were the findings? If fossils do end up being unearthed, what steps will be taken to handle those artifacts? Will construction be shut down so that a full and proper examination of the area be done?

Response to Comment No. 247-3

Refer to Response to Comment Nos. 35-90 and 35-91 regarding the Draft EIR's analysis of the Project's potential to impact paleontological resources and revisions to Mitigation Measure GEO-MM-1, which requires that a paleontologist be retained to prepare a Paleontological Resource Mitigation and Treatment Plan for the Project. The Paleontological Resource Mitigation and Treatment Plan shall include communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens. Further, Mitigation Measure GEO-MM-1 has been revised to clarify that the paleontological monitor will have the authority to stop construction in an area where a significant paleontological resource is discovered. In addition, a worker environmental awareness program will be conducted at the preconstruction meeting for the Project in accordance with Mitigation Measure GEO-MM-1.

Comment No. 247-4

3. The EIR says that events and filming could be held outdoors. What kinds of events would be held? Do the different kinds of events require different permits or fall under different regulations? Different kinds of outdoor activities obviously can cause serious noise in the area, as well impact the community. How is outdoor activity handled differently from a safety and noise perspective? Will scenes with guns be filmed?

Will there be large audiences or casts if filming? Or large crowds attending if [sic] an event? What hours will events be allowed? What hours would filming be allowed to be done? It looks like the studio is going to be surrounded by houses, which seems dangerous at best, and definitely residents who will be affected. More analysis is needed; where is the detailed information about all these outdoor activities and the specifics about the impacts associated with the different kinds of outdoor events and outdoor filming?

Response to Comment No. 247-4

Television City has been an operating studio within the Project Site since 1952 and will continue to operate as a studio upon completion of the Project. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 66-5

with regard to special events. Topical Response No. 3 also provides a discussion of how special events would continue to be governed by the LAMC, consistent with existing conditions. Refer to Section B, Visitor Trips and Section C, Special Events of Topical Response No. 10, Trip Generation, for additional information regarding audience and special event visitors. Refer to pages IV.I-43 through IV.I-48 of Section IV.I, Noise, of the Draft EIR for an analysis of noise associated with operation of the Project, including noise from outdoor production activities and potential impacts to nearby sensitive receptors. As demonstrated therein, noise impacts associated with operation of the Project would be less than significant. With regard to safety, outdoor production activities would continue to occur in accordance with regulatory requirements, including those set forth by OSHA.

Contrary to this comment, the Project Site is not surrounded by houses; refer to pages III-3 to III-4 in Section III, Environmental Setting, of the Draft EIR. Potential impacts on nearby residential uses and other sensitive receptors were fully analyzed in the Draft EIR.

Refer to pages IV.I-43 through IV.I-48 of Section IV.I, Noise, of the Draft EIR for an analysis of noise associated with operation of the Project including noise from outdoor production activities and potential impacts to nearby sensitive receptors. As demonstrated therein, noise impacts associated with operation of the Project would be less than significant. In particular, as discussed in Response to Comment No. 26-140, outdoor production activities currently occur throughout the Project Site and would continue to occur with implementation of the Project. However, the noise levels associated with outdoor production activities would be expected to be lower than the existing conditions, due to the reduction in the outdoor area used for studio production activities, such as surface-level parking lots and other outdoor areas at ground level. Also refer to Response to Comment No. 26-146 regarding the noise analysis associated with outdoor production activities. In addition, note that the Project would implement Project Design Feature NOI-PDF-5, which prohibits outdoor production activities within 200 feet of the Shared Eastern Property Line adjacent to the Broadcast Center Apartments during nighttime hours.

Comment No. 247-5

4. What are all the project features it says in the EIR that the studio will use to keep bad things from happening?—everything from greenhouse gasses, to noise, and traffic are dealt with by these features. There doesn't seem to be master list of all of them in the EIR. Who at the city is responsible for keeping track of them? And how do we know they will actually be implemented. And shouldn't we know what the impacts are instead of being masked by something called project features? Please outline what those actual "features" are and what the impacts will be if the features aren't actually built or implemented.

Response to Comment No. 247-5

This comment appears to be discussing the PDFs. All of the proposed PDFs and mitigation measures are listed in Section I, Executive Summary, of the Draft EIR, as well as in each respective section. The PDFs, which are not intended to mitigate impacts, are included in the Mitigation Monitoring Program and are enforceable as conditions of approval for the Project. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR for details regarding timing, enforcement, and actions indicating compliance.

Comment No. 247-6

A lot of people promise a lot of things, but what is important are the mechanisms to make sure they are done. Please let me know what that is.

Response to Comment No. 247-6

Refer to Response to Comment No. 247-5 for a discussion of the enforceability of the PDFs and mitigation measures.

Comment Letter No. 248

Armanda Hernandez
6500 Aria Blvd.
Sandy Springs, GA 30328-3637

Comment No. 248-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 248-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 249

Jesus Hernandez
5830 Myrtle Ave.
Long Beach, CA 90805-4111

Comment No. 249-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 249-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 250

M.E. Hernandez
8261 W. Fourth St.
Los Angeles, CA 90048-4401

Comment No. 250-1

The project just isn't realistic when it comes to public transit and parking. First of all, why does the City think people are going to ride the bus and the subway? You can just look at the cars on the highway and streets and see that virtually everybody drives in their cars alone.

Response to Comment No. 250-1

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

Comment No. 250-2

Secondly, where are all the people going to park? The EIR says more than 5,000 parking spaces are needed, but it's not clear where the overflow parking is going to be—if it's in our community, there should be analysis of the air quality impacts, noise impacts, speed zone impacts, safety impacts, pedestrian impacts, and so on.

Response to Comment No. 250-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is neither proposed for the Project nor is it needed to meet the Project's peak parking demands; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment Letter No. 251

Allen Hershberg
455 N. Formosa Ave.
Los Angeles CA 90036-2524

Comment No. 251-1

I am very concerned about the TVC 2050 project and its impact on the city's history.

Response to Comment No. 251-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 251-2.

Comment No. 251-2

Los Angeles is incredibly storied and millions of people visit every year to see parts of the entertainment industry's past. My understanding is that only a part of this historic CBS building is going to be protected. Why isn't more of the complex going also going to be protected?

The historic part is designated as a Historical-Cultural Monument. If the project were to be approved, the developer changes what gets built from what was approved, does that put the designation at risk? I understand that the designation was based on certain aspects of the iconic building meeting certain criteria. But it seems that some of what is being proposed in the development does not maintain the integrity of the designation, so please explain fully how the integrity of this proposed modern, state of the art development maintains that historic integrity?

Is there a process for ensuring that what led to the protected parts of the site getting the designation in the first place is not going to be compromised? Who is responsibility for overseeing that? What is the process for appealing changes to other older parts of the building that also are historic?

Since there are so many aspects of the development that lack detail, and the developer is asking for flexibility in developing the site, how can we be sure that that flexibility doesn't mean changes to what has been promised regarding the protected part? How can we even know that when changes could be made to aspects of the project?

The city needs to make sure that more of this iconic, legendary building is preserved, as it has a unique and irreplaceable role in the city's television history.

Response to Comment No. 251-2

This comment is nearly identical to Comment No. 186-1. Refer to Response to Comment No. 186-1, above.

Comment Letter No. 252

Maria Hershberg
455 N. Formosa Ave.
Los Angeles, CA 90036-2524

Comment No. 252-1

I didn't see that there was any housing included in this project at 7716–7860 West Beverly Boulevard. We have a huge homeless problem, and we desperately need more housing. Why isn't there any housing included in this project? Isn't the city required to make sure that if a development is proposing to add jobs, housing has to be addressed? Because if there isn't housing for workers who are going to work there, that will just add more cars commuting to work on all the roads in and around that block. Where information about how many people is/are expected to be driving to work there every day? What is going to be done about all the additional workers driving there for work who won't be able to live near where they work?

Response to Comment No. 252-1

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Vehicle trips anticipated to be generated by the Project and the associated impacts on the transportation system are addressed in Section IV.K, Transportation, of the Draft EIR.

Comment No. 252-2

I would appreciate you answering these important questions because the EIR and developer plan does not.

Response to Comment No. 252-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 253

Gabriel Hershoff
164 S. Detroit St.
Los Angeles, CA 90036-2914

Comment No. 253-1

I am writing today to express my deepest concerns about the proposed studio expansion project.

Response to Comment No. 253-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 253-2

My concerns specifically pertain to parking and traffic in the neighborhoods close to the project site.

Response to Comment No. 253-2

Under SB 743, traffic congestion and the adequacy of a new development's parking are not CEQA considerations. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Project's Transportation Assessment (Appendix M.1 of the Draft EIR). As discussed therein, cut-through effects are not environmental impacts under CEQA.

Comment No. 253-3

First of all, an expanded Television City will mean more commuter traffic from workers and cast members headed to the campus. How many are expected on a daily basis? How many days of the week? When will those additional commuters begin working and visiting there? What does your analysis find will be the additional number of cars overall weekly and monthly? Will they be arriving at any time of day? For example, will the site be used 24 hours a day, seven days a week? Will the volume of expected incoming and outgoing traffic differ depending on the day?

Response to Comment No. 253-3

Table 13 on page 123 of the Transportation Assessment shows that the trip generation of the completed Project is expected to generate approximately 9,733 net new vehicle trips over the course of the entire day. Of that total, Table 6 on page 81 of the Transportation Assessment shows that approximately 787 net new trips would occur in the morning peak hour and approximately 855 in the afternoon peak hour.

Trips in and out of the Project Site would occur throughout the day and the studio would operate 24 hours per day, but the nighttime hours and the weekends would be the least busy times. Weekday trips in and out of the Project Site would be comparable on Mondays through Thursdays with fewer trips on Fridays, and even fewer trips on weekends.

Comment No. 253-4

Secondly, the increase in traffic from cars and trucks passing through will mean more noise, more emissions, and more accidents. What does the noise study say will be the increase expected every day, over what it is now? What will the air quality impacts be? Won't this be affect our overall air quality indicators for our community? Please provide that evaluation. What is going to be the impacts on the number of car accidents, bicycle accidents, and pedestrian accidents in this area? The site is located at the intersection of two of the highest injury streets. Will the expected increase in accidents put Beverly and Fairfax in an even higher ranking for high injury streets? What measures are going to be taken to ensure this does not happen and that there will be no increase at all in the number of car, bike and pedestrian accidents, deaths and injuries. Please think about the children and families who call this place their home.

Response to Comment No. 253-4

Air quality and noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. As discussed in Section IV.I, Noise, of the Draft EIR, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. All other air quality and noise impacts, including those associated with Project vehicles, would be less than significant.

The Transportation Assessment acknowledges the location of the Project Site along two of the streets included in the City's High Injury Network, and, for that reason, much of

the Transportation Improvement Program for the Project, summarized in Topical Response No. 15, Transportation Improvement Program, is focused on traffic safety measures. Also refer to Topical Response No. 12, Safety and Congestion, for discussions of pedestrian and vehicle safety. Note however that congestion and collisions are not CEQA impacts.

Pedestrian hazards and traffic safety considerations are discussed in Section C, Traffic Safety vs. Congestion, and Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3. As discussed in detail therein, the Project would include several traffic safety improvements as part of its overall Transportation Improvement Program including traffic signal enhancements, pedestrian control improvements, and pedestrian crossing signals. In addition, the design of each driveway would be reviewed and approved by LADOT as part of the design, regulatory permitting and construction process, and safety issues like safe sight distance and pedestrian control across the signalized locations would be confirmed in the detailed driveway design approval process.

Comment No. 253-5

There has been little to no transparency or communication so far from the developer and their team. It is my sincerest hope that you will evaluate this project based on merit and impact for residents who live in the area, not just the people who commute to work at the studio.

Response to Comment No. 253-5

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment Letter No. 254

Shira Hershoff
164 S. Detroit St.
Los Angeles, CA 90036-2914

Comment No. 254-1

A friend of mine shared the Draft EIR report for the proposed development TVC 2050, or also known as Television City. I am very concerned about the safety and traffic plans for a development project in the Beverly-Fairfax area. Our area has a significant traffic problem and many pedestrians have been involved in unfortunate accidents. There are no specific traffic plans listed, nor what types of trucks will be used.

Response to Comment No. 254-1

Specific traffic safety plans are included in the Transportation Assessment for the Project (Appendix M.1 of the Draft EIR). Much of the Project's Transportation Improvement Program, summarized in Topical Response No. 15, Transportation Improvement Program, is focused on traffic safety measures, including improvements to support the Vision Zero traffic safety program and Transportation Systems Management improvements to upgrade traffic signals in the area. Also refer to Topical Response Nos. 7, Mobility Hub, and 11, Transportation Demand Management, regarding the Project's proposed Mobility Hub and TDM Program.

Pedestrian safety and general traffic safety issues are discussed in Section D, Traffic Safety vs. Congestion, and Section E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3. Regarding trucks, refer to Topical Response No. 14, Construction Vehicle Impacts, and Section E, Truck Trips, of Topical Response No. 10, Trip Generation.

Comment No. 254-2

The proposed timeline for the Television City project also has me and many other residents I have known since my childhood in the Beverly-Fairfax area incredibly concerned. Will this project take 3 years, 10 years, or 25 years to build? It isn't clear to me from the report.

Response to Comment No. 254-2

Refer to Response to Comment No. 9-24 regarding the Project timeline.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 254-3

What does the construction plan look like? Will there be a high volume of trucks? Exactly what kinds of trucks? These are not addressed in the report.

Response to Comment No. 254-3

The construction plans and construction traffic impacts are analyzed in Section 5D of the Transportation Assessment included as Appendix M.1 of the Draft EIR. The truck activity levels during the busiest construction activity periods are discussed in the Transportation Assessment on page 181 where it shows that up to approximately 640 truck trips per day could occur during the excavation and foundation phase of the Project construction. Further details on the construction trip generation for both trucks and cars may be found in Topical Response No. 14, Construction Vehicle Impacts.

Comment No. 254-4

This traffic problem in our area has been and will always be completely unaddressed by the Planning Department in Los Angeles. Does the planning department have a voice in this process? I cannot imagine that they would be impressed with the lack of information in this report.

Response to Comment No. 254-4

The Draft EIR was thoroughly reviewed by the Department of City Planning and the Transportation Assessment (Appendix M.1 of the Draft EIR) was reviewed and approved by LADOT.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project in accordance with CEQA.

Comment No. 254-5

The Television City project is everything that is wrong with development projects in our neighborhood; they increase traffic, pedestrians and children are at risk, and the volume of large trucks polluting the area. I pose the following questions and I would like answers:

Response to Comment No. 254-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 254-6 through 254-9.

Comment No. 254-6

- The project could be built in 3 years or over 20 years or anything in between. How does the city analyze the various impacts based on those wildly different time frames? We could have up to 100,000 delivery, hauling, and dump trucks coming through our already congested community for 25 years.

Response to Comment No. 254-6

Refer to Response to Comment No. 9-24 regarding the Project timeline. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the Project's construction traffic impacts under the 32-month and long-term buildout scenarios. Please note that construction would not occur for 25 years as incorrectly stated in this comment. The Draft EIR analyzed the potential impacts related to construction truck trips in the applicable impact analyses in Section IV.

Comment No. 254-7

- How do you plan to evaluate the noise and air quality over this very vague timeline? How will you plan to evaluate pedestrian safety over multiple decades?

Response to Comment No. 254-7

The comment regarding the timeline is incorrect, as the Draft EIR clearly and consistently discussed the construction timeline. Refer to Response to Comment No. 9-24.

Air quality and noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. These sections analyze air quality and noise impacts under both a 32-month and long-term buildout scenario.

Refer to Response to Comment No. 254-1 above for a discussion of pedestrian safety.

Comment No. 254-8

- How does the community deal with the thousands of construction workers parking in various areas in such a busy area? Where are construction workers going to park?

Response to Comment No. 254-8

The Project Site is large enough that all construction workers would be able to park on the Project Site itself. No off-site parking would be needed to accommodate the parking demands of the construction workers and vehicles. Construction workers would be prohibited from parking off-site as part of the required CTMP prepared pursuant to Project Design Feature TR-PDF-1.

Comment No. 254-9

- How will the site manage thousands of office and studio workers, hundreds of construction workers, thousands of audiences show guests and construction trucks and production trucks?

Response to Comment No. 254-9

This comment does not concern CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 254-10

I am disappointed by the lack of information and would appreciate clarity about Television City. My friends of many years would appreciate it as well.

Response to Comment No. 254-10

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 255

B. Herzhaft
327 1/2 Sierra Bonita Ave.
Los Angeles, CA 90036-2446

Comment No. 255-1

The traffic and parking assumptions in the Draft EIR need to be rethought from the beginning, because they don't even include metro. If this site had been a model for a dense urban area, it would have envisioned public transportation, with housing on-site, and built as much as possible as around the concept of a walkable, car-free space. There should be a new study based on such a concept, that is recirculated.

Response to Comment No. 255-1

Section IV.K, Transportation, of the Draft EIR comprehensively evaluated the potential transportation impacts of the Project using conservative assumptions and supporting evidence, and concluded that impacts would be less than significant. Refer to Topical Response No. 8, Vehicle Miles Traveled, in particular Section C, Assumptions in the VMT Analysis, regarding the specific assumptions used in the Project's VMT analysis in the Draft EIR. These assumptions were reviewed and approved by LADOT.

The location of a Metro station is a regional decision made by Los Angeles Metro and not by a single developer. While the Applicant does not have the authority to determine where Metro stations will be located, the Project would directly connect the proposed Mobility Hub and the Metro D (Purple) Line Wilshire/Fairfax Station, currently under construction, through a dedicated shuttle bus connection. The Project has also located its Mobility Hub to support an additional Metro station along the K (Crenshaw) Line extension. Refer to Topical Response No. 7, Mobility Hub. Refer to Topical Response No. 11, Transportation Demand Management, regarding the proposed TDM Program, which is aimed at reducing single-occupant vehicle trips and encouraging alternative modes of travel.

The underlying purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Thus, the Project does not propose housing. Nevertheless, the comment regarding housing is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment Nos. 16-72 and 16-76 regarding the Project's pedestrian-oriented design.

The Draft EIR comprehensively analyzed the Project in full compliance with CEQA. As such, recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 255-2

Instead, this project will just add to LA's congestion and pollution (emissions from diesel trucks, tens of thousands of commuter cars), a huge drain on already scarce water sources, and the source of even more noise and light pollution.

Response to Comment No. 255-2

Refer to Sections IV.A, Air Quality, IV.I, Noise, IV.K, Transportation, and IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR regarding the comprehensive analysis of the Project's impacts associated with air quality, noise, transportation and water supply. The analysis of air quality impacts included the emissions from trucks and cars and diesel emissions. Please note that, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion is not a CEQA impact. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment. The Project would comply with LAMC requirements regarding lighting that would ensure nearby residential uses would not be impacted by Project lighting.

Comment Letter No. 256

Alan Hirsch
329 N. Fuller Ave.
Los Angeles, CA 90036-2522

Comment No. 256-1

I am a resident of 20 years and I am very concerned with the proposed Television City expansion project. We have not been made aware of just what this project will entail and what the details are, but my understanding is that it will be developed over 20 years, significantly enlarging the current footprint of Television City.

Response to Comment No. 256-1

The Draft EIR analyzed the proposed development program (refer to Table II-2, Proposed Development Program, on page II-13 and Figure II-4, Conceptual Site Plan, on page II-14 of the Draft EIR). In addition, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 256-2

The neighborhood includes multiple schools and nursing facilities. Have these organizations and other types of businesses, not to mention residents, been notified of the increase in truck traffic and car traffic due to construction? What specific information have they been told about the impacts of those increases because someone told me the developer said there were no significant impacts, but there cannot be no impacts with a project like this? What impacts are considered by the city as not significant? Who determines what is significant or not for residents who are affected?

Response to Comment No. 256-2

Noticing for the Project has been conducted in accordance with CEQA. Refer to Response to Comment Nos. 78-2 and 85-3. The Draft EIR is publicly available on the Department of City Planning's website for this Project.

Refer to Section VI, Other CEQA Considerations, of the Draft EIR, which includes a discussion of significant unavoidable impacts, as well as impacts found not to be

significant. Refer to pages VI-20 through VI-35 of the Draft EIR. Appendix G of the CEQA Guidelines establishes the thresholds for analyzing significant impacts under CEQA.

Comment No. 256-3

Are the older buildings of Television City, from the 1960s and early 1970s, considered historic due to the definition of historical resource because that date is 1963. Please explain where that year of 1963 comes from in determining what part of the building is historic.

Response to Comment No. 256-3

Buildings and structures constructed after 1963 were not included in the HCM designation; these buildings were also analyzed as a part of the Draft EIR historical analysis and confirmed not to be historical resources. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance.

Comment Letter No. 257

Susan Hirschhaut
530 N. Harper Ave.
Los Angeles, CA 90048-2223

Comment No. 257-1

I live within the Beverly Fairfax Historic District. The fact that the project's EIR concludes there won't be any effects on our historic district worries me a lot.

Response to Comment No. 257-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 257-2 through 257-4.

Comment No. 257-2

The Project's construction years are discussed in the EIR, but not with any clarity. Is construction going to be for three years? What does it mean that construction could be up to 20 years? Does that mean construction could be going on for 20 years in our community? We are a community of pedestrians, and children and families frequently stroll around our neighborhoods to visit one another's homes and attend religious services. Does the city expect that our lives could be affected by noise, more traffic, trucks all week long, closures, more cars driving through our neighborhood—for up to 20 years?

Response to Comment No. 257-2

Refer to Response to Comment No. 9-24 regarding the Project timeline. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the Project's construction trips and construction traffic impacts under the 32-month and long-term buildout scenarios. Refer to pages IV.I-40 through IV.I-43 in Section IV.I, Noise, of the Draft EIR for an analysis of temporary noise impacts associated with construction haul trucks. Construction lane closures are temporary in nature and would be subject to the requirements of the CTMP prepared pursuant to Project Design Feature TR-PDF-1; see pages IV.K-36 to IV.K-37 in Section IV.K, Transportation, of the Draft EIR.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and

Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 257-3

In addition, it will ruin our way of life and interfere with the very cultural Importance that has made Beverly Fairfax a historic area. Did you evaluate the effect all the construction activities will have on visitors to the historic area boundaries? Where Is that analysis? Can you point to findings that construction trucks and employees are not going to be driving through our communities at all hours of the day and night? When and how will construction trucks will be routed? Will trucks being using an entrance that runs along Fairfax, pulling out into traffic to get to the freeway?

Response to Comment No. 257-3

The Draft EIR fully evaluated all potential environmental impacts associated with construction and operation of the Project in accordance with CEQA. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project would not result in significant impacts to the Beverly Fairfax Historic District or other historical resources in the Project Site vicinity.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes. Construction of the Project would also include safety features as part of the CTMP described in Topical Response No. 14. These include an ingress/egress plan for trucks depending on the construction phase of the Project (also to be reviewed and approved by LADOT), notification of upcoming construction activity to nearby residents and businesses, a designated construction manager to field concerns form neighbors, sidewalk protective barriers, and field traffic managers to control construction traffic to minimize impacts on adjacent street traffic and pedestrian flow. Refer to pages IV.K-36 and IV.K-37 in Section IV.K, Transportation, of the Draft EIR.

The routing of construction trucks does intend to utilize Project driveways along both Fairfax Avenue and Beverly Boulevard. Trucks turning in and out of the Beverly driveway would be assisted by the existing traffic signal. Trucks turning in and out of the Fairfax driveway may need to be assisted by flag persons to complete their turns during busy times

of the day. Note that existing, but unused, driveways along Beverly Boulevard would remain inoperable during construction.

Comment No. 257-4

This project is expected to bring in close to 7,000 new workers regularly and countless other tourists, increasing traffic and congestion and making it harder for us to stroll pleasantly with our family. What is the city going to do about ensuring the enjoyment of our community is not altered dramatically? There must be measures that will be taken because there is no way we won't be impacted? Is the city basically saying to the residents of our wonderful community too bad, we just have to live with the impacts? What about the increased risk that safety in our neighborhood will be compromised, where walking is a major part of what goes on there?

In the years that the project is being built, there will be sidewalk closures and other pedestrian obstacles, according to the EIR's transportation section. I want to know which sidewalks will be closed and for how long, given the pedestrian aspect of our community and culture? The community's ability to get to the synagogue and other significant cultural events can be severely hampered by the closure of a sidewalk.

Response to Comment No. 257-4

The first paragraph of this comment is identical to Comment Nos. 202-1 through 202-4. Refer to Response to Comment Nos. 202-1 through 202-4, above.

The second paragraph of this comment is identical to Comment No. 202-5. Refer to Response to Comment No. 202-5, above.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 257-5

I'm hoping that the City would consider how the project will affect our lives, our cultural history, and our safety before making a decision. Please inform me of any city actions about this project.

Response to Comment No. 257-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-

makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 257-2 through 257-4. All commenters are added to the notification list for the Project.

Comment Letter No. 258

Lisa Hoffman
119 S. Alta Vista Blvd.
Los Angeles, CA 90036-2823

Comment No. 258-1

I have lived in the Beverly-Fairfax neighborhood for years and I have never been so disappointed to be a resident of this community.

Response to Comment No. 258-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 258-2 through 258-4.

Comment No. 258-2

I understand that traffic comes with the territory as an L.A. resident and I have put up with this traffic for years, but I simply must draw the line at this absurd television city plan being presented to the city.

Response to Comment No. 258-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 258-3

It is not that I am opposed to all new developments, but I am opposed to construction without any sort of public report on the implications of this project. I know there will be lots of trucks on the streets, lane closures, and detours.

Why has the public not seen a report on this information? How are we supposed to support a project when we are missing the aforementioned important details? Why the lack of transparency? Probably because all of the construction will cause even more traffic than we already have, and the city knows that, which is why they are keeping important details from us. I am tired of sitting in my car in a traffic standstill because some developer says we need to build more. Enough with the construction if we want to actually make traffic better in Los Angeles.

Response to Comment No. 258-3

The Draft EIR is the public report disclosing the potential environmental impacts of the Project. Noticing for the Project has been conducted in accordance with CEQA. Refer to Response to Comment No. 32-3.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the proposed development program.

Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction. Refer to Topical Response No. 10, Trip Generation, regarding the trips generated by operation.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). The Draft EIR and the Transportation Assessment analyzed the potential transportation impacts of the Project in accordance with CEQA and, based on the criteria in Appendix G of the CEQA Guidelines, concluded that the Project would have less-than-significant transportation impacts.

Comment No. 258-4

However, this goes beyond my own personal dissatisfaction with L.A. traffic. The city is using unsubstantiated number to assert the benefits of this project. The city claims 15% of staff and visitors will be taking public transportation to the site instead of driving, making traffic less of a problem. Sure, 15% sounds nice but where did that number come from? How do we know that it is accurate? And if it is not 15%, what will the developer do to address that? Are we just supposed to say "oh well, they tried" if only 5% of people going to the site take public transit?

Response to Comment No. 258-4

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 regarding the 15-percent trip adjustment and the effectiveness of TDM programs.

Comment No. 258-5

The people of Los Angeles and Beverly-Fairfax will not be manipulated into believing numbers with no real backing or explanation. I am tired of the lack of transparency on the part of the city. Shame on you for allowing the possible permitting of this project before providing full information to the public. Shame on you for trying to trick the public by throwing out statistics with further explanation or basis. Shame on you for ignoring the interests of residents, commuters, and small business owners in the area could be heavily impacted by this project.

Response to Comment No. 258-5

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 259

Robert Hoffman
119 S. Alta Vista Blvd.
Los Angeles, CA 90036-2823

Comment No. 259-1

I have been reviewing the environmental impact report for the proposed plan to develop the Television City property. I have a number of questions and concerns with respect to the transportation and traffic aspects of the project.

Response to Comment No. 259-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 259-2 through 259-6.

Comment No. 259-2

It seems that the date you studied transportation and traffic for this project was October 2021. Traffic patterns during Covid were not typical, with so much business shut down and so many people still working from home. When will you be re-doing the traffic study? If not, why wouldn't the city be doing that? Did you compare October 2021 assumptions and findings with a period of time that was before the pandemic began, so that your baseline reflected a normal time for this area? Aren't the numbers you are using artificially low and different?

Response to Comment No. 259-2

The traffic counts used in the Transportation Assessment (Appendix M.1 of the Draft EIR) were conducted before the pandemic and, therefore, represent typical traffic flow conditions on the streets in the Study Area. Page 26 of the Transportation Assessment states that the existing conditions traffic levels were based on traffic counts conducted in September 2019, well before the pandemic began. An annual growth factor was applied to these 2019 counts to reflect 2021 conditions. The traffic counts used in the Transportation Assessment represent conservative (i.e., high) estimates of traffic conditions in 2021 because the traffic count levels today in 2023 have still not reached the pre-pandemic 2019 levels.

Comment No. 259-3

The transportation assessment you conducted appears to be based on the project being completed in a 30-month construction period, but why were impacts not analyzed for the possible construction timeline to 2043? How can the EIR not identify and evaluate all of the impacts for the entire potential timeline, on what basis is that alright and acceptable to do? The plan does not account for impacts that could, in fact, result from 20 years of construction, so when will a transportation analysis be done for the other 17 years of potential construction?

Response to Comment No. 259-3

The Transportation Assessment analyzed a 32-month construction period, which represents the worst-case condition in terms of construction traffic impacts, as well as a longer buildout to 2043. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

The long-range transportation impacts of the completed, operating Project are covered by the VMT analysis, which is provided on pages IV.K-73 through IV.K-78 in Section IV.K, Transportation, of the Draft EIR, and the Transportation Assessment included as Appendix M.1 of the Draft EIR.

Comment No. 259-4

The draft EIR references a .25 mile radius for the transportation analysis, but why would such a small radius be acceptable for the basis of a non-typical, highly traveled motorist project? The impacts of this project will be felt for a much greater distance than a ¼ of a mile. The project has far-reaching, major consequences for traffic in and around the area. While the study included 31 intersections, what about the intersections outside of the limited study area? The increased traffic associated with a project of this scale and size will impact intersections for a great distance from the site; traffic will get backed up and bottleneck at intersections.

Response to Comment No. 259-4

Refer to Response to Comment Nos. 28-12, 28-14, and 26-156 regarding the Study Area analyzed in the Transportation Assessment. The comment suggesting that the Study Area should have been larger and included analysis of more intersections is incorrect for many reasons. First, the intersection analysis is not a CEQA requirement. Second, the Study Area was identified in accordance with guidelines provided in the TAG. Third, Project trips disperse and have a diminishing effect on any single location the farther they are from the Project Site, and the Study Area was chosen to include locations with a concentration of Project trips (the TAG recommends including locations carrying at least

100 peak hour Project trips). The Study Area stretches from Melrose Avenue to Wilshire Boulevard and from Crescent Heights Boulevard to La Brea Avenue, an area of approximately 1.5 miles by 1.25 miles. Beyond this Study Area, Project trips would dissipate to the point that they would no longer create meaningful operational effects on nearby major intersections.

The Study Area for the VMT portion of the analysis includes the entire metropolitan area because it tracks employee trips from their home to the Project Site. The VMT analysis uses the Los Angeles General Plan transportation demand forecast model, which is, in turn, based on SCAG's transportation model. The SCAG long-range model is the basis for transportation planning in the Southern California multi-county region.

Comment No. 259-5

In addition to the 21 streets and highways that will provide regional and local access to the project site, what about the adjacent and peripheral streets outside of the study area that will be affected by the congestion and gridlock? How can you dismiss the widespread effects given what an already traffic-burdened area this is at and surrounding the project site?

Response to Comment No. 259-5

Refer to Response to Comment No. 9-29 regarding traffic hazards. As concluded in the Initial Study (included in Appendix A of the Draft EIR), the Project would have a less-than-significant impact related to increased hazards due to a design feature, and no further analysis of this topic was required in the Draft EIR. Nonetheless, a detailed analysis of the Project access plans as it relates to hazards due to geometric design features, including safety, operational, or capacity impacts under Threshold T-3, was provided in Section 4C of the Transportation Assessment. As detailed therein, all Project access points would be designed to provide adequate sight distance and, where necessary, pedestrian refuge areas to limit any potential vehicular-pedestrian and vehicular-bicycle conflicts. Two of the driveways on Beverly Boulevard would function as secondary vehicular access and limited to right-turn in/out only with minimal traffic usage. In addition to improvements surrounding the Project Site perimeter, the Project would contribute toward several offsite improvements that would benefit pedestrians, vehicles, and the surrounding neighborhood, including pedestrian safety improvements in the Study Area as part of Vision Zero, traffic calming measures and neighborhood bicycle features, traffic signal upgrades, etc. The Project access and improvements would not preclude or interfere with any City implementation of any future improvements.

Refer to Topical Response No. 15, Transportation Improvement Program, for a list of the improvements included in the Project's improvement program. Note that much of the

program is based on pedestrian and vehicular safety, including Vision Zero and Transportation Systems Management improvements.

Comment No. 259-6

What specific and additional mitigation is being proposed to address the more dangerous travel and intersections of the three High Injury Network streets of Beverly Blvd., Fairfax Ave., and West 3rd Street? The project site itself is located at the intersection of two of HIN streets! Is that even permitted to happen? It defies logic that the city would allow this kind of project at that kind of a location, one that is bringing thousands of workers, staff and visitors driving thousands of cars and trucks to the site.

Response to Comment No. 259-6

Refer to Response to Comment Nos. 9-29 and 259-5 regarding traffic hazards. As concluded in the Initial Study (included in Appendix A of the Draft EIR), the Project would have a less-than-significant impact related to increased hazards due to a design feature, and no mitigation measures were required. No further analysis of this topic was required in the Draft EIR.

Comment No. 259-7

Thank you for addressing my questions and concerns.

Response to Comment No. 259-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 259-2 through 259-6.

Comment Letter No. 260

Shawn Holden
101 N. Gardner St.
Los Angeles, CA 90036-2719

Comment No. 260-1

I am writing to you because I feel the Draft EIR did not adequately define “The Project.”

Response to Comment No. 260-1

The Project Description meets the requirements of CEQA. Refer to Response to Comment No. 5-3, and to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Comment No. 260-2

I reviewed the executive summary and then the project description but I still do not know what the project is. There are multiple caveats throughout the Draft EIR indicating that the project is only conceptual. How is the public supposed to comment on a “make-believe” project if it is subject to change. If the conceptual project changes, then our comments on the Draft EIR would be useless and a waste of time.

If the project is only conceptual, when will the public have an opportunity to comment on the “real” project and its environmental impacts? When will the community be advised of any modifications to the conceptual project? Will this information be posted on a website? Should the project’s proposed development agreement be approved, does that mean that the community may have to wait decades to be informed of the actual project?

Please define the project in concrete terms and recirculate the Draft EIR so the public has an opportunity to make productive comments on impacts to the community.

Response to Comment No. 260-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, the level of detail required in an EIR for a specific plan project, how all of the physical aspects of the Project were fully disclosed and analyzed in accordance with CEQA, and the required discretionary process (which includes subsequent CEQA compliance review) for future changes that are substantially different than the Project that was analyzed in the EIR. As discussed therein, the Project Description in the Draft EIR is

accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. Refer to Response to Comment No. 9-24 regarding the Project timeline.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that “significant new information” as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 261

Monica Hong
242 S. Detroit St.
Los Angeles, CA 90036-3034

Comment No. 261-1

I am writing to you today with my thoughts on the recently released Draft Environmental Report for the Television City Project. As a long-time, 15 year resident of Beverly Fairfax community, I feel that I have a stake in the outcome of this project. As a result, I would like to express my concerns and ask questions about the DEIR. I hope that you all take the time to address each of my questions and concerns in detail.

Response to Comment No. 261-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 261-2 through 261-6.

Comment No. 261-2

As we all know, Beverly Fairfax is already a highly populated area. With 14 proposed stages, many of which will house audiences, thousands of additional people could be onsite each day! Has the public been given a solid number on how many people can be on-site? Will all of the stages be used at the same time?

Response to Comment No. 261-2

This comment is identical to a portion of Comment No. 106-2. Refer to Response to Comment No. 106-2.

Comment No. 261-3

What happens when audience members and employees try to park for shows? From the [sic] it seems there will only be 5,300 parking spaces for potentially 13,300 people. Aren't those parking spaces for employees also? How exactly will that work? Can someone please outline this for me?

Response to Comment No. 261-3

This comment is identical to a portion of Comment No. 106-2. Refer to Response to Comment No. 106-2, above.

Comment No. 261-4

With more people comes more crime. What does the evaluation show about expected increases in crimes? What kinds of crimes in particular? What measures will be taken to ensure the safety of our children with more people being in the neighborhood? Additionally, more people means an increased opportunity for crimes in Beverly Fairfax at night, when it seems most of the shows will be taking place. What will be done to combat this increased crime rate? Will the city deploy more police officers to Beverly Fairfax on nights with shows? More cars speeding through our neighborhoods can be detrimental to their health and safety. Has an analysis on this been done? If so, what were the findings? If not, when and how will it be conducted?

Response to Comment No. 261-4

This comment is identical to Comment No. 106-3. Refer to Response to Comment No. 106-3, above.

Comment No. 261-5

Additionally, we are fortunate to have multiple historic structures and an entire historic district in Beverly Fairfax. I don't think the DEIR did a good enough job of evaluating the impacts of a potentially extra hundred thousand people on our history. Will the project overwhelm the Adobe and Farmers Market? Please explain your claim in detail. I would like to see the study and hard data that backs up your claim.

Response to Comment No. 261-5

This comment is identical to a portion of Comment No. 106-4. Refer to Response to Comment No. 106-4, above.

Comment No. 261-6

What about the historic district itself—what will happen to it if thousands of cars drive through it every single day? What about parking in the historic district, will there be any restrictions? Will people be allowed to park in the historic district?

Response to Comment No. 261-6

This comment is identical to a portion of Comment No. 106-4. Refer to Response to Comment No. 106-4, above.

Comment No. 261-7

Again, I really hope you all take time to answer each of my questions in detail. I'm really concerned about the outcome of this project, and I feel like as a resident, I have the right to know how it will actually impact my life.

Response to Comment No. 261-7

This comment is identical to Comment No. 106-5. Refer to Response to Comment No. 106-5, above.

Comment Letter No. 262

Alexandra Hook
724 N. Spaulding Ave.
Los Angeles, CA 90046-7422

Comment No. 262-1

The project located at 7716–7860 West Beverly Boulevard, Los Angeles, California 90036 seems extreme.

Response to Comment No. 262-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 262-2 through 262-3.

Comment No. 262-2

So many schools, residences, and nursing homes along Fairfax will be impacted by constant traffic. And the project is proposing to stage thousands of trucks next to Loyola High, the recreation center right next to the high school, and Kaiser Hospital, which seems like the worse thing possible for young people and patients. Have these residents been told that there may be 60,000 trucks idling and driving through their communities? This area by Loyola in particular is a lower income community. Why are you putting trucks for your project in that community?

Please provide an analysis of all of the possible impacts on these communities, including a health risk analysis on the impacts to these communities, and please include the environmental impact.

Response to Comment No. 262-2

There is no longer a plan to stage haul trucks near Kaiser Hospital or Loyola High School. All haul trucks would be staged on the Project Site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 262-3

And why isn't housing included in the project? We desperately need more housing, and not all this new office and warehouse space.

Response to Comment No. 262-3

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment Letter No. 263

Ana Horzowitz
222 S. Formosa Ave.
Los Angeles, CA 90036-2814

Comment No. 263-1

The Television City Draft EIR is not clear. It does not show all the ways the construction project would affect residents of Beverly Fairfax and the surrounding neighborhoods, all of whom will be affected as well. Please help me understand these specifics.

Response to Comment No. 263-1

Section IV, Environmental Impact Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts during both construction and operation. The environmental impact conclusions in Section IV are summarized in Table I-1 in Section I, Executive Summary, of the Draft EIR.

This comment does not raise an environmental issue specific to CEQA or the Draft EIR. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 263-2

For example, the parking and traffic situation during construction is not fully explained. During construction, where will the many 18-wheelers go on their way into and out of the site? It seems they would have to line up along the residential streets in Beverly Fairfax. How will this work? How will they turn into traffic when exiting? And how will they be able to make wide enough turns to enter?

Response to Comment No. 263-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 26-E.4-15 for a discussion of truck movements at the Project Site. The primary entrance and exit for construction trucks would be from Fairfax Avenue and at the signalized intersection of Beverly and Genesee.

Construction trucks would not be allowed to use residential streets to stage or to travel. All haul truck staging will take place on the Project Site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Trucks turning in or out of the Project Site on Fairfax Avenue may need traffic flag persons to assist them in completing their turns during busy times of the day.

Comment No. 263-3

I am concerned about air pollution and poor air quality in the neighborhood. And the trucks will be carrying dirt and debris from excavation as well as construction materials, which carry additional risks to pedestrians and residents. What was found in the analysis of those risks and potential impacts?

Response to Comment No. 263-3

As shown in Tables IV.A-10 and IV.A-11 of the Draft EIR, after the application of mitigation, localized air quality impacts, including particulate (i.e., dust) impacts, would not exceed SCAQMD LST thresholds, and impacts would be less than significant. Refer to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust.

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, which includes mandatory control actions and dust control contingency measures to control fugitive dust.

Comment No. 263-4

If there are truck routes prescribed by the developer and city, what are they? And how will they be enforced?

Response to Comment No. 263-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Comment No. 263-5

Later, the development will be the workplace for thousands more employees than currently work there. I can see that the parking spaces in the plan number about 5,300. This does not match up with potentially 8000 employees plus the many audience members who will be visiting, which could be up to 5,000 additional people per day. How will the developer account for the thousands of additional vehicles? Are they also supposed to park on the street? Is the intention for them to park in the spaces being built? How does that impact the people who live in the neighborhood?

Response to Comment No. 263-5

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

While the Project is estimated to employ approximately 7,832 total employees based on the LADOT VMT Calculator as shown in Table IV.K-5 of the Draft EIR, the parking supply does not need to match the number of employees working on the Project Site for several reasons: (1) not every employee will be on-site on any given day; (2) not every employee will drive to work; and (3) not every employee who does drive to work will drive alone. Topical Response No. 11, Transportation Demand Management, explains the programs that the Project would implement to encourage Project employees, visitors, and audience members to travel via non-auto choices. Topical Response No. 7, Mobility Hub, explains the key role that the Mobility Hub would play in reducing automobile travel to/from the Project Site, thereby reducing the number of parking spaces needed on-site and reducing the number of auto trips on the roadways serving the area.

The comment regarding the number of audience visitors is incorrect. Refer to Topical Response No. 10, Trip Generation, regarding Project trips.

Comment No. 263-6

Besides parking, the many additional vehicles will potentially harm the residents, as well. With such a great increase in traffic, there will be increased safety risks and public health impacts due to the additional emissions. How does the EIR address these impacts? How was the analysis made? What are the impacts both during construction and upon the project's completion, based on the current and projected community population and workforce?

Response to Comment No. 263-6

The methodologies employed to address Project air quality impacts are presented in pages IV.A-39 through IV.A-47 in Section IV.A, Air Quality, of the Draft EIR. Impacts, after the application of applicable mitigations, are presented in Tables IV.A-7, IV.A-8, IV.A-10, IV.A-11, and IV.A-12 in Section IV.A, Air Quality, of the Draft EIR. As discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips associated with the Project would not approach screening levels in which localized CO levels might exceed 1-hour CO ambient concentration standards or result in health effects.

Refer to Response to Comment No. 9-29 regarding the Project's less-than-significant impacts related to traffic hazards.

Comment No. 263-7

I saw reference to a Mobility Hub. There are so few people who actually use public transit in this city, so why is this being proposed? What exactly is the plan for the Mobility Hub?

Response to Comment No. 263-7

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips. Mobility Hub functions would be located on-site to support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and to support other modes of travel and TDM strategies that are likely to evolve over time. These features would be promoted and incentivized through programs administered by an on-site TDM coordinator and one or more transportation information kiosks, including within the Mobility Hub itself.

Comment No. 263-8

How will it work, and who will police it? Will there be protections for the neighbors so that it does not become another safety risk with additional traffic and more people?

Response to Comment No. 263-8

With regard to the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 263-9

Thank you for your attention to my concerns.

Response to Comment No. 263-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 263-1 through 263-8.

Comment Letter No. 264

Mario Horzowitz
222 S. Formosa Ave.
Los Angeles, CA 90036-2814

Comment No. 264-1

I would like to submit comments about the plan for TVC 2050. It seems many elements of the plan lack specific information and details.

Response to Comment No. 264-1

The Project Description meets the requirements of CEQA. Refer to Response to Comment No. 5-3, and to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Comment No. 264-2

First, what are the phases of how this project will be built? What is the actual timeline? How can a project state it could be three years of construction, but then it could be twenty years of construction? How are impacts analyzed when the construction time is still not made clear? A detailed phase plan with a timeline is a necessity and needs to be provided for the residents and businesses in the area.

Response to Comment No. 264-2

Refer to Response to Comment No. 9-24 regarding the Project timeline. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project.

Comment No. 264-3

I do not understand the difference between the project design features and mitigation measures. What are the differences? Why are some referenced as possibly to be done, as though it is up to the developer to do or not do? Please specify all of the known project design features. Then specify all of the mitigation measures the developer is agreeing to do. There is nothing that shows the real impacts after construction and then those mitigation measures.

Response to Comment No. 264-3

Refer to Response to Comment No. 9-34 regarding the difference between PDFs and mitigation measures, and that the PDFs in the Draft EIR are correctly identified as such. The PDFs and mitigation measures are listed on pages I-17 to I-37 in Section I, Executive Summary, of the Draft EIR. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR for details regarding implementation and enforcement.

The commenter's claim that the Project's impacts after construction are not disclosed is incorrect. Each section of the Draft EIR includes a thorough analysis of impacts during both construction and operation, as well as any required mitigation measures, and the level of significance after mitigation.

Comment No. 264-4

Next, does this project not have the same issues as the big project in Hollywood, the Millennium project? Can you please explain why you put out an EIR that went against what the court said in the Millennium project defining what can and cannot be done in the city?

Response to Comment No. 264-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13. As discussed therein, the *Millennium* case is not applicable to the Project, and the Project Description is distinguishable from the project description at issue in *Millennium*.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 264-5

Last, the circulation system that is currently planned makes no sense. It would seem no cars and trucks will be able to navigate the area in the basement, is that right? Or is that the ground floor of a parking structure? The analysis needs to show that cars and trucks will be able to use the gates on Beverly and Grove Drive. What will happen if the cars and trucks cannot navigate this area?

Response to Comment No. 264-5

Please note that internal circulation is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Figure 1 on page 11 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the overall site plan, and Figure 2B on page 13 of the Transportation Assessment shows the vehicular access system for the Project. Figure 22 on page 80 of the Transportation Assessment shows the volume of vehicles using each driveway on the Project Site.

Refer to Response to Comment No. 136-2 regarding the multi-level internal circulation system. The internal circulation plan would allow a vehicle to efficiently and safely enter the Project Site at any of the three signalized driveways and travel to any point in the Project Site. This would allow Project trips to leave the adjoining street system as soon as possible and circulate and maneuver within the Project Site. There would be a connection across the Project Site on the first underground level that would allow cars and trucks to move between the east and the west sides of the Project Site. In the Conceptual Site Plan, this connection is located to the north of the Primary Studio Complex. Connections between the ground level and the first underground level would be provided throughout the Project Site.

Comment No. 264-6

These are just a few of the many questions I have after doing further research on the project. Please respond to my questions and concerns, and please do not go through with the project.

Response to Comment No. 264-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 264-2 through 264-5.

Comment Letter No. 265

Donna Houston
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 265-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 265-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 266

Mary Huth
344 S. Sycamore Ave.
Los Angeles, CA 90036-3006

Comment No. 266-1

I am writing about the plans to alter the Television City Studios and make this area more “new and improved.” After trying to get through parts of the Draft EIR, I noted several potential issues with this project, but especially those involving the expected increase in cars to the area and traffic.

Response to Comment No. 266-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 266-2 through 266-5.

Comment No. 266-2

There is not enough adequate parking for the amount of people that will be in the area. One of the specific groups that requires ample parking is the audience members. What time are you planning for the audience members to arrive at and then leave the studio? Is parking being provided to audience members? Will it be paid parking? What happens when attendees just want to park for free in the neighborhood, how will that be monitored? If they need to arrive when employees are still there, and there already is not enough parking in the planned garage for even the total number of employees, what about audience members then having to find parking?

Response to Comment No. 266-2

Under SB 743, the adequacy of a new development’s parking supply is not a CEQA consideration. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Parking fees, if any, for on-site employees would be paid on a monthly basis by either the employee or the tenant. Visitor and audience parking would be paid by the company being visited or by the show producer. No parking fees would be collected at the inbound guard booths. Project parking in the neighborhoods would be controlled by time

limits and/or by Residential Parking Permits which would be developed/modified along with the neighbors as part of the NTMP.

Comment No. 266-3

Along with being a residential area, there is also a historic district just to the north of the project site. If the project gets built, there will be thousands upon thousands of cars and trucks traveling through the community. How is this going to impact the historic district? Has any thought been given to this? It is well known that cut-through traffic is a major problem in our neighborhoods. Where is the complete analysis about that through-traffic expected?

Response to Comment No. 266-3

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10 regarding impacts to the Beverly Fairfax Historic District and how the potential increase in trips will not affect the integrity of the Beverly Fairfax Historic District.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, in particular Section B in the Topical Response, regarding non-CEQA measures that would be implemented to address cut-through trips.

Comment No. 266-4

Why is there not a route for the trucks hauling away demolition debris, dirt and trash? I also noticed that there are many different options for the trucks. Will they be going through the residential areas? Having truck exhaust and fumes next to houses, apartments, condos, etc. is not ideal under any circumstances. Have you looked into the effect this will have on the health of those residents in the area? It also looks as if there is no way for the truck paths to be enforced. What are you going to do to ensure that they stay on the designated paths so that the citizens can continue living their normal lives?

Response to Comment No. 266-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 9-22, 107-2, and 124-6 regarding construction haul routes and construction traffic impacts. As discussed therein, three haul routes were selected to comprehensively analyze the potential haul routes and ensure all associated environmental impacts were evaluated in the Draft EIR. Topical Response No. 14 also includes a discussion of air quality impacts as a result of hauling, and, as discussed therein, localized air quality impacts as a result of hauling activities would be less than significant. Also refer to the quantitative HRA included as Appendix FEIR-10 of this Final EIR, which was prepared in

response to comments on the Draft EIR and confirms that construction and operation of the Project would not result in significant impacts associated with health risk. The haul truck routes would be enforced by LAPD and the City, contrary to the commenter's assertion. No local residential streets would be used for any construction truck movement.

Comment No. 266-5

I also don't understand the Vehicle Miles Traveled analysis. There are assumptions about people using transportation, but where can this information be confirmed? How many people took public transportation pre-COVID? I believe the best data can be drawn from these statistics. The Vehicle Miles Traveled also only takes into consideration the workers. Why did you not take into account the tourists that will be in the area? What about the delivery trucks?

Response to Comment No. 266-5

Refer to Response to Comment No. 209-7 for a discussion of VMT. Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions and data used in the VMT analysis for the Project. Refer also to Topical Response No. 11, Transportation Demand Management, regarding transit and TDM effectiveness.

The City of Los Angeles established work VMT per employee as the criterion against which to measure the transportation environmental impacts of a proposed employment project. This criterion is consistent with CEQA requirements. The City used its long-range travel demand forecast model to evaluate the distribution of existing and future jobs and homes in order to predict the travel distances for employees travelling to the Project Site. The existing onsite employee travel patterns, as well as the future travel patterns, were projected by the City's model, and, therefore, the current usage of public transit by the existing onsite employees is not a critical piece of information as suggested in the comment. The evaluation measure of work VMT per employee is based on vehicle miles of travel by the employees from their homes to the Project Site, and this criterion does not include visitor or truck trips. As discussed in Section A, Appropriateness of Using VMT Calculator, of Topical Response No. 8, visitor and studio audience trips would make up a small percentage of the total trips to/from the Project Site. A detailed discussion of truck trips may be found in Section E, Truck Trips, of Topical Response No. 10, Trip Generation. However, the definition of work VMT per employee specifically excludes truck trips from the calculation.

The Project is a studio project and, given the security needs of a studio, would not be open to the public. Therefore, the comment regarding tourists is incorrect. Additionally, the traffic counts used in the Transportation Assessment (Appendix M.1 of the Draft EIR) were conducted before the pandemic and therefore represent typical traffic flow conditions

on the streets in the Study Area, which would be generally inclusive of tourist activity in the area, although tourist vehicles are not differentiated. Refer to Appendix B, Intersection Traffic Volume Data, of the Transportation Assessment (Appendix M.1 of the Draft EIR) for further information regarding traffic counts.

Comment No. 266-6

These are just a few examples of issues that I see in this plan. You do not need to support this plan if you want what is best for the Beverly Fairfax area.

Response to Comment No. 266-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 266-2 through 266-5.

Comment Letter No. 267

Elizabeth Hutton
ehutton44@gmail.com

Comment No. 267-1

I'm writing to express my support for Television City's TVC 2050 project. The iconic studio needs an upgrade, and this modernization effort will do a lot to help the entertainment industry grow. For several years we've seen a decline in production activity in Los Angeles.

Having modern, state-of-the-art facilities right here in the center of LA will really help the business grow. Since so many of us are touched by the magic of the creative entertainment industry, this project really is a win-win for all Angelenos.

As a resident of the neighborhood, I hope to see this project move forward quickly since it will preserve the studio's legacy while keeping entertainment jobs in Los Angeles

Response to Comment No. 267-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 268

Jerry Ickovic
459 N. Poinsettia Pl.
Los Angeles, CA 90036-2504

Comment No. 268-1

If developed, the Television City plan will change our neighborhood and community in ways that we will not recover from. What is being proposed is something that will never fit into our community and onto that size of property. It will change the character, look and feel of a place that is iconic and has long been a part of our neighborhood.

Response to Comment No. 268-1

Refer to Response to Comment No. 5-8 regarding the size of the Project.

Pursuant to Public Resources Code Section 21099, because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 31 through 40 of the Initial Study. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 268-2

How can the developer be saying that construction is estimated to take three years but then also be asking for a 20-year agreement? What is a development agreement? Isn't the plan the developer submitted the agreement to build? How is the community supposed to understand what all the impacts will be if the building of the project could go until 2043? Would construction start and then stop? Or is it possible that construction could be going on for actually 20 years? What other projects in the area are also planned during those 20 years? How are we supposed to know what the aggregate impacts of any multiple projects along with the Television City one are going to be? Where is that information available for us to review?

Response to Comment No. 268-2

Refer to Response to Comment Nos. 9-24 and 28-7 regarding the Project timeline and proposed Development Agreement. As discussed therein, as with most development

projects, market conditions will ultimately influence the buildout timeframe of the Project. As discussed throughout the Draft EIR, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. However, the Project does not propose continuous construction for 20 years. A development agreement is a voluntary contract between a local municipality, such as a city or county, and a property owner whose land is located within the municipality's jurisdiction. The development agreement contains the obligations of both parties and lays out the various standards and conditions that will control development of the subject property. To be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is included for each of the environmental topics studied in Section IV the Draft EIR.

As stated throughout the Draft EIR, the Development Agreement would confer a vested right to develop the Project in accordance with the proposed Specific Plan and Mitigation Monitoring Program throughout the term of the Development Agreement. The proposed Specific Plan and Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable PDFs and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Please note that the Development Agreement would only allow for development consistent with the approved Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Other provisions of the Development Agreement would be contractual issues between the City and the Applicant which do not constitute physical impacts on the environment.

A list of development projects in the vicinity of the Project Site that were considered in the cumulative impact analyses for each environmental topic analyzed in the Draft EIR is provided in Table III-2 on pages III-9 through III-14 in Section III, Environmental Setting, of the Draft EIR. The locations of the development projects considered in the cumulative impact analyses are shown on Figure III-1 on page III-15 of the Draft EIR.

Comment No. 268-3

When will meetings be held in the area neighborhoods to help residents better understand what could be built and the effects? Is the city only going to hold what is a minimum required number of meetings? Why wouldn't you want the community to be really well informed? Why doesn't the city require the applicant to hold more public meetings in order to really get meaningful input?

Response to Comment No. 268-3

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment Letter No. 269

Jodi Jackson
523 N. Orlando Ave.
Los Angeles, CA 90048-2528

Comment No. 269-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 269-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 270

Lior Jacob
934 N. Genesee Ave.
West Hollywood, CA 90046-7346

Comment No. 270-1

For a city that already has a major lack of parking space, I am having a lot of trouble comprehending where these extra 5,000+ parking spots will be for the proposed Television City site. The EIR says the spots may be offsite. Does that mean offsite parking spots will be in my neighborhood? I don't understand why the location of these spots are not disclosed. Are they going to be parking garages or parking lots? Is this going to mean I won't be able to park in my own neighborhood or will be an obstacle getting places?

Response to Comment No. 270-1

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 270-2

My community is full of families, and I know they will not feel comfortable having speeding cars rushing to get to work. How will speeding issues of so many more cars commuting to the new development be handled? What about those commuters using side streets and neighborhood streets to get to the property to avoid the gridlock on the main streets? We already see that happening now, even without the proposed development.

Response to Comment No. 270-2

This comment is identical to Comment No. 85-2. Refer to Response to Comment No. 85-2, above.

Comment No. 270-3

I feel like this adds a ton of safety issues too concerning the impact on air quality and pedestrian safety. What will this surplus of cars do to LA's already damaged ozone? Thousands of additional cars on the road cannot be healthy or be acceptable in terms of traffic. Please address this in more detail before the plan is approved. The Television City project is failing to address potential environmental factors. Not only this, but it has failed to acknowledge that the increased congestion will pose health and safety concerns. The city is already extremely overcrowded, and traffic poses an everyday issue.

Response to Comment No. 270-3

This comment is identical to a portion of Comment No. 85-3. Refer to Response to Comment No. 85-3, above.

Comment No. 270-4

When will the draft EIR be revised to address these concerns in more detail than was provided? The public can barely get through such a long and technical document, especially to be able to make sure we are being given real answers about the expected impacts to our neighborhood. When will you be holding community meetings to explain in layman terms what is being planned and what the consequences will be?

Response to Comment No. 270-4

As demonstrated in Response to Comment Nos. 270-1 through 270-3, and 270-5 through 270-8, below, the Draft EIR and public noticing process meet the requirements of CEQA and recirculation is not required. Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

With respect to what is being proposed, as discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day required under CEQA. Following the publication of this Final EIR, the Project and EIR will be considered during public hearings and meetings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings. Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

Comment No. 270-5

Parking garages and lots are the third most common location for violent crimes in the US. How is this supposed to make me feel knowing there will be multiple added within walking distance of my home? What measures are going to [sic] implemented to ensure the children of our community are safe?

Response to Comment No. 270-5

This comment is identical to Comment No. 85-4. Please see Response to Comment No. 85-4, above.

Comment No. 270-6

What has the city done to assess the noise concerns?

Response to Comment No. 270-6

This comment is identical to Comment No. 85-5. Refer to Response to Comment No. 85-5, above.

Comment No. 270-7

Was the nearly 2 million square feet of space not enough for this project since now there is a need for offsite parking? These parking garages and spots are likely to tarnish and possibly even take over spots that make LA a community.

Response to Comment No. 270-7

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR. Refer to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply.

Comment No. 270-8

This is known as a historic district, but our neighborhood will not be nearly as desirable when havoc takes over. What did your studies show about the effects on property values? What about the impacts on rents? And on home prices? How can you put a price on the impacts to the historic district?

Response to Comment No. 270-8

This comment is identical to Comment 85-7. Refer to Response to Comment No. 85-7, above.

Comment No. 270-9

Please consider these issues and draft an EIR that answers these questions. My community deserves to know what the future of our neighborhoods entail.

Response to Comment No. 270-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-

makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 270-1 through 270-8.

Comment Letter No. 271

Daniel James
321 S. Burnside Ave.
Los Angeles, CA 90036-3269

Comment No. 271-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 271-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 272

Stuart James
350 S. Cloverdale Ave.
Los Angeles, CA 90036-3472

Comment No. 272-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 272-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 273

Tim Jones
336 N. Mansfield Ave.
Los Angeles CA 90036-2624

Comment No. 273-1

Is there absolutely no regard for the environment, sustainability or natural resources in our community and in the city of LA? California is supposed to serve as a leader for climate issues; however, we have the worst air pollution in the country. It is absolutely incomprehensible that the city would ever allow a project like TVC2050 that would directly negatively impact the environment and deplete the land of resources.

Response to Comment No. 273-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Discussions as to why the Project is being proposed notwithstanding significant and unavoidable impacts are presented in Section VI, Other CEQA Considerations, of the Draft EIR.

Comment No. 273-2

Our city struggles as it is in terms of water pollution and municipal water supply. What percentage of water is locally sourced in Los Angeles? How much of that water is already sourced from the Beverly Fairfax area? How much water is going to be required and used for the project?

Response to Comment No. 273-2

With regard to the percentage of water that is locally sourced in the City, as discussed on page IV.M.1-17 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, local groundwater provided approximately eight percent of the total water supply for Los Angeles from fiscal year-end 2016 to fiscal year-end 2020. Regarding how much of that water is sourced from the Beverly Fairfax area, LADWP pumps groundwater from the San Fernando Basin and, to a lesser extent, the Central Basin and Sylmar Basin. As discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR, the Project Site is located within the Hollywood Basin. Per the 2020 LADWP UWMP, LADWP does not currently use groundwater from the Hollywood Basin. Therefore, none of the locally sourced water supply is sourced from the Beverly Fairfax area.

Refer to Response to Comment Nos. 16-66 and 26-175 with regard to the amount of water the Project would require and the adequacy of the water supply to serve the Project.

Comment No. 273-3

This project involves the pulling of immense groundwater—which is deeply concerning. What impact does taking that water have on the use of that groundwater for drinking water and why is there no discussion of this in the EIR?

Response to Comment No. 273-3

The Project is not anticipated to result in a significant impact related to groundwater supplies. Refer to Response to Comment No. 3-7 regarding groundwater quality and Response to Comment No. 26-112 regarding groundwater use. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Draft EIR's analysis of groundwater quality.

Comment No. 273-4

Our region regularly fails to meet federal air quality standards due to high levels of ozone pollution and smog. This project is bound to emit carbon dioxide, methane and other waste products that pollute the air and further damage the ozone. The thousands of additional trucks and cars are going to produce smog. Before the Television City project even begins, the construction sector contributes to 23% of air pollution, 50% of the climatic change, 40% of drinking water pollution, and 50% of landfill wastes. How do you plan to study how these percentages will change during the construction of this project?

Response to Comment No. 273-4

Table IV.A-1 (Ambient Air Quality Standards) on page IV.A-3 of the Draft EIR acknowledges that the Air Basin is non-attainment for ozone. This comment provides unsourced construction sector percentages of air pollution and climatic change. However, these percentages do not relate to the CEQA significance thresholds from Appendix G of the CEQA Guidelines used in the Draft EIR. The Project's air quality impacts and GHG impacts are analyzed as required by CEQA in Section IV.A, Air Quality, and Section IV.E, Greenhouse Gas Emissions, of the Draft EIR, respectively.

Comment No. 273-5

A project of this scale is devastating to our environment and catastrophic to our health. In an area with such immense tar and methane, why is it necessary to go 45 feet into the ground? What is the point in building these underground studios that will risk build ups and

potentially even explosions? What is going to be uncovered in the soil and how do we know that we are safe? How regularly will you be testing the soil? We are told in the EIR that a plan will be provided, but where is it? The community needs to review it and ensure that we feel safe. What precautions are going to be enforced to make sure we are not harmed? Why is this information not disclosed in the EIR?

Response to Comment No. 273-5

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-87 with regard to the La Brea Tar Pits and subsurface gases.

Refer to Section II, Project Description, of the Draft EIR for a description of the Project analyzed in the Draft EIR.

Comment No. 273-6

This project's construction phase is subject to last 20 years. I understand that the city is trying to make up for lost revenue, but killing the climate and risking out health is not the answer.

Response to Comment No. 273-6

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 273-1 through 273-5.

Comment Letter No. 274

Kat Juda
katjuda@yahoo.com

Comment No. 274-1

Please help stop the Regional Center designation build.

Response to Comment No. 274-1

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 274-2

It would be a disaster for our community that is already filled with too much traffic, congestion and issues that need addressing in the area.

Response to Comment No. 274-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 274-3

This project needs to be stopped and come up with a plan that isn't as intrusive to the neighbors and community. Thank you!

Response to Comment No. 274-3

The comment, which concludes the comment letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 274-1 and 274-2.

Comment Letter No. 275

James K.
329 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 275-1

I have many questions regarding the proposed Television City Studio plan. I believe the current proposal has extremely poor planning and no reasoning or thought process whatsoever.

Response to Comment No. 275-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 275-2 through 275-4.

Comment No. 275-2

My first of many concerns is the close proximity of the proposed plan and the La Brea Tar Pits. Why would the development be considered when it is so close to the tar pits? It seems extremely obvious that digging 45 feet across a 25-acre site will uncover many finds. How was the 45 feet depth for digging determined? I have not seen a detailed plan for dealing with this issue once it arises. Do you have a plan for this? If so, what is it? Why has it not been released to the public? A detailed plan needs to be provided to the public.

Response to Comment No. 275-2

Section IV.D, Geology and Soils, of the Draft EIR included an analysis of the Project's potential to impact paleontological resources. Refer to Response to Comment No. 35-90 for a detailed summary of the analysis contained in the Draft EIR. As discussed on pages IV.D-15 and IV.D-16 of the Draft EIR, the Project Site is approximately 4,000 feet to the north of Hancock Park and the La Brea Tar Pits. Based on the analysis contained in the Draft EIR, the Project would implement Mitigation Measure GEO-MM-1, which requires that a paleontologist be retained to prepare a Paleontological Resource Mitigation and Treatment Plan for the Project. Refer to Response to Comment No. 35-91 for a discussion of Mitigation Measure GEO-MM-1.

The maximum depth of excavation of 45 feet is based on the Project analyzed in the Draft EIR, as discussed on pages II-1, II-15, and II-34; Table II-2, Proposed Development Program, on page II-13; and Figure II-4, Conceptual Site Plan, on page II-14 of Section II, Project Description. As discussed in Section IV.D, Geology and Soils, of the Draft EIR, excavations up to 45 feet in depth could potentially disturb previously undiscovered paleontological resources. To address potential impacts to paleontological resources, paleontological monitoring would be required during ground disturbance activities within high sensitivity deposits (e.g., Pleistocene age deposits), per Mitigation Measure GEO-MM-1 and as revised (refer to Response to Comment No. 35-91). The monitoring program would follow the guidelines outlined by the SVP and include sediment sampling protocols for microfossil recovery. No monitoring would be required during excavation within artificial fill, as these deposits do not contain paleontological resources in their original stratigraphic context and thus have a low sensitivity. With the implementation of Mitigation Measure GEO-MM-1, Project-level impacts to unique paleontological resources would be reduced to a less-than-significant level.

The comment regarding the consideration of the development does not relate to the Draft EIR's analysis of environmental impacts, and no further response is required. Nevertheless, this comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Refer to Response to Comment No. 109-2 for a discussion of the public availability of such plans as the Paleontological Resource Mitigation and Treatment Plan.

Comment No. 275-3

The La Brea Tar Pits are full of tar and methane, and it can be extremely risky and harmful to the environment if excavated. Did the EIR evaluate the amount of gas that will be released as a result of the excavation? If so, where is the analysis? What was the analysis based on? The excavation plan should be of concern to the entire community.

Response to Comment No. 275-3

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-87 regarding the La Brea Tar Pits and subsurface gases.

Comment No. 275-4

Another concern I have is where are all the people going to park? The EIR says 5,000+ parking spaces are being planned, but then it continues to say that the parking spaces may be off offsite. Where is offsite? Why is offsite parking of any kind needed if all those parking spaces are going to be added to the project? Will the offsite parking be in the

neighborhoods? Will they take away our parks? Let's say that parking offsite did proceed. Will offsite parking be done seven days a week and any hour of the day? Will there be a limit as to how long offsite parking is going to be permitted? Have you looked at what will happen to the air quality with the additional parking needed offsite? You also need to factor in pedestrians, speeding, and other impacts of off-site parking—have these been considered? There needs to be a detailed analysis over these issues.

Response to Comment No. 275-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 275-5

Please take all of the questions into consideration. Everyone's goal is for the betterment of the Beverly-Fairfax area. Do what you can to protect it and its citizens. Please do not support this project.

Response to Comment No. 275-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 275-2 through 275-4.

Comment Letter No. 276

Cheryl Kanekar
cherylkanekar@yahoo.com

Comment No. 276-1

My husband and I live 2 blocks from the CBS lot on Beverly Blvd. I'd like to share my thoughts and questions about the proposed development. I support high-density, mixed-use urban planning centered around public transit (trains, buses running at very high frequencies all day and night), walking and bicycling.

Response to Comment No. 276-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 276-2

I don't see any concrete plans to increase public transit in the area. If the development encourages car usage, then our already-clogged sluggish streets will slow down to a stop, and air pollution and noise pollution will be unbearable.

There are only 4 buses right around CBS (14, 217, 16, 218) and they run at low frequencies of 10 minutes or more, and they are even more infrequent after weekday hours. We need way more bus and tram/train lines connecting us to more parts of the region than just downtown (where most of the buses go). The buses need to run at 5 minutes or less, to be usable. The Purple Line extension is not remotely enough to meet this need.

Cars need to be strongly dis-incentivized. We should not be giving over our precious land for parking lots & garages, aiding the poisoning of our air.

Response to Comment No. 276-2

The Project does not propose any changes to public transit in the area. Any such changes are the responsibility of transit agencies. However, Figure 12 on page 43 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the location of the bus routes serving the Project Site. Transit service in the Project area includes six local Metro buses, one Rapid Bus line, one DASH line, and one CityRide line. Table 3 on page 57 of the Transportation Assessment shows the frequency of the various lines indicating service

frequency between 8 and 40 minutes. In addition, the Metro D (Purple) Line Wilshire/Fairfax Station would be open for service before the Project opens and will have a frequency of 10 minutes. This station would be connected to the Project Site by a shuttle bus system running between the subway station and the Project's Mobility Hub.

Tables 4A and 4B on pages 58 and 59 of the Transportation Assessment show that the current bus system has approximately 2,000 available bus seats in both the morning and afternoon peak hours that could serve Project transit trips.

Comment No. 276-3

Secondly, will there be any tree coverage mandated in this development? We have a pattern of developers in the area cutting down old shade trees and leaving blocks barren and desert-like. What does the city require of developers in this area?

Response to Comment No. 276-3

As discussed in Section II, Project Description, of the Draft EIR, a minimum of approximately 28,900 square feet of open space would be located along the Project Site boundaries and would include landscaping, such as trees and shrubs. Additionally, as discussed on page VI-23 of Section VI, Other CEQA Considerations, of the Draft EIR, a total of 181 trees were inventoried on and surrounding the Project Site, including 62 private property trees/palms, 88 off-site trees whose canopies overhang the Project Site, and 31 street trees. None of the trees within the Project Site are protected under the City of Los Angeles Native Tree Protection Ordinance. To allow for development of the Project Site, all 62 of the existing on-site trees and three street trees would be removed as part of the Project and replaced in compliance with applicable City requirements. All other trees would be avoided or preserved in place. The on-site trees are to be removed and replaced at a 1:1 ratio, and the street trees are to be removed and replaced at a 2:1 basis in accordance with City requirements.

Comment No. 276-4

I'd appreciate it if you could address these concerns.

Response to Comment No. 276-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 276-2 and 276-3.

Comment Letter No. 277

Ron Kaplan
445 N. Kilkea Dr.
Los Angeles, CA 90048-2228

Comment No. 277-1

Please explain how the Television City expansion project will be laid out. The Draft EIR lacks a lot of detail about the buildings, sound stages, parking, and other aspects of the proposal. I have some concerns I am requested that you address:

Response to Comment No. 277-1

The Project Description meets the requirements of CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR analyzed the proposed development program (refer to pages II-12 through II-35 of the Draft EIR and specifically Table II-2, Proposed Development Program, on page II-13). Future Project changes that are substantially different than the proposed Project or are beyond the scope of impacts evaluated in the EIR would require additional City review and approval, as well as CEQA compliance review. Refer also to Response to Comment No. 5-5 regarding the layout of the Project.

Comment No. 277-2

- I understand that many billboards will be placed throughout and surrounding the site. What size billboards and how many? Where will billboards be located? Please show where these will be located and how they will be lit? Nighttime signage could impact animals. The lighting and energy used for signs was not included in the report. Where is the analysis of those?

Response to Comment No. 277-2

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the signage proposed as part of the Project and how the physical components of the proposed Sign District were adequately described and analyzed in the EIR. Billboards displaying any message directing attention to a business, product, service, profession, commodity, activity, event, person, institution, or any other commercial message, which is generally conducted, sold, manufactured, produced, offered, or occurs elsewhere than on the premises where the sign is located are considered off-site signs, which would be prohibited by the proposed Sign District.

Regarding the energy use and calculations for the signage, refer to Response to Comment No. 102-6. Please also see pages II-30 through II-32 in Section II, Project Description, of the Draft EIR regarding proposed signage and lighting for the Project.

As discussed on pages 44–48 of the Initial Study included in Appendix A of the Draft EIR, the Project Site is located in an urbanized area and is currently developed with the Television City studio. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas and the lack of habitat in the Project area, it is unlikely that any sensitive animal species would be present and affected by the Project.

Refer to Response to Comment No. 213-4 regarding the potential lighting impacts on wildlife.

This comment discusses information related to aesthetic impacts. As described in Section 4.I on pages 30–31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact,” unless evaluation is required under other land use regulations in the LAMC. An evaluation of aesthetic impacts is not required under the LAMC. Therefore, no further analysis was required in the Draft EIR for this topic. However, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 277-3

- Outdoor gatherings are expected events and I would like more information about where Television City would allow these. Nighttime parties across from residences would be noisy and disruptive. How does the developer plan to approach this common occurrence and protect the people who live near the project? How often would they be held? What kinds of outdoor gatherings? Will there be a limit of what types of events would be allowed?

Response to Comment No. 277-3

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 66-5 with regard to special events. Topical Response No. 3 also provides a discussion of how special events would continue to be governed by the LAMC, consistent with existing conditions. Also refer to Response to Comment No. 26-146 regarding outdoor noise and the overall reduction in areas used for outdoor production activities.

Refer to pages IV.I-43 through IV.I-48 of Section IV.I, Noise, of the Draft EIR for an analysis of noise associated with operation of the Project including noise from outdoor gatherings. As demonstrated therein, noise impacts associated with operation of the Project would be less than significant.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 277-4

- The Mobility Hub mentioned is not something most people are familiar with. What is a Mobility Hub? It sounds as though it is more than a bus stop? Who is expected will use it? It sounds like it could be a very busy place, and there are many safety concerns for this ambiguous facility. Who decided a hub of this kind was needed in our neighborhood? Will buses, taxis and ride shares be a part of it? No one came to speak with me about it.

Response to Comment No. 277-4

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the function and the operation of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips. Mobility Hub functions would be located on-site to support first/last mile connections; encourage employee and visitor use of public transit through the provision of a shuttle service, carpooling, vanpooling, and biking/scooter to work; and to support other modes of travel and TDM strategies that are likely to evolve over time. These features would be promoted and incentivized through programs administered by an on-site TDM coordinator and one or more transportation information kiosks, including within the Mobility Hub itself.

The Mobility Hub would be a private facility serving the Project Site and it would be controlled by the Project's security personnel. Pursuant to Project Design Feature POL-PDF-2, the Project would be required to prepare a 24/7 security plan. Refer to page IV.J.2-12 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR.

Comment No. 277-5

- The streets that surround the property can't hold more people and more traffic, especially on Grove Dr., Beverly Blvd and Fairfax, and West 3rd. Was the fact that these main streets are already so busy considered? Wasn't the fact that the corner where Erewhon and the post office are located is a crazy busy intersection considered? Cars trying to turn in either direction onto Beverly from

Grove typically can't do that in one light. And drivers have a terrible time trying to get out of the post office parking lot, into traffic in both directions. What is going to be done about the gridlock there already? There will be potentially thousands of workers, visitors, audiences to the studios, and others driving trying to get through traffic to get to the site and then to the parking garage.

Response to Comment No. 277-5

This comment discusses the general traffic conditions in the area and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR) acknowledges that the area around the Project Site has intersections that perform at a poor LOS. That fact was considered in the evaluation of the VMT CEQA issues and the non-CEQA LOS operational evaluation. Table 18 in the Transportation Assessment shows that none of the 31 study intersections operating at LOS D or better experienced a downgrade to LOS E or F.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, for a more detailed description of the performance of the street system serving the area.

Comment No. 277-6

- Will the buildings for this expansion be 15 or 20 stories high, which? How was that height decided? Where will those tall buildings be located?

Response to Comment No. 277-6

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed in Topical Response No. 1 and Response to Comment Nos. 11-3 and 26-7, the Project includes height zone, stepback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. These requirements are not currently required under the existing zoning code. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, stepbacks, and frontage areas associated with the Project. The massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Refer also to Response to Comment No. 11-3 regarding the height of the Project.

Comment No. 277-7

With this imprecise information, it seems the developer is keeping so many options open for the project. This is not helpful for people in the community who want to understand what is proposed to be built in the neighborhood. The EIR needs to be cleaned up and more specific. It is unfair for Angelenos to be kept in the dark

Response to Comment No. 277-7

Refer to Response to Comment No. 277-1 above regarding the adequacy of the Project Description. Also, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, a ministerial process for implementation of the proposed development program, and a discretionary process for future Project changes that are materially different than the proposed Project. See the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website for this Project.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 278

Vikki Karan
422 N. Laurel Ave.
Los Angeles, CA 90048-2351

Comment No. 278-1

I know a shady deal when I see one, and by golly this fits the bill. This Draft EIR is insufficient in its transparency regarding project benefits and past agreements with the project developer. This needs to be recirculated in the community so people are aware of this, or rather, aware of all that this is missing.

I read about a settlement agreement between the LA Conservancy and the project's developer. This gave me a lot of pause. What is that agreement? Does it influence the deal they have made here? Is the developer paying the Conservancy? This just seems immensely unknown and potentially dangerous to me. If we are being asked to provide public comment, we need the whole truth, and right now we don't have a grain of it. How can the City and community understand what these issues are if no one has been provided the Settlement Agreement.

Response to Comment No. 278-1

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and fulfills CEQA's purpose as an informational document that allows for meaningful public participation. Furthermore, the Draft EIR reflects the independent judgment of the City.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 278-2

The Draft EIR has stated that the developer's return on investment is a project objective. What about the community the project is going to dramatically change? Since the Developer has included ROI as an objective, we should know how much that could be. If

this is about helping out the local area, I can't see how at this point, since no numbers have been given.

Response to Comment No. 278-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 278-3

This proposal is frankly incomplete and insufficient. There are so many unanswered questions provided here that just don't add up. I know the community needs more information before any sort of decision can be made. If this dramatic change is being proposed, we need to know all the implications and potential outcomes that could occur.

Response to Comment No. 278-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 278-1 and 278-2.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and comprehensively analyzed all potential environmental impacts associated with the Project.

Comment Letter No. 279

Shira Karsen
315 N. Gardener St.
Los Angeles, CA 90036-5713

Comment No. 279-1

This project sounds totally wrong for our community and I can't imagine that anyone who lives here would welcome it.

Response to Comment No. 279-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 279-2

We haven't even seen a timeline of the phases—when will excavation start and when will it end? How long should we expect huge trucks to be hauling out dirt? Is construction really planned to last for 20 years? That seems unbelievable. When does the construction phase start? What is the permissible noise level for construction? What time of day does construction start and end? Will the roads have to be widened to accommodate all of these trucks and influx of cars? If so, we deserve to see a master plan that clearly shows every phase.

Response to Comment No. 279-2

The Draft EIR studies the most intensive scenario for the construction of the Project—a one-phase construction program lasting approximately 32 months. The 32-month schedule would concentrate the construction activity in one phase and assume Project buildout in 2026 as opposed to a long-term buildout of the Project within the 20-year term of the Development Agreement, which was also analyzed in the Draft EIR. As discussed on page II-33 of Section II, Project Description, of the Draft EIR, construction could begin as soon as 2023 and end as soon as 2026. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

The construction schedule is included in Appendix B of the Draft EIR (pdf page 32), and is also discussed further in Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR. Television City is a working studio, and constant construction would not be operationally compatible.

The significance criteria for each sensitive noise receptor, along with existing and anticipated noise levels, are provided as part of the Project's noise analysis included in Section IV.I, Noise, of the Draft EIR. Refer specifically to Table IV.I-10 on page IV.I-39 of the Draft EIR for unmitigated noise levels and Table IV.I-19 on page IV.I-58 of the Draft EIR for mitigated noise levels.

In accordance with LAMC requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays. Construction activities outside of these hours would be permitted only if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners.

Topical Response No. 14, Construction Vehicle Impacts, details the number of trucks and employee vehicles expected on the busiest construction days. The number of construction-related vehicles on even the peak days would not be enough to require widening of the streets serving the Project Site.

The Project's Transportation Improvement Program, detailed in Tables 23 and 24 on pages 190 and 191 of the Transportation Assessment (Appendix M.1 of the Draft EIR) list the improvements to be made by the Project. There is no plan to do any widening of area streets to accommodate the Project beyond a two-foot-wide widening along The Grove Drive Project frontage to accommodate a left turn lane into the Project driveway. Instead, operational improvements and traffic signal enhancements would be implemented.

Comment Letter No. 280

Pearl Katz
175 S. Detroit St.
Los Angeles, CA 90036-2913

Comment No. 280-1

The Television City expansion project proposed is a big concern for me. As a member in this community, I am uncertain of the size and scope of this development and the EIR leaves significant information out, so I request further details on several areas of the project.

Response to Comment No. 280-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Regarding the scope and details of the proposed development of the Project Site, refer to Response to Comment No. 5-3 and Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Specific issues raised by the commenter are addressed in Response to Comment Nos. 280-2 through 280-6.

Comment No. 280-2

For example, the plan states that digging will be 45 feet deep. The EIR's analysis states that 700,000 cubic yards will be removed and that there will be limited dewatering. How is this possible, with such shallow groundwater levels in this area? The term "limited" seems inaccurate. With a construction timeline of two dozen years, dewatering seems highly likely to be significant. As water is removed, where will it be taken? Will the water contain contaminants? This area also contains oil, so what will happen to the chemicals and dangerous elements that will be disturbed in the process of excavation?

Response to Comment No. 280-2

As concluded in the Draft EIR, impacts related to temporary dewatering would be less than significant. Refer to Response to Comment Nos. 3-7 and 11-5 for a discussion of construction dewatering, including the potential to encounter groundwater contaminants and compliance with discharge permits. The proposed below grade parking structures will be designed to resist hydrostatic pressure, such that a permanent dewatering system (post-construction dewatering) will not be required. Refer also to Response to Comment No. 11-25 regarding the quantity of groundwater to be extracted and the duration of dewatering. Refer to Response to Comment No. 9-24 regarding the construction timeline. Refer to Response to Comment No. 16-64 for a summary of how the extracted

groundwater would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal method.

Refer to Response to Comment Nos. 13-4, 16-64, and 26-80 regarding the tar collection system and the testing and disposal requirements for any impacted soil.

Comment No. 280-3

A major safety hazard not addressed is the potential for sink holes. With removal of groundwater and shifting soil, how likely is this? Groundwater is a precious resource in our state. What analysis of the impact to nearby homes was considered in the EIR?

Response to Comment No. 280-3

Refer to Response to Comment Nos. 16-74, 16-85 and 26-69 regarding dewatering as it relates to subsidence and to Response to Comment No. 11-25 regarding the quantity of groundwater to be extracted.

Comment No. 280-4

The EIR does not adequately address the construction timeframe. If the building takes up to 25 years, will the traffic, noise, and more disrupt life in this neighborhood for that long? Even if the construction only lasts a few years, which is still a long time in the life of a resident, how did the EIR demonstrate these impacts adequately for such a variance in the timing of the potential construction?

Response to Comment No. 280-4

Refer to Response to Comment No. 9-24 regarding the Project's buildout timeline and Response to Comment No. 26-138 regarding the construction timeline related to noise. Refer to pages IV.K-36 to IV.K-37 of Section IV.K, Transportation, of the Draft EIR regarding the CTMP that would be implemented as part of the Project to provide safe and efficient movement of construction vehicles.

Comment No. 280-5

The thousands of trucks driving with construction materials and debris, dump trucks, deliveries, and for other purposes are going to create traffic unlike any in this area. Such a huge project will require fleet upon fleet of trucks that will drive on our streets, causing delays, accidents, congestion, pollution, loud noise, and other negative impacts. How the traffic, pollution, safety, and noise analyzed were based on the lack of timeline/variance in possible construction?

Response to Comment No. 280-5

A complete analysis of construction traffic impacts was included in the Transportation Assessment included as Appendix M.1 of the Draft EIR. Refer to Section 5D, pages 179 through 184 therein. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the impacts of construction trucks and construction worker vehicles on the traffic conditions along the roadways serving the Project Site. As discussed therein, Project trip generation during construction would be less than the Project when fully operational and, thus, would have a lesser effect on traffic than the Project as analyzed in the Transportation Assessment and Draft EIR.

The Draft EIR analyzed the worst-case condition in terms of construction impacts (i.e., a one-phase construction effort in which the entire Project would be constructed in a 32-month time period) as well as a long-term buildout scenario. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, impact thresholds relative to changes in driver delay are no longer applicable to identify transportation-related impacts under CEQA. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

The Draft EIR CEQA analyses of transportation, pollution, safety, and noise are analyzed in Sections IV.K, Transportation; IV.A, Air Quality; IV.E, Greenhouse Gas Emissions; IV.J.1, Public Services—Fire Protection, and IV.J.2, Public Services—Police Protection; and IV.I, Noise, respectively.

Comment No. 280-6

Please explain the findings that states there will be no significant impact to the residents of this community?

Response to Comment No. 280-6

This comment incorrectly claims no significant impacts were identified in the Draft EIR. Refer to Section I, Executive Summary, and Section VI, Other CEQA Considerations, of the Draft EIR for summaries of the Project's significant and unavoidable impacts. Detailed analyses supporting these conclusions are provided throughout Section IV, Environmental Impact Analysis, of the Draft EIR.

Comment Letter No. 281

Shalom Katz
175 S. Detroit St.
Los Angeles, CA 90036-2913

Comment No. 281-1

I am writing to ask about the current planning and permitting regarding the TV City 2050 plan. I've looked through the materials that were made available to access, but I cannot seem to find many specifics on what the development will actually look like or entail.

Response to Comment No. 281-1

The Project Description meets the requirements of CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR analyzed the proposed development program (refer to pages II-12 through II-35 of the Draft EIR and specifically Table II-2, Proposed Development Program, on page II-13). Future Project changes that are substantially different than the proposed Project or are beyond the scope of impacts evaluated in the EIR would require additional City review and approval, as well as CEQA compliance review.

Comment No. 281-2

The EIR discusses a Specific Plan, which I would like to see. As far as I can tell though, there are no specifics. What will happen to existing zoning under this proposed plan? (which we have no way to see before it goes up for approval). What General Plan provisions apply to this development? What other local regulations are applicable for what is being proposed?

Response to Comment No. 281-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-15, and 9-16 with regard to the Project Description and proposed Specific Plan, how neither CEQA nor City policy requires the Specific Plan to be included in the EIR, the level of detail required for a specific plan project EIR, how the Draft EIR disclosed and analyzed all physical elements of the Project in accordance with CEQA, and the regulatory process under the Preliminary Draft Specific Plan, which has been made publicly available in response to comments on the Draft EIR prior to the publication of this Final EIR. Refer also to Response to Comment No. 281-4, below.

Refer to Response to Comment No. 26-22 regarding the relationship of the proposed Specific Plan to the LAMC and the Draft EIR's CEQA analysis of the Project's consistency with the LAMC, General Plan, and other applicable land use plans.

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Response to Comment Nos. 28-13 and 32-3 regarding the public outreach that has been conducted and the noticing of the Project in compliance with CEQA. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the typical 45-day period required under CEQA. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Comment No. 281-3

Is it true that there structures up to 20 stories tall will be allowed? How are we supposed to find out about the business uses that will be there? When will we know more specifics about what has been decided? I would like to know how the community is to provide input on this project if the developers do not even know what will it be developed? Is it expected that the community would support a development that is very general in nature? What about not knowing more details about the impacts?

Response to Comment No. 281-3

Refer to Response to Comment Nos. 281-2 and 281-4 regarding the Project Description. Refer also to Response to Comment Nos. 11-3 and 26-7 regarding the height of the Project.

Comment No. 281-4

That leads into another question; who does know what is being developed? My fear is that the developer can amend that plan as they please, which means the community will have no avenues for making their voices heard as development continues. So does the plan exist? Have you seen it? If so, then can you share some of the actual specifics with us? I feel that would do a lot to increase the trust in this project.

Response to Comment No. 281-4

Refer to Response to Comment No. 281-2 regarding the Project Description. As discussed throughout all sections in the Draft EIR, the Project is a studio project that would include sound stage, production support, production office, general office, and retail uses. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Topical Response No. 3, Permitted On-Site Uses. As discussed in Topical Response No. 1, the Draft EIR disclosed all of the elements of the Project required by CEQA and provided a comprehensive analysis of the Project. The proposed Specific Plan is not necessary for evaluation of the Project. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR. Please note that the proposed Specific Plan incorporates all of the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of the Final EIR. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 281-5

As it is, I cannot support it, as I do not even know what I would be supporting.

Response to Comment No. 281-5

Refer to Response to Comment No. 281-1 regarding adequacy of the Project Description. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 282

Daniel Kessons
6646 Drexel Ave.
Los Angeles, CA 90048-4209

Comment No. 282-1

I recently learned about some concerning details regarding the Television City renovations. My major concerns are the length of this project and the lack of transparency regarding its approval.

Response to Comment No. 282-1

Regarding the length of the Project, refer to Response to Comment No. 9-24 regarding the buildout timeline. Regarding transparency surrounding its potential approval, refer to Response to Comment No. 32-3, which discusses Project outreach, noticing, and future public hearings.

Comment No. 282-2

I had not received any notifications regarding the approval process for this project, and yet now I hear that it's being fast-tracked for approval. I think this is a gross breach of public trust, and any approvals should be delayed until the public has appropriate time to hear about the potential impacts of this project. After all, I understand the developer is asking for a 20-year timeframe for the project.

Why would the city approve a project that could cause impacts to the area for 20 years? Are the impacts going to be worse over that timeframe? How is the community supposed to understand exactly what the impacts are going to be for each of those and cumulatively over that period?

That is an incredible amount of time to be building something without proper oversight from the community. I have not heard about any community benefits offered to ensure the community will benefit, or at least not be harmed, by this development. I'd urge you to pause this plan until the community has an appropriate amount of time to actually understand how the neighborhood will change with this huge development. After all, you're here to represent us and not Hollywood elites, right?

Response to Comment No. 282-2

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing. Based on the commenter's address, they appear to be outside the required notification radius. However, as stated therein, the Applicant has engaged in an extensive public outreach program.

As stated throughout the Draft EIR, while Project buildout is anticipated in 2026, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. Accordingly, in addition to analyzing the 32-month construction schedule, the Draft EIR analyzed the Project's impacts associated with a long-term buildout for each of the environmental impact areas analyzed in Section IV of the Draft EIR. Refer to Table I-1 in Section I, Executive Summary, of the Draft EIR for a summary of all of the environmental impact conclusions for the Project.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 283

Annette Kiene
531 Pier Ave., Spc. 32
Hermosa Beach, CA 90254-3830

Comment No. 283-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 283-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 284

Daniel Kim
418 S. Sycamore Ave.
Los Angeles, CA 90036-3506

Comment No. 284-1

I am reaching out in regards to the Environmental Impact Review and my concerns of the TVC project. Like many residents in the Beverly Fairfax area, I am very concerned about the transformation to my community from this massive development. This letter outlines a few of my concerns as well as raises questions to better understand the project's initiatives.

Response to Comment No. 284-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 284-2

After reading about what occurred between the Los Angeles Conservancy and the developers, I am confused. We need more transparency.

Response to Comment No. 284-2

Refer to Response to Comment No. 26-19. As discussed therein, pursuant to CEQA Guidelines Section 15002(c), the confidential agreement between the Applicant and the Los Angeles Conservancy is an agreement between private parties and is therefore not required by CEQA to be discussed or analyzed in the EIR.

Comment No. 284-3

- What happened in the agreement between the Los Angeles Conservancy and the developer for the project?
- What changes occurred for the project?
- Why is the Los Angeles Conservancy making deals with the project in advance of the EIR and input from the community? What if the community does not agree with the terms of their agreement?
- How much money will the developers be paying the Los Angeles Conservancy?

Response to Comment No. 284-3

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

Comment No. 284-4

The developers include information that their return on their investment is a “project objective.” This statement does not provide a comprehensive understanding to community members of what the project will contribute. I am requesting financial information about the project to be made available to the public.

- What are the expected returns of the development in 10 years? 20 years? And longer term?
- What does the return depend on? Full use of the different planned uses? What if the uses change because the developer is asking for flexibility?
- How much return is considered for the project to be viable? Where is the analysis of costs to the community of the impacts versus the return due to the developer? How and when does the city make the determination that the return outweighs the costs to the community?
- Who are the top five individual investors in the company? I believe it is important to know who these people are so that we are informed about who is “investing” in our community.
- Will and how much of the developers’ return will be invested back into the immediate community? I want to know how community members and low income residents could benefit from the project.

Response to Comment No. 284-4

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 284-5

It is important that this information is circulated to the public prior to approval and construction of the development. This project will transform our community and make Television City an almost unrecognizable site. It will inevitably disrupt the way of life of many residents. I would like to be kept informed on project updates and changes in addition to response to my concerns.

Response to Comment No. 284-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 284-2 through 284-4. All commenters are added to the notification list for the Project.

Comment Letter No. 285

Julie Kim
403 S. Orange Dr.
Los Angeles, CA 90036-3509

Comment No. 285-1

I am worried about the environmental consequences of this project. As a community resident, I need to know the plans to transform my community will not destroy it in the process.

Response to Comment No. 285-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 285-2 through 285-4.

Comment No. 285-2

In the DEIR, I read that the developers are planning to excavate down about 45 feet, removing over 700,000 cubic yards of dirt. I kept reading to see if there was any more information about any of the potential impacts, yet there are just two pages failing to provide a meaningful analysis.

Excavating down nearly 45 feet will likely lead to the discovery of historic resources. Archaeological excavation takes patience, and discovering dinosaur bones or other artifacts may occur. How will the developers plan on excavating all of this dirt while not damaging the resources in the ground? If anything is found, who will the artifacts be given to? What will be the chain of custody for anything found? Will the project construction be stopped until the affected area is thoroughly examined by archeologists? These details are essential to protecting the Beverly Fairfax Historic District.

Where will the dirt taken be disposed of and what research will be conducted to ensure that the dump site will not have any damage? I believe that it is important not only that the district's land will be okay but also that this does not raise environmental concerns for another area.

Response to Comment No. 285-2

Refer to Response to Comment No. 13-7 regarding the analysis of archaeological resources within the Project Site, and the process by which archaeological discoveries are evaluated and treated through implementation of Mitigation Measure CUL-MM-1. As specified in Section IV.B, Cultural Resources, of the Draft EIR, Mitigation Measure CUL-MM-1 requires that a Qualified Archaeologist be retained to prepare and implement a CRMTP using the SOI's Standards for Archaeological Documentation as a framework. These procedures provide an overall framework to ensure that any resources identified during excavation or other ground disturbing activities for the Project adhere to existing regulations and follow professional archaeological standards. Practical considerations prohibit defining specific details of the CRMTP and WEAP, but the steps to be followed in the event of a discovery and the collection and disposition of any collected materials are both standard elements of these procedures. The careful and controlled excavation of archaeological or paleontological materials may be conducted as part of this process, as described above in the Response to Comment No. 13-7. The Supplemental Cultural Memo, included as Appendix FEIR-14 of this Final EIR, provides additional detail and expert opinion addressing the methods used to assess the potential for buried resources and how the provisions of Mitigation Measure CUL-MM-1 provide a reasonable and feasible means of mitigating potentially significant impacts to archaeological resources that may be encountered, including those resources assessed as having the greatest likelihood of being present. Mitigation Measure CUL-MM-1 has been refined to further define performance criteria and enhance the ability of the Qualified Archaeologist and archaeological monitor(s) to identify, evaluate, and appropriately treat any archaeological resources identified during ground disturbing activities; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The transfer of any collected materials and several of the procedures that must be conducted to meet curation standards, including the identification of an appropriate curation facility, and maintaining a chain of custody during transfer of any materials, are all standard elements identified in a CRMTP. Thus, where any given artifact identified during the Project is retained would vary based on several factors that are defined in the CRMTP, but would ultimately be determined only once a discovery is made and through consultation with the appropriate parties. The parties who may ultimately retain all or part of an artifact collection and be consulted during the determination process include but are not limited to local Native American tribes, the Applicant, a curational facility, an individual or group with cultural or historical affiliations, and a public or private institution for educational purposes.

The sediments that compose the Project Site are not of the proper age to contain dinosaurs, but a paleontological assessment was completed for the Project and analyzes whether there is evidence of various prehistoric plants and animals preserved as fossils. The Paleontological Resources Review Memorandum provided in Appendix F of the Draft

EIR includes mitigation measures that would ensure that any paleontological resources that may be present would be adequately identified and treated in accordance following professional standards.

Regarding the sediments exported off-site, refer to Response to Comment No. 323-3.

Comment No. 285-3

On a more logistical note, what time of day will the excavation take place? And how many days per week? If the plan is agreed on, I will need to be waking up earlier in anticipation of the traffic so I am concerned that I could be spending a long time waking up to the digging.

Response to Comment No. 285-3

Refer to Response to Comment No. 73-2 regarding construction hours and the proposed CTMP.

Comment No. 285-4

For years, tar preserved the bones of trapped animals at La Brea Tar Pit yet the developers are not considering that this excavation could unveil the bones of ancient animals. How far will the excavation site be from this landmark? If the developers plan on using massive excavators, how long are they planning on spending on excavation while looking for resources? These excavators can carry 19 to 24 tons—spotting an ancient bone would be like finding a needle in a haystack.

Response to Comment No. 285-4

Section IV.D, Geology and Soils, of the Draft EIR included an analysis of the Project's potential to impact paleontological resources. Refer to Response to Comment No. 35-90 for a detailed summary of the analysis contained in the Draft EIR. As discussed on pages IV.D-15 and IV.D-16 of the Draft EIR, the Project Site is approximately 4,000 feet to the north of the Hancock Park and the La Brea Tar Pits.

Based on the analysis contained in the Draft EIR, the Project would implement Mitigation Measure GEO-MM-1, which requires that a paleontologist be retained to prepare a Paleontological Resource Mitigation and Treatment Plan for the Project. Refer to Response to Comment No. 35-91 for a discussion of Mitigation Measure GEO-MM-1. As provided in that measure (and as discussed in Response to Comment No. 35-91), a WEAP

is provided to the construction workers to educate and sensitize them to the potential presence of paleontological resources at the Project Site.

In addition to the paleontological monitor(s) on-site, construction crew members such as the operator of the excavator, the geotechnical consultant, and the grade depth checker may detect paleontological resources in the excavation area. Those construction crew members and the paleontological monitor will coordinate throughout the excavation of the native soil below the artificial fill at the Project Site. For example, the paleontological monitor will use different techniques to locate any paleontological resources, such as using hand signals to convey to the heavy equipment operator that they need to access the excavated area to look for fossils or depositional environments conducive to fossil preservation. As deeper depths are reached, exposed walls within native sedimentary deposits offer the monitor an exposure to view potential sedimentary layers, or strata, for paleontological resources. If there is a discovery, the potentially significant paleontological resource can be moved to the side for evaluation or if the resource cannot be moved, the monitor will direct the operator of the construction equipment work to temporarily work in another area so that the resources can be safely recovered.

Thus, if a potential resource is detected, the paleontological monitor has the authority to divert and/or re-direct ground-disturbing activities in the area of the find, and rope off a protective barrier of at least 50 feet to evaluate the unanticipated find. As provided in the revised Mitigation Measure GEO-MM-1, "If significantly disturbed deposits or younger deposits too recent to contain paleontological resources are encountered during construction, the Qualified Professional Paleontologist may reduce or curtail monitoring in those affected areas, after consultation with the Applicant and the Los Angeles Department of City Planning's Office of Historic Resources." Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 285-5

Until my concerns about Beverly Fairfax's historic and cultural resources are addressed, I will urge my neighbors to stand up against the project.

Response to Comment No. 285-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 285-2 through 285-4.

Comment Letter No. 286

London Kim
242 S. Detroit St.
Los Angeles, CA 90036-3034

Comment No. 286-1

The DEIR for this new studio coming into my neighborhood appears to be incomplete, since it is lacking very crucial information regarding trip generation. Why wasn't site-specific data included in this DEIR? How could impacts be analyzed accurately without using site-specific data? This project could have a huge impact to the community, and a project of this scale should have the ability to have its own studies and not piggyback off other studies that may or may not be closely related to this site.

Response to Comment No. 286-1

The Project does not represent a "new studio" development, but rather a continuation and expansion of an existing studio complex that has been on this site for more than 70 years.

Refer to Topical Response No. 10, Trip Generation, for a discussion on the validity of the empirical data used to estimate trip generation for sound stage, production support and production office uses at the Project Site, including a comparison of actual driveway counts of existing trips at the Project Site to estimates using those trip rates. It also includes a detailed discussion of trip generation for studio audience members.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project in accordance with CEQA.

Refer to Response to Comment Nos. 5-8 and 11-3 regarding the size of the Project and compatibility of the Project with surrounding uses.

Comment No. 286-2

Will any decision on this project be made before the community has more information about how this will specifically affect the people who live and work here? Don't let this studio skate by on just generalities.

Response to Comment No. 286-2

As demonstrated in Response to Comment Nos. 286-3 and 286-4, below, the Draft EIR was prepared in accordance with the requirements of CEQA. Following publication of the Final EIR, the Project will be subject to public hearings and meetings, City Planning Commission review, and ultimately review by the City Council.

Comment No. 286-3

I can understand why the DEIR would say that the trip generation for certain land uses is based on studies of other studio's trip generation. It appears as though the ITE trip general manual doesn't have data for studio-related uses (which appears to be something to look into!). However, saying it was just based on these things and not specifying what they actually are is a big problem. Saying these studies are empirical studies without actually providing those numbers doesn't provide a sense of trust and transparency, in fact it does the exact opposite. What were these studies? What kind of studios did they base them on? Were they bigger or smaller studios? Do these studios have the same conditions as this studio? I can't imagine man [sic] studios are located around residential areas, but do these studies show otherwise?

Response to Comment No. 286-3

As explained in Topical Response No. 10, Trip Generation, the trip generation for the Project Site was based on a combination of sources, using and prioritizing empirical data from local studio and entertainment campuses as much as possible. The strongest base data available was an extensive set of studio trip generation traffic counts conducted over multiple days of the week and times of the year at Universal Studios. This data set was so detailed that it allowed the various elements of the studio complex to be separated and trip rates for each type of studio-related land use to be separately identified—sound stages, production support areas, and both production offices and general offices. These trip rates were confirmed in detailed studies of Paramount Picture Studios and Sony Studios. All three of these studio complexes are adjacent to residential uses. All the studios cited are comparable studios to the Project and are located within Los Angeles or neighboring cities.

Comment No. 286-4

Additionally, there is talk of adjustments being used to calculate these estimates for trip generation. More shadiness! Where is the data supporting these kinds of adjustments? Is there any sort of basis for these adjustments to be made?

Response to Comment No. 286-4

Table 6 on page 81 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the trip rates used for each land use component in the Project Description—sound stage, production support, production office, general office, and retail. The only adjustments made to these empirical-based rates were adjustments to reflect the estimated percentage of transit/bike/walk-in modes in accordance with the TAG and CEQA.

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

Comment No. 286-5

It seems to me that there are still a LOT of questions to be answered, and this DEIR is just not enough to have the public feel comfortable.

Response to Comment No. 286-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 286-1 through 286-4.

Comment Letter No. 287

Noah Kistler
112 N.
Los Angeles, CA 90048

Comment No. 287-1

This project is not well-defined and doesn't even address the major long-term impacts to our community.

Response to Comment No. 287-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. As discussed in Response to Comment No. 9-24, the long-term buildout impacts of the Project were fully analyzed in the Draft EIR.

Comment No. 287-2

Obviously, it will result in a [sic] further development in the area. The Draft EIR needs to analyze the likely intensification of further development in the surrounding area as a result of this major change to the community plan.

Response to Comment No. 287-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation and the CEQA analysis of the proposed General Plan Amendment. Refer to Response to Comment No. 26-177 regarding the Project's growth-inducing impacts.

Comment No. 287-3

I'm also concerned about is the proposed "Mobility Hub." What is that? Will the general public be allowed to use it? Did the EIR study all of the traffic, noise and air pollution from the buses, shuttles and ride share cars going to and from this Mobility Hub? Will there be a police kiosk or other police presence at the mobility hub? People are not going to ride transit unless they feel safe and secure.

Where are those analyses? Are there any rules that will control the operations? Will the City oversee the usage long-term?

I don't want a bus depot in my neighborhood: this is supposed to be a studio—not a bus depot, that is a magnet for transient people and crime.

Response to Comment No. 287-3

With regard to the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. The Mobility Hub is accounted for in the analyses of transportation, noise, and air quality within Sections IV.K, Transportation, IV.I, Noise, and IV.A, Air Quality, of the Draft EIR, respectively; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As demonstrated therein, impacts associated with the Mobility Hub were accounted for in the analysis and there would be no new significant impacts as to those impact areas. Thus, there would be no change to the impact conclusions in the Draft EIR. Refer to Response to Comment No. 219-1 above regarding why the assertion that the Mobility Hub is a bus depot is incorrect. Also refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 287-4

There needs to be more information, analysis and rules around this whole mobility hub proposal.

Response to Comment No. 287-4

Refer to Topical Response No. 7, Mobility Hub, regarding the proposed Mobility Hub, which was described in Section II, Project Description, and Section IV.K, Transportation, of the Draft EIR. This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 287-1 through 287-3.

Comment Letter No. 288

Elijah Klapper
539 N. Formosa Ave.
Los Angeles, CA 90036-1944

Comment No. 288-1

The Television City proposed development should not be allowed. The intent is clear: it is a money-making endeavor for the developer and will not solve any problems in LA. It will simply create more problems.

Response to Comment No. 288-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 288-2

Where is the housing for all the additional employees, visitors and workers that are expected to be at Television City every day? How can the developer propose all of the new facilities and office space but not have to also address the housing that will be needed for all those people? The development looks to add a ton of office space. Exactly how many offices are going to be built? Will they all be occupied? What kinds of work will be done in those offices? What this community needs is more workforce housing. We need more people to continue to be able to work from home, not having to drive in their cars to get to offices. We already know that this worked well when so many had to work from home during covid. So why a developer would plan for more work spaces and not more homes?

Response to Comment No. 288-2

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

As discussed in Section II, Project Description, of the Draft EIR, the Project proposes the development of 635,400 square feet of production office space and 594,070 square feet of general office space, with a total of 700,000 square feet of production office space and 700,000 square feet of general office space permitted under the Specific Plan. Refer to Table II-2 on page II-13 of the Draft EIR.

The comment regarding workforce housing is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment Letter No. 289

Michael Klausman
1855 Kanola Rd.
La Habra Heights, CA 90631-8218

Comment No. 289-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 289-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 290

Jeff Kloehn
347 N. Ogden Dr.
Los Angeles, CA 90036-2142

Comment No. 290-1

I have lived in the area for 24 years. I'm writing to comment on TVC 2050 after my review of the Draft EIR.

Response to Comment No. 290-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 290-2

I have many critiques, my concerns are issues with the Grove Drive parking, and the project information requirements by the State of California in the Draft EIR process. Also, What will happen to the walkability, traffic and lack of parking. Will this really end up being a 20 year emission buildout for our community?

Response to Comment No. 290-2

Regarding walkability, refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding parking, under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

The preferred construction program would see the Project completed in one phase so that the construction would be completed in the 32-month time frame evaluated in the Draft EIR. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 290-3

Please see more information on my research and project concerns below.

According to the Draft EIR, a large parking structure is being planned. Is that parking structure where all of the new 5,300 parking places will be housed? Why hasn't the developer considered spreading the parking around the project property instead? Because the traffic trying to get in and out of the parking structure is going to get extremely backed up.

Where is the analysis that shows the expected times for all those drivers to be able to get in and out of the structure and shows the impact on the entering and cross streets? Having the entry point of that structure on Grove seems poorly thought out and illogical. How and why was it decided to do that? What is the developer going to do about all that traffic and the back up of cars, which already happens now all day long?

That street borders a park frequented by families and children. Congestion from parking accessed on a small street next to a popular park filled with families has disaster written all over it.

Response to Comment No. 290-3

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-169 and 26-E.4-17 regarding access and use of The Grove Drive.

The effects of Project vehicles entering and exiting the Project Site is included in the non-CEQA operational analysis which is summarized in Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR). The results show that the three signalized intersections providing access to the Project Site would all operate at LOS B after full buildout of the Project. Refer also to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion.

Comment No. 290-4

How tall are the structures going to be in this project? How many tall buildings will there be? How is this going to impact Pan Pacific Park? How will any tall structures affect the views that nearby residents have now? The height zones in the land use plan are larger than what is presented in the conceptual plan. What are we going to have in this project? Why are those figures different? What is in it for the community?

I would like to see these issues addressed.

Response to Comment No. 290-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, the Conceptual Site Plan that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan. As discussed therein, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, CPC-2021-4089-AD-GPA-ZC-SN-SP. As discussed throughout the Draft EIR, the Project includes height zone, stepback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, stepbacks, and frontage areas associated with the Project. See also Response to Comment Nos. 11-3 and 26-7 regarding the height of the Project, including with respect to surrounding uses. In accordance with CEQA, Section IV.H, Land Use and Planning, of the Draft EIR analyzed the Project's consistency with applicable plans, policies, and regulations that regulate land use on the Project Site, including the LAMC, among others, as well as the compatibility of the proposed uses with surrounding land uses, including nearby residential uses and Pan Pacific Park, and concluded that impacts would be less than significant.

This comment also raises questions related to aesthetic impacts (views). As described in Section 4.I on pages 30–31 in the Initial Study, provided in Appendix A of the Draft EIR, the Project is an employment center project located on an infill site within 0.5 mile of an existing major transit stop pursuant to SB 743 (Public Resources Code Section 21099). As such, as discussed in ZI File No. 2542, “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact,” unless evaluation is required under other land use regulations in the LAMC. An evaluation of aesthetic impacts is not required under the LAMC. As such, no further analysis was

required in the Draft EIR for this topic. However, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 291

Gabrielle Knable
435 N. Croft Ave.
Los Angeles, CA 90048-2508

Comment No. 291-1

From what I can see, the project proposes 14 performance stages, which will attract thousands of cars to the site (audience members, performers, staff people, etc), [sic] presumably all day and into the night.

What will this mean for our community? Where are these people going to park? I doubt that anyone would want tons of police presence in our neighborhood, but what kind of security will be put in place to handle all this influx? Will the street lighting be upgraded so that there aren't inviting targets for car break-ins and robberies? What about the noise level in our neighborhood? Will there be loud concerts every night? Massive lights and/or fireworks?

Response to Comment No. 291-1

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nonetheless, with regard to parking, as discussed on page II-30 of Section II, Project Description, of the Draft EIR, the Project would provide a sitewide total of approximately 5,300 parking spaces based on parking ratios set forth in the Specific Plan. Vehicles may be parked in tandem (double or triple) or by valet, depending on the specific parking layout. In addition, the Specific Plan would set forth a process for the approval and implementation of a reduced/shared parking plan, so long as an adequate parking supply is maintained. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the parking supply to accommodate the peak parking demands of the Project. Off-site parking is not needed to meet the Project's peak parking demands and has been removed from the Project Description; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Traffic safety in the neighborhoods is a critical focus of the NTMP process described in Topical Response No. 9, Neighborhood Traffic Management Plan. The NTMP included as part of the Projects Transportation Improvement Program (see Topical Response No. 15, Transportation Improvement Program) would result in the affected neighbors working with the Applicant and LADOT to develop a plan to monitor and respond to cut-through traffic along the neighborhood streets in the affected neighborhoods. Traffic noise was included in the operational noise analysis provided in Section IV.I, Noise, of the Draft EIR.

Refer to pages IV.I-48 through IV.I-54 therein. As demonstrated therein, impacts with respect to traffic noise would be less than significant.

The Project Site would not include a multi-screen cinema or a concert venue that will attract traffic and parking demand from the public.

In regard to police presence, please refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment Nos. 16-5 and 35-133 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

With respect to the environmental impact of lighting, pursuant to Public Resources Code Section 21099, because the Project is an employment center project located on an infill site, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 38–40 of the Initial Study for a discussion of lighting.

In regard to street lighting, as part of the Project, street lighting would comply with applicable regulatory requirements. In addition, in accordance with LAMC requirements, on-site lighting would be shielded and directed away from off-site uses.

In regard to noise, refer to pages IV.I-48 through IV.I-54 of Section IV.I, Noise, of the Draft EIR regarding the Project's less than significant operational noise impacts. There would not be loud concerts every night, large lights or fireworks. A concert venue and fireworks are not permitted uses; refer to Topical Response No. 3, Permitted On-Site Uses.

Comment No. 291-2

This project will really impact our community and I don't see any benefit at all.

Response to Comment No. 291-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 291-1.

Comment Letter No. 292

Sascha Knopf
459 1/2 N. Gardener St.
Los Angeles, CA 90036-5708

Comment No. 292-1

As a 19 year resident of the Fairfax neighborhood, Television City 2050 seems like an unbelievably ambitious project that will for sure overwhelm our neighborhood. I am concerned with multiple aspects of the EIR. Information is missing, confusing, and conflicting.

Response to Comment No. 292-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Draft EIR was prepared in accordance with the requirements of CEQA. Specific issues raised by the commenter are addressed in Response to Comment Nos. 292-2 through 292-5.

Comment No. 292-2

One area of concern is with the water use. The EIR says this project will increase water use by 500%. This amount is staggering. What accounts for that extent of increase? How could that be acceptable in the midst of a statewide drought? I understand that the facility will be bigger, but such a huge increase is dramatic and seems like it should be included as a major impact analyzed in the EIR. What amount of increase would make it officially significant enough to include in the EIR? How is 500% not enough to meet this mark?

Response to Comment No. 292-2

With regard to water demand, as discussed on page IV.M.1-29 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, in accordance with Appendix G of the CEQA Guidelines, the Project would have a less than significant impact related to water supply and infrastructure if it would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. As discussed in Response to Comment No. 26-175, LADWP and the Draft EIR correctly concluded that LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, and, therefore, impacts on water supply would be less than significant. Refer to Response to Comment Nos. 16-66 and 26-175 with regard to the adequacy of water supply to serve the Project.

Comment No. 292-3

Another fear is that the city is being bullied by the developer. For what other reason would it be the developer's financial benefit be included as an objective? I read that a project objective was for the developer to make money. Why is this a part of the environmental impact report? What does that have to do with the city, its citizens, or the environment? What connection does the developer have that made this possible? The desires of a politically powerful developer who wants to grow Television City seem like a sketchy matter to include in a government document for the public's information.

Response to Comment No. 292-3

Please note that the Draft and Final EIR were prepared by the Los Angeles Department of City Planning as Lead Agency in accordance with CEQA and City policies. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment also raises non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 292-4

Why does the plan for development not include housing? We in LA need more housing, particularly affordable housing for workers. If the project could include this kind of residential use, it would be more palatable for the neighbors. It would reduce traffic because people could live and work in the same neighborhood. Why was this important need not addressed in the EIR? How can housing not be considered in a development of this size, especially when there is no available housing for the large number of employees?

Response to Comment No. 292-4

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Vehicle trips anticipated to be generated by the Project and the associated impacts on the transportation system are addressed in Section IV.K, Transportation, of the Draft EIR. As discussed in Section IV.K of the Draft EIR, Project impacts related to transportation would be less than significant, and no mitigation measures would be required.

Comment No. 292-5

I am frustrated by the onerous traffic section of the EIR, all 83 pages of it plus the appendix. Why couldn't the EIR be clear and concise, explaining the effects of this project on the neighborhood in language that the public could understand? I have some specifics I want to refute. For one, there is the wildly optimistic number of vehicle miles travelled listed as the average for workers at the site. As I understand the EIR, it states people drive 6.7 miles per day to get to and from the site. Is this a correct interpretation? And, if so, how is that number reasonable? Were there assumptions made about the employees, both now and in the future when the project is complete? What kind of information was used to obtain this number? How could it be that employees live so close on average? My experience is that the people who work in this area live all over LA, as well as Orange County, Santa Clarita, the San Fernando Valley, and other locations much farther than 3.35 miles one way.

Response to Comment No. 292-5

This comment is similar to Comment No. 47-7. Refer to Response to Comment No. 47-7.

Regarding the length of the EIR, the Department of City Planning has complied with CEQA in providing the public with the relevant information necessary to be informed on the potential environmental impacts of the Project. This information can often be voluminous but is, nonetheless, provided for the purposes of public disclosure.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 292-6

Thank you for your attention to my concerns.

Response to Comment No. 292-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 293

Jacob Koo
118 S. Kilkea Dr.
Los Angeles, CA 90048-3526

Comment No. 293-1

I am asking you to please save my neighborhood. The Television City 2050 plan is going to seriously harm the Beverly/Fairfax neighborhood and the lives of those of us who live here. Aside from the fact that none of us knows much about what the project really is, the EIR does not give any indication as to what the project will actually do to our neighborhood and I am very concerned about that.

I have a lot of concerns about the negative impacts that will come with such a huge planning project. Why do we need to develop such a massive project here in the Beverly/Fairfax neighborhood?

Response to Comment No. 293-1

The Project Description meets the requirements of CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description. The Draft EIR was prepared in accordance with the requirements of CEQA. The remainder of this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project

Comment No. 293-2

This is not an area that can handle all the horrendous additional traffic that will be caused by construction and then by when the project is completed. What traffic will be pouring into our neighborhood? How much additional car traffic is expected? During what phases of construction?

And what about once the project building phases are done—what will the traffic be given all the things they're proposing to use the property for? It should be required to show what traffic is expected due to offices being built, what traffic is expected due to all those new stages? What traffic is expected with the mobility hub the report references? Will there be thousands of additional cars daily? Coming from which directions? Will there be cars that come and park all day, or will there be traffic throughout the day from visitors?

I get that there will be all kinds of construction traffic. What part of the expected additional traffic will be a result of the trucks and equipment? Where is the breakdown of the sources, times, and expected impacts of the different kinds of traffic that our neighborhood is going to have to deal with?

Response to Comment No. 293-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, 124-6 and 162-2 regarding construction trips.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips. The direction of travel for the Project automobile and truck trips is shown in Figure 21 on page 77 of the Transportation Assessment which details the amount of Project vehicles through each of the 31 study intersections.

During operation, approximately 83 trucks per day are anticipated. The tables attached to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, show that the Project is expected to generate approximately 65 light trucks (single unit) per day and approximately 18 heavy trucks (semi-trucks) per day for a total of approximately 83 trucks per day entering the Project Site. Refer to Topical Response No. 10, Trip Generation, regarding the truck and automobile trip generation estimates during Project operation.

Traffic safety in the neighborhoods is a critical focus of the NTMP process described in Topical Response No. 9, Neighborhood Traffic Management Plan. The affected neighbors would work with the Applicant and with LADOT to develop a plan to minimize cut-through trips along the neighborhood streets in the affected neighborhood areas. Refer to Topical Response No. 9 regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment.

Comment No. 293-3

What are going to be the air quality impacts of thousands of vehicles on the road because of this project? Where have those impacts been studied? If any traffic and air quality impacts were studied during the pandemic, then those studies need to be done again now

that more people are out, more people have returned to their offices. When will updated studies be done? How will the neighborhood find out about any updated studies?

Response to Comment No. 293-3

The Project's air quality impacts, including impacts from vehicles, are analyzed as required by CEQA in Section IV.A, Air Quality, of the Draft EIR.

As stated on page IV.K-24 in Section IV.K, Transportation, of the Draft EIR, Project vehicle counts used for impact analyses were based on 2019 (i.e., pre-pandemic) traffic counts for all intersections, except for the intersection of Fairfax Avenue and West 1st Street, which were based on the latest available 2017 data. The pre-pandemic traffic levels were factored to represent current traffic levels assuming typical growth patterns in non-pandemic times. Since Los Angeles experienced almost two years of little or no traffic growth, the traffic volumes forecast for year 2026 conditions in the Transportation Assessment represent conservative (i.e., high) estimates of future traffic levels and, therefore, are considered valid. Thus, no revisions to the Draft EIR analyses due to the transportation effects of the pandemic are necessary.

Comment No. 293-4

Please let's slow down and rework things before moving forward with a potential detrimental development in the Beverly/Fairfax neighborhood.

Response to Comment No. 293-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 294

Robin Kopf
313 N. Stanley Ave.
Los Angeles, CA 90036-2328

Comment No. 294-1

I'm writing on behalf of my family and my neighbors that reside in the Beverly Fairfax area. We are extremely concerned about the TVC 2050 project, proposed to be in our backyard. We are troubled by the recent EIR that "details" this project and would like some clarity on a few things:

Response to Comment No. 294-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 294-2.

Comment No. 294-2

The EIR notes project design features are extremely confusing. What are all these design features? The EIR also doesn't note if they will be a part of the project or not, so will they be or not? It seems like an overarching theme in this EIR document is its vagueness. Please fill the community in about these design features on the TVC 2050 project. Do they also include any mitigation measures? How is it determined if mitigation measures will even make a difference? Impacts will still be experienced, even with mitigation.

In addition to the vagueness on these design features and its mitigation measures, we're also concerned about the enforcement of this entire project. How are the project design features going to be enforced? How will the entire EIR be enforced? It's concerning that it does not detail this in the document itself. It's important to understand the project with and without these design features, although they are vague. How was the project analyzed with these design features? How did the EIR analyze the project without these design features? It should be worth noting depending on the questions about how these changes with enforcement and mitigation measures.

Furthermore, is the EIR assuming the implementation of these design features? It's awfully confusing that the EIR analysis doesn't include it without those design features, that again, are incredibly vague. What is the impact of the analysis if it assumes these project design

features? These seem to be mitigation measures that should be imposed after the analysis is done.

Response to Comment No. 294-2

Refer to Response to Comment No. 9-34 for a detailed discussion of the roles of PDFs and mitigation measures, the proposed PDFs and how enforcement would be ensured by their inclusion in the Mitigation Monitoring Program. Enforcement of the EIR's PDFs and mitigation measures would be ensured through the City Council's adoption of the Mitigation Monitoring Program for the Project, which the City Council would be required to approve as part of the City Council's certification of the Project's EIR. Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." Therefore, if the Project is approved, there will be a detailed plan in place to ensure monitoring and enforcement of all of the EIR's PDFs and mitigation measures. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR.

Section IV of the Draft EIR includes a thorough analysis of impacts during both construction and operation, as well as any required mitigation measures, and the level of significance after mitigation.

Comment No. 294-3

Again, our community is incredibly concerned with this project and the EIR. I hope you all can help us understand some of these concerns we have. Please help us stop the development, enough is enough.

Response to Comment No. 294-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 295

Sharon Korr
160 S. Vista Dr.
Los Angeles, CA 90036-2708

Comment No. 295-1

The citizens of the Beverly Fairfax community are not interested in a gigantic new Television City towering over our homes. In looking at the EIR, I feel there is some important information the public deserves to know that was not included.

Response to Comment No. 295-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 295-2

I am interested in the traffic problems that will result from this long construction project, all of the people who will be commuting long distances, and the resulting expansion of the facility.

Response to Comment No. 295-2

A complete analysis of construction vehicle impacts was included in the Transportation Assessment included as Appendix M.1 of the Draft EIR. Refer to Section 5D, pages 179–184 therein. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the impacts of construction trucks and construction worker vehicles on the traffic conditions along the roadways serving the Project Site. As discussed therein, Project trip generation during construction would be less than the Project when fully operational and, thus, would have a lesser effect on traffic than the Project as analyzed in the Transportation Assessment and Draft EIR. Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. That topical response includes additional details and an example regarding how work VMT per employee is calculated in the VMT analysis.

Comment No. 295-3

The traffic portion of the EIR leaves much to be desired. I am overwhelmed by its 83 pages and the seeming lack of accurate analyses in there. For example, how were the

vehicle miles travelled observed and calculated? As I understand, it is estimated the average worker at the site will drive 3.35 miles each way to work. Employees in LA, in many sectors often do not live that close to their workplace. As I consider their commutes, they are much longer than 3.35 miles to and from work, as many as 40–60 miles. Did the EIR analysis take place during the pandemic and average in the miles not travelled due to work-at-home policies? Were the current employees surveyed about their commutes? It seems highly unlikely that the 3.35 miles is correct.

Response to Comment No. 295-3

The reference to a 3.35-mile one-way commute is a misinterpretation of the VMT analysis in the Draft EIR. The calculation comes from incorrectly assuming that the work VMT per employee of 6.7 means that each employees drives 3.35 miles to work and then 3.35 miles to return home at night. The work VMT per employee represents a one-way trip from home to work, not a round trip as cited in the comment. In addition, the work VMT per employee is more than a calculation of home-to-work travel distance. It also factors in the number of employees that use non-auto modes to travel to/from work. So, the basis for the math in the comment is incorrect and results in a number that is not comparable to the metric of work VMT per employee.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, for a detailed description of how the work VMT per employee is calculated and how the metric is used to measure the VMT of a project.

Comment No. 295-4

The business model of the developer also seems to be a part of the EIR, which seems unnecessary. Why should the city include one of the objectives of the project being the developer's financial gain? What connection does the developer have to the city that this is appropriate? That seems like a nefarious possibility. Is the purpose of the EIR not to protect the residents and quality of life in LA? We deserve to know what is going on behind closed doors.

Response to Comment No. 295-4

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project.

Comment No. 295-5

My neighbors and I do not appreciate being misled with an EIR that is confusing and indirect. Too many unnecessary words that ironically, leave a lot of information out. The

developer needs to provide better, more accurate information, and the city needs to only accept realistic and appropriate analyses of the impacts to our lives and city.

Thank you for your consideration.

Response to Comment No. 295-5

The Draft EIR was prepared in accordance with the requirements of CEQA and includes a thorough analysis of the Project's potential impacts during both construction and operation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 296

Rick Kosick
164 S. Hayworth Ave., Apt. 07
Los Angeles, CA 90048-3613

Comment No. 296-1

I'm very concerned about traffic, 20 years of construction, constant trucks in and out of the area, and where people will park.

Response to Comment No. 296-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and haul routes.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nonetheless, refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 296-2

I'm also thinking about noise levels—making movies and television shows can be very loud and can happen anywhere onsite at all hours. And I understand that there will be 14 stages on the property—because there is no set plan of development, noisy activities can happen anywhere.

How do we know that the EIR correctly calculated noise impacts? The EIR didn't assume loudest activities at property lines. It should have done so, and this analysis needs to be provided

Response to Comment No. 296-2

The issues discussed in this comment are similar to those in Comment No. 147-3. Refer to Response to Comment No. 147-3, above.

Comment Letter No. 297

Shepard Koster
148 S. Hayworth Ave., Apt. 4
Los Angeles, CA 90048-3617

Comment No. 297-1

My concerns are about TRAFFIC and QUALITY OF LIFE in our neighborhood. Thousands of cars will be clogging our streets. And where are all the people going to park? The EIR says more than 5,000 parking spaces are needed, but then says that the parking spaces may be offsite—sounds like their plan is for thousands of cars to park in our neighborhood. If the parking is offsite, what are the air quality impacts, noise impacts, safety issues from people speeding in the community, pedestrian impacts, and other impacts of off-site parking?

These impacts on our quality of life need to be analyzed.

Response to Comment No. 297-1

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nonetheless, refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

With regard to traffic, refer to Response to Comment No. 47-3.

Please note that quality of life is not an environmental impact under CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 298

Douglas Kriete
908 S. Genesse [sic] Ave., #7
Los Angeles, CA 90036

Comment No. 298-1

As a resident of the area for 26 years, I am extremely concerned with the intentions behind the Television City project. I can completely understand the importance of adding new jobs and cultivating growth in the area. But does LA really have this much more room to grow?

Response to Comment No. 298-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 298-2 through 298-8.

Comment No. 298-2

Please consider the congestion that we as residents deal with on a daily basis. Now, imagine it with 8,000+ people. Think of the traffic, the parking, the congestion, and the noise that will consume and overwhelm the area.

Response to Comment No. 298-2

This comment is identical to Comment No. 133-2. Please see Response to Comment No. 133-2, above.

Comment No. 298-3

I'm not even fully convinced of the city's intentions with this project after trying to read through the EIR. It seems to me that that the developer's return on investment is a project objective. Why would this be the case? Please provide and circulate to the public the developer's proforma. Since the developer has included it as an objective, the financial information must be made available. If the city is prioritizing the developer's profitability, there must be something in return for the city. What is it?

Why would this be a project objective when there are countless other critical needs and people with great needs to consider? The City should care about the health and welfare of its residents.

Response to Comment No. 298-3

This comment is identical to Comment No. 133-3. Refer to Response to Comment No. 133-3, above.

Comment No. 298-4

There are countless neighborhoods and families that will be directly affected by this project. By LA law, there will have to be 1.3 million homes built by 2029 to comply with the city's housing quota. There already is not nearly a sufficient number of homes and rentals in the area. The project adds to that needs thousands more people. Where will they go?

Response to Comment No. 298-4

This comment is identical to Comment No. 133-4. Refer to Response to Comment No. 133-4, above.

Comment No. 298-5

There is a methane issue to consider, countless environmental factors and tons of safety hazards that will accompany this project.

Response to Comment No. 298-5

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane.

Comment No. 298-6

Along with the safety and legal problems, there also is the issue of over advertising the area with potentially many large and bright lit billboards.

Response to Comment No. 298-6

Refer to Response to Comment Nos. 5-10 and 26-21 regarding proposed signage, including how billboards would not be permitted and how the Project signage would comply with the illumination requirements specified in the LAMC.

Comment No. 298-7

I imagine an entertainment studio will also bring loud music and hollering at all times.

Response to Comment No. 298-7

This comment does not indicate specific issues with the noise analysis. Nevertheless, Section IV.I, Noise, of the Draft EIR fully analyzed potential noise impacts associated with the Project related on-site noise sources, including outdoor uses (people talking and amplified sound) and outdoor studio production activities. Refer to pages IV.I-44 through IV.I-46 in Section IV.I, Noise, of the Draft EIR.

Comment No. 298-8

From what I understand, parking will interfere with the farmers market and could likely take away business.

Response to Comment No. 298-8

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Project parking would not interfere with The Original Farmers Market. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 298-9

What sense does this make for the community? The EIR has to provide more of how this project is going to impact our neighborhoods. There simply is not enough detail and until we are given this, I do not believe the city's motives are in favor of the community.

Response to Comment No. 298-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 298-2 through 298-8.

Comment Letter No. 299

Tamara Krinsky
104 N. La Jolla Ave.
Los Angeles, CA 90048-3528

Comment No. 299-1

I live in the Beverly Fairfax district, and I would like to voice several concerns about the proposed TVC2050 plan.

Response to Comment No. 299-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 299-2 through 299-5.

Comment No. 299-2

- I am confused about what exactly the mobility hub is. Who is going to be allowed to use this? Is it for the neighborhood and general public? When will the hub be used, what hours of the day? Is it open all night? Once it is built, who will control the operations? How much traffic is expected will be created from this mobility hub? What kinds of traffic—cars, rideshare vehicles, buses? Has there been studies about the traffic that will be generated from cars, buses and ride shares going to this Hub?

Response to Comment No. 299-2

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips.

Comment No. 299-3

- I am also concerned about air pollution. Aside from air pollution that could be caused by the mobility hub, wouldn't there also be impacts from production trucks? Does the Air Quality analysis include the impacts of hundreds of production vehicles releasing diesel particles into our neighborhood? There are a lot of schools, nursing homes, and residents that will be impacted by these trucks. Have they been notified of the impacts these trucks will have? What steps are being taken to address air quality impacts of these activities? Are

those steps different for more sensitive groups like the elderly and young children? This information has not been made clear in the environmental report.

Response to Comment No. 299-3

Please refer to Response to Comment No. 26-E.1-16 regarding the number of Project-related operational trucks accessing the Project Site per day. As shown therein, the truck trips (approximately 31 total net new diesel trucks) are substantially less than the 100 trucks criteria cited in the Draft EIR that would trigger the need for a mobile air toxics HRA (see page IV.A-72 of the Draft EIR). Thus, the Draft EIR correctly concluded that Project-related TAC emission impacts during operations would be less than significant and consequently not result in a potential health risk impact.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. The HRA assesses all anticipated sources of DPM and other TACs which would occur on the Project Site during construction and operations. As shown therein, health risk impacts would be less than significant (including to the elderly and young children), confirming the conclusions of the Draft EIR.

Refer to Response to Comment No. 32-3 regarding the public noticing of the Project in accordance with CEQA.

Comment No. 299-4

- Third, I am concerned about noise levels. Studios can be very loud, and I did not see any defined plan of development. Did the environmental report assume the loudest activities would be in the middle of the project site or at the property lines? How far away will the different activities be heard? Where is that detail so the community knows what to expect if this thing is built? How do we know the report is accurate about noise impacts.

Response to Comment No. 299-4

Refer to pages IV.I-43 through IV.I-48 of Section IV.I, Noise, of the Draft EIR for an analysis of noise associated with operation of the Project including noise from outdoor production activities and potential impacts to nearby sensitive receptors. As demonstrated therein, noise impacts associated with operation of the Project would be less than significant. Refer to Response to Comment No. 26-135 regarding the conservative assumptions used in the noise analysis. Also refer to Response to Comment No. 26-146 regarding the analysis of outdoor production activities that was conducted for the Project. The noise analysis was completed in accordance with the City's requirements and CEQA.

Refer to Figure II-4 of Section II, Project Description, of the Draft EIR for the Conceptual Site Plan that was used as the basis for the noise analysis in the Draft EIR.

Comment No. 299-5

Additionally, I have concerns about the 18-wheeler trucks/turning radius, and how that will affect street traffic.

Response to Comment No. 299-5

Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering. Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding the truck trip generation estimates during Project operation.

Comment No. 299-6

Please address these concerns before moving forward.

Response to Comment No. 299-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 299-2 through 299-5.

Comment Letter No. 300

Ken Kristensen
426 Vista St.
Los Angeles, CA 90036-5741

Comment No. 300-1

I live in the Beverly Fairfax community who is very uncomfortable with the TVC2050 plan it stands. There are many things that I take issue with, but there is one in particular which I think needs to be reconsidered immediately. Currently, the plan is to have a large parking structure placed on Grove Drive. I have many concerns and questions regarding this aspect of the plan.

Response to Comment No. 300-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 300-2 through 300-4.

Comment No. 300-2

To start, Grove Street is a small street and it's right across from a park. From a logistical point of view, how do you plan on building such a large parking structure on such a small street? This doesn't make sense to me, and it must be made clear to residents like myself how this is actually going to work. What will happen when cars are backed up trying to enter (and exit) the parking structure? Where will those cars backlog traffic to? Why would a large parking structure be proposed for that particular location? This seems illogical, unsafe and irresponsible—that street is hard to navigate as it is. Where will cars go if there is no space left in that structure and they have to all then drive down Grove Street to find other places? What other parking is going to be available?

Response to Comment No. 300-2

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access and use of The Grove Drive. Refer to Response to Comment No. 83-1 regarding turn lanes. Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion Regarding how the Project driveways are designed to minimize queuing out onto public streets.

Comment No. 300-3

Beyond logistics, let's talk about safety. I know that my children, as well as many of their friends spend time in that park. Children, adults, senior citizens, and many families spend time in this park. Did the EIR consider the health risks associated with this parking plan? What about all the additional cars that will take that street, idle waiting to get into the parking structure, and then have those additional cars driving in and around the structure—all of which places more cars near the park?

Response to Comment No. 300-3

As discussed in Topical Response No. 13, Parking, the parking supply for the Project Site would be spread out across the Project Site. The queuing areas for The Grove Drive entrance are set back 160 feet into the interior of the Project Site in order to minimize backups and congestion that would affect The Grove Drive. The projected 95 percentile queue for the busiest peak hour at The Grove Drive entrance is 100 feet, so the storage length provided would be more than adequate to accommodate the anticipated storage demand. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding queuing and pedestrian safety. Refer to Response to Comment Nos. 26-E.1-15 and 127-4 regarding potential localized and health risk impacts associated with Project-related parking and trips. As discussed therein, the quantitative HRA confirms the Draft EIR's conclusion that health risk impacts would be less than significant.

Comment No. 300-4

The plan as it stands means that trucks will be going on Grove Drive during all the necessary construction and emitting diesel exhaust right next to the park. How is this going to affect the air quality of the people that go to the park to relax and get a breath of fresh air? How many trucks will be driving through Grove Drive each day? Exactly how close will the trucks be to the park when they are emitting diesel exhaust? What are the health effects of breathing air that is polluted with diesel exhaust? Are there any specific studies? Does it impact children differently than senior citizens? How? What about children and adults who have asthma and other medical and breathing issues?

Response to Comment No. 300-4

Please refer to Response to Comment No. 164-3 regarding construction-related truck activity and impacts. All haul truck staging would occur on-site per LADOT's

recommendation letter dated June 30, 2022 included as Appendix M.5 of the Draft EIR. Project haul routes for both loaded and empty construction trucks and hours/days of operation are also disclosed in LADOT's recommendation letter, available in Appendix M.5 of the Draft EIR. The Grove Drive is not included in the haul route. In addition, Project Design Feature TR-PDF-1 requires a detailed CTMP to be developed to manage the flow of construction vehicles and minimize impacts to the community as detailed on pages IV.K-36 through IV.K-37 in Section IV.K, Transportation, of the Draft EIR.

Please refer to page IV.A-10 of Section IV.A, Air Quality, of the Draft EIR for a discussion of diesel exhaust (DPM), which is a TAC that causes lung cancer in humans. As further discussed on page IV.A-24 of the Draft EIR, SCAQMD has released the MATES-V study that provides an estimated cancer risk from toxic air emissions including DPM throughout the Air Basin. In 2015, OEHHA updated the calculation procedure to estimate cancer risks from air toxics exposures. While not specific to DPM, the revisions to the calculation methodology included accounting for higher risks attributable to early life exposures (up to age 16 years) and updates to the population distribution of breathing rates by age would be applicable. The health risk impacts, including impacts related to Project-related emissions of diesel particulate matter from construction and operational trucks, are analyzed in the quantitative HRA, included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant (including to the elderly and young children), confirming the conclusions of the Draft EIR. Refer to Response to Comment Nos. 105-3 and 127-4 regarding the air quality impacts to Pan Pacific Park, if considered hypothetically as a sensitive receptor.

Comment No. 300-5

The logistics of the parking plan make no sense, but more importantly, this poses a potential health risk to our community. We are entitled to be able to spend time in the park with our friends and family without the concern of breathing in diesel exhaust. I would appreciate you responding to my questions above with enough detail to make me confident that this is not a direct health threat to my children who go to this park every day!

Response to Comment No. 300-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 300-2 through 300-4.

Comment Letter No. 301

Rachel Kushner
rachelkushner@gmail.com

Comment No. 301-1

I urge you to reject the current proposal for the “Regional Center.”

Response to Comment No. 301-1

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 301-2

The current proposal will be utterly disastrous for those of us who live in the neighborhood. 3 years of massive construction with lane closures and noise will hurt the community and the historic Farmers Market.

Response to Comment No. 301-2

As described in Topical Response No. 14, Construction Vehicle Impacts, no long-term closures on travel lanes on the public streets adjacent to the Project Site are anticipated. Construction parking and haul truck staging would be accommodated within the Project Site. As such, Project construction would not affect the operation of The Original Farmers Market.

While temporary lane closures may be necessary during construction, there would not be any long-term travel lane closures.

The noise analysis during both construction and operation of the Project has been completed in accordance with CEQA and is included in Section IV.I, Noise, of the Draft EIR.

Comment No. 301-3

The attraction of both visitors to the city and current residents to the Farmers Market and The Grove will decrease, which will have negative effects on the stores (and those employed) there.

Response to Comment No. 301-3

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 301-4

Even after the Regional Center is built, the city will have to contend with severe congestion and an increase in noise.

Response to Comment No. 301-4

Refer to Response to Comment Nos. 5-8, 11-29 and 16-4 regarding the proposed Regional Commercial land use designation.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The Draft EIR comprehensively analyzed the Project's potential noise impacts during operation and concluded that impacts would be less than significant; refer to pages IV.I-43 to IV.I-54 in Section IV.I, Noise, of the Draft EIR.

Comment No. 301-5

Do NOT approve the current proposal.

Response to Comment No. 301-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 301-1 through 301-4.

Comment Letter No. 302

Kelge Laau
433 S. Mansfield Ave.
Los Angeles, CA 90036-3515

Comment No. 302-1

This letter is in reference to the TVC 2050 project.

Response to Comment No. 302-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 302-2

In the land use and planning chapter, the developer states that an inconsistency between the proposed project and the applicable plan is a legal determination and not a physical determination on the impact of the environment. If there are inconsistencies between the community plan for the area and this proposed development, which legal experts will be making that determination and when? Do city attorneys evaluate inconsistencies?

Response to Comment No. 302-2

This comment is referring to the following language included on pages IV.H-16 to IV.H-17 in Section IV.H, Land Use and Planning, of the Draft EIR, which explains a conflict under CEQA:

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

An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. ... [I]f a project affects a river corridor, one standard for determining whether the

impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.

A comprehensive analysis of the Project's potential to conflict with all applicable plans is included on pages IV.H-39 to IV.H-56 of the Draft EIR. The Draft EIR concluded that the Project would not conflict with the goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with or impede the General Plan or Wilshire Community Plan, or the environmental policies in other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

The EIR was prepared by the Los Angeles Department of City Planning, as Lead Agency, and will be considered during several public hearings and meetings before City decision-makers, including the City Hearing Officer and Deputy Advisory Agency, the City Planning Commission, the Planning and Land Use Management Committee, and the City Council with input from the City Attorney's office.

Comment No. 302-3

Furthermore, the land use planning chapter also states that a proposed development does not have to be perfectly compatible with the general plan, but it has to adhere to the general plan intentions. Who determines whether a proposed project adheres to those intentions? Does the city Planning Department get involved with that? Are the intentions of the Wilshire Community plan also considered, or just the General Plan? How is it determined that intentions are adhered to? And what are intentions defined as? This seems like consistency and compatibility could be interpreted in different ways. How are these defined when evaluating a project? Where can people get that information?

Response to Comment No. 302-3

Refer to Response to Comment No. 302-2 above regarding land use conflicts. The analysis of potential land use impacts in Section IV.H, Land Use and Planning, of the Draft EIR considers the Project's potential to conflict with all applicable plans, policies, and regulations that regulate land use on the Project Site, as well as the compatibility of the proposed uses with the surrounding land uses, in accordance with Appendix G of the CEQA Guidelines and the L.A. CEQA Thresholds Guide. The methodology for analyzing consistency and compatibility is discussed on pages IV.H-16 to IV.H-17 of the Draft EIR. Regarding consistency, as stated on page IV.H-17 of the Draft EIR, under State Planning and Zoning Law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests,

and public agencies, such as the City of Los Angeles, are given great deference to determine consistency with their own plans. Per OPR's State of California General Plan Guidelines (2017), a proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall intent but need not be in perfect conformity with every plan policy. As stated on page IV.H-17 of the Draft EIR: "More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, State law does not require an exact match between a project and the applicable general plan. Rather, to be 'consistent,' the project must be 'compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,' meaning that a project must be in 'agreement or harmony' with the applicable land use plan to be consistent with that plan."¹⁵⁴ For this Project, the Draft EIR was prepared by the Los Angeles Department of City Planning, as Lead Agency, in accordance with CEQA and the CEQA Guidelines, and it is the authority and responsibility of elected City officials to examine the specifics of a proposed project to determine whether it would be in harmony with the applicable policies.

Regarding compatibility, as discussed on page IV.H-17 in Section IV.H, Land Use and Planning, of the Draft EIR, the intent of the compatibility analysis is to determine whether a project would be compatible with surrounding uses in relation to use, size, intensity, density, scale, and other physical and operational factors. The analysis is also intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by a project, with consideration given to the duration of any disruptions. The compatibility analysis may be based on aerial photography, land use maps, and field surveys, in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form based on a comparison of existing land use relationships in the vicinity of the Project Site under existing conditions, at the time the Notice of Preparation was issued.

The Project's potential land use impacts are analyzed on pages IV.H-39 to IV.H-57 and Appendix I of the Draft EIR, which included an analysis of the General Plan Framework Element (including the Land Use Chapter, Open Space and Conservation Chapter, Economic Development Chapter, Transportation Chapter, and Infrastructure and Public Services Chapter), General Plan Conservation Element, the Mobility Plan, Wilshire Community Plan, LAMC, Citywide Design Guidelines, and the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Section IV.A, Air Quality, of the Draft EIR also includes an analysis of SCAQMD's Air Quality Management Plan. As analyzed therein, the Project would not conflict with the goals, policies, and objectives in

¹⁵⁴ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, the Draft EIR concluded that impacts related to land use would be less than significant.

Comment Letter No. 303

Paul Lahn
332 N. Stanley Ave.
Los Angeles, CA 90036-2332

Comment No. 303-1

I recently heard about some of the plans for the TV City expansion and have a few questions about the development process. Specifically, I wanted to ask about the plans for power generation and fuel, both during the construction period and once the expansion is complete.

Response to Comment No. 303-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 303-2 through 303-4.

Comment No. 303-2

First, I am worried about the environmental impacts this project could have, based on my understanding of it. I heard there are plans to run the project on natural gas, even though we need to be emission free. How does that work? Is CBS buying carbon offsets, or planting an equivalent number of trees on the new property, or something to that effect? Are there plans for the site to transition purely to electricity in the coming years? When will that transition happen? Will the new studios at least be built to take advantage of natural solar, such that during the day there's less need for artificial lighting and A/C? Do we know how much the natural gas, and the emissions from cars and trucks coming to and from the site, will add to our community's carbon footprint? Answers to these questions must be considered before approving any new development, especially one going to 2050.

Response to Comment No. 303-2

Refer to Response to Comment No. 45-1 regarding the Project's compliance with the City's new all-electric buildings ordinance and new natural gas usage associated with the Project. Mobile source (e.g., cars and trucks) GHG emissions are provided in Table IV.E-11 (Annual Project GHG Emissions Summary) on page IV.E-78 of the Draft EIR.

As determined in the Draft EIR, the Project would have a less than significant impact with respect to GHG emissions. As such, mitigation measures (e.g., carbon offsets, planting additional trees) are not required under CEQA and were not considered further.

The buildout year included in this comment is incorrect. Refer to Response to Comment Nos. 9-24 and 26-E.1-24 for a discussion of the buildout timeline.

Comment No. 303-3

I also heard that there are plans to build fueling stations in the area. I am concerned that these fueling stations could prove harmful to the community if they are placed near living spaces—I doubt anyone here expected to living next to a new gas station. So I need to ask: how big are these fueling stations? How many pumps? Are they temporary for construction or permanent installations? What type of fuel will be used, and has its environmental impact been considered? How many fueling stations will there be, and how close or far will they be from living spaces? Couldn't these fueling stations be replaced with electric stations? Wouldn't electricity also be quieter for the public than loud diesel engines, if that is the fuel in question?

Response to Comment No. 303-3

The Project would not include fueling stations. This clarification is reflected in Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Additionally, as discussed on page II-33 of Section II, Project Description, of the Draft EIR, the Project would include electric vehicle (EV) charging infrastructure.

Comment No. 303-4

Along the same lines, I have not heard anything about where the trucks for this project will be driving. Obviously trucks will be needed for construction, both to bring equipment and building materials as well as to take an excavations and waste away. There are two levels of concern I have with this. First, we should make sure the trucks take as efficient a route as they can, so as to reduce the amount of exhaust that will choke the skies. So what will those routes be? At the same time, will these trucks be driving near residential areas? Will the trucks get caught in the increased traffic near these residential areas, causing exhaust to pile up near someone's home? What about truck idling in the street while unloading or when stuck in the typical daily traffic we have? I would like confirmation on where these trucks will go so that we know exactly what kind of impact we are looking at. I would also prefer electric trucks, but I understand that may not be feasible at this time.

Thank you for your time. I look forward to hearing back about some of these questions.

Response to Comment No. 303-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 for a discussion of the overall construction schedule, the estimate of the construction trip generation, construction traffic safety, haul routes, and the CTMP.

The Project has been modified to eliminate the off-site staging of haul trucks along streets serving the Project Site. All haul truck staging locations would be provided onsite; as such, no haul trucks would be idling offsite. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The truck fleet is changing to electric and natural gas-powered vehicles, in part as a result of the CARB decision to phase out diesel trucks by 2036, but the majority of construction trucks were conservatively assumed in the Draft EIR to be diesel trucks.

Comment Letter No. 304

John Lambert
434 N. Laurel Ave.
Los Angeles CA 90048-2351

Comment No. 304-1

I am writing about the DEIR that was just released for the Television City Project in Beverly/Fairfax neighborhood. This is just nonsense city planning that does nothing but make the lives of those of those [sic] who actually live in the neighborhood more miserable. As if we don't have enough traffic and gridlock to deal with already, adding a development that would hold over 8,000 employees is gross negligence in dealing with traffic. Please think about the people who actually live here and not some big developer who is trying to make quick buck of the misery of others.

Response to Comment No. 304-1

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 304-2

Just examining what is out there about this project, the whole idea just does not make any sense to me.

Response to Comment No. 304-2

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 304-3

Developing a massive project by the Le [sic] Brea Tar Pits does not seem like a good idea, adding more traffic does not seem like a good idea, adding 8,000 employees who need a place to park and will fill up our streets does not seem like a good idea, so it just makes me wonder what part of this project is a good idea?

Response to Comment No. 304-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Also pursuant to SB 743, traffic congestion is not a CEQA impact. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 regarding the non-CEQA LOS analysis in the Transportation Assessment

This comment discussing the opinions of the commenter is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to taking any action on the Project.

Comment No. 304-4

If you are going to add all of these people to the area why not include housing? It seems like the City cares more about the developer than the citizens in our community. All that I am asking is that you consider the neighbors and what is best for us, and this development is not it.

Response to Comment No. 304-4

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment Letter No. 305

Cecile Lamonte
7933 Blackburn Ave.
Los Angeles, CA 90048-4417

Comment No. 305-1

I'm writing on behalf the TVC 2050 application. The Draft EIR has zero details, and there needs to be an in-depth review of impacts to streets. The location of the planned project sits in one of the busiest intersections in one of the busiest areas of Los Angeles.

Response to Comment No. 305-1

The Draft EIR, and the Project Description therein, meet the requirements of CEQA and provide sufficient detail to evaluate impacts. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not transportation impacts under CEQA. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 305-2

How will the project—at the corner of what I understand have been deemed **two** high injury network streets, Beverly Blvd and Fairfax—impact safety? The draft EIR gives no specifics about what it means for a street to be in the high injury network, but it's no surprise that they are. So what determines a high injury street? What are the high injury statistics for those two streets? What are the findings on what the increase in high injury accidents will be when this project is being built? And when it is done? What is the project planner required to do as a result of his project being at the corner of two high injury network streets? I would expect different measure would have be taken, right? since going into the project, we all know those streets will be hugely affected.

There are numerous primary streets and intersections impacted. Do you know the exact number of primary streets and intersections that will be impacted by the project? What are those streets? What community members will be the most impacted on these streets? What was the process for getting input from these community members in deciding where a project like this would be located?

How can the DEIR not acknowledge any details or review potential impacts? There are definitely significant impacts. Why does the development try to claim that the only significant impacts will be during construction? Do you plan to acknowledge and release these details?

LADOT has spent \$50.6 million so far this year for Vision Zero projects, and we shouldn't allow plans that are only in concept to threaten the future of safe roads. How will this project affect that program in the Beverly Fairfax neighborhood? What will the spending be for the rest of the year? What will the spending be for the following year? What specifically will the impact be on our Vision Zero goals?

Response to Comment No. 305-2

Refer to Response to Comment No. 162-2 regarding the Project's location on roadways that are part of the High Injury Network (HIN) and Vision Zero improvements. Vision Zero is a national program aimed at reducing serious injuries and fatalities on the nation's transportation system. The City of Los Angeles joined this program and has been implementing traffic safety improvements with particular emphasis along the HIN, a collection of street segments within the City that has experienced the highest level of traffic injuries and fatalities. The HIN includes Beverly Boulevard from La Cienega Boulevard to La Brea Avenue and Fairfax Avenue from Melrose Avenue to Wilshire Boulevard. While these two roadway segments have experienced high incidents of injury accidents, there have been no pedestrian, bicycle, or vehicular fatalities in the area during the years 2018-2021 (the latest years for which data are available).

Refer to Topical Response No. 15, Transportation Improvement Program. As discussed therein, a primary component of the Project's Transportation Improvement Program is aimed at Vision Zero and Transportation Systems Management improvements that would focus on traffic safety measures in the Project vicinity. Thus, it is expected that expenditures on traffic safety improvements will increase in the Project area.

Refer to Topical Response No. 12, Safety and Congestion, for an additional discussion of the design and operations of the Project driveways and both vehicular and pedestrian safety in the area.

The non-CEQA portion of the Transportation Assessment (Appendix M.1 of the Draft EIR) summarizes the Project's potential impact on the streets and key intersections in the Study Area. Figure 6 on page 34 of the Transportation Assessment shows the Study Area main streets and the location of the 31 study intersections. Table 18 on page 162 summarizes the Project's effects on the LOS of the key study intersections.

The Draft EIR reviewed all impacts that are required to be reviewed under CEQA. Whether an impact was deemed significant or not was determined according to the thresholds prescribed by the CEQA Guidelines, published annually by the Office of Planning and Research. Analysis of each CEQA-related impact from the Project is provided in its respective section of the Draft EIR. The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 306

Jill Landsman
8148 W. Fourth St.
Los Angeles, CA 90048-4416

Comment No. 306-1

Thank you for the opportunity to express my opinion as a resident of the Beverly Fairfax neighborhood. I am concerned about the proposed expansion of Television City.

Response to Comment No. 306-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 306-2

I have lived here 30 years and this is a historic area, and we are proud of and need to honor that history. Television City has been around a long time, and while it is true that production technology has changed, that doesn't mean a huge new office building needs to be constructed in this neighborhood. Stages can be upgraded without enlarging them. This addition is unnecessary and unacceptable as proposed. It is important to preserve the integrity of this iconic landmark in our community.

Response to Comment No. 306-2

This comment is nearly identical to Comment No. 199-2. Refer to Response to Comment No. 199-2, above.

Comment No. 306-3

I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

Response to Comment No. 306-3

This comment is identical to the last sentence of the first paragraph in Comment No. 86-2 and the last sentence in Comment No. 111-1. Refer to Response to Comment Nos. 86-2 and 111-1, above.

Comment No. 306-4

Does the developer of this proposed monstrosity believe that new office space is going to benefit the community? Also, bringing more audience members to the site is not what my neighbors and I want. What we need is housing and to protect the fabric of this wonderful community, neither of which will happen with the addition of this development.

Response to Comment No. 306-4

This comment is identical to Comment No. 199-3. Refer to Response to Comment No. 199-3, above.

Comment No. 306-5

Thank you for your attention. Our community is important!

Response to Comment No. 306-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 307

Mark Landsman
8148 W. Fourth St.
Los Angeles, CA 90048-4416

Comment No. 307-1

Thank you for the opportunity to express my opinion as a resident of the Beverly Fairfax neighborhood. I am concerned about the proposed expansion of Television City.

Response to Comment No. 307-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 307-2

This is a historic area, and we are proud of and need to honor that history. Television City has been around a long time, and while it is true that production technology has changed, that doesn't mean a huge new office building needs to be constructed in this neighborhood. Stages can be upgraded without enlarging them. This addition is unnecessary and unacceptable as proposed. It is important to preserve the integrity of this iconic landmark in our community.

Response to Comment No. 307-2

This comment is identical to Comment No. 199-2. Refer to Response to Comment No. 199-2, above.

Comment No. 307-3

Does the developer of this proposed monstrosity believe that new office space is going to benefit the community? Also, bringing more audience members to the site is not what my neighbors and I want. What we need is housing and to protect the fabric of this wonderful community, neither of which will happen with the addition of this development.

Response to Comment No. 307-3

This comment is identical to Comment No. 199-3. Refer to Response to Comment No. 199-3, above.

Comment No. 307-4

Thank you for your attention. Please do not allow this change to our community.

Response to Comment No. 307-4

This comment, which concludes the comment letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 308

Eva Langer
361 N. Poinsettia Pl.
Los Angeles, CA 90036-2506

Comment No. 308-1

I am very concerned about the TVC 2050 Plan and what it will do to our Beverly Fairfax neighborhood and the neighborhood that surround the site.

Response to Comment No. 308-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 308-2

The plan for our area, the Wilshire Community Plan, provides for a Residential Neighborhood Protection Plan. Why doesn't the Draft EIR discuss how the proposed project will affect the Residential Neighborhood Protection Plan for our community? That plan addresses how to deal with impacts from traffic and parking, so what about inconsistencies and incongruencies of the proposed project with our neighborhood plan?

Response to Comment No. 308-2

The Project's consistency with applicable policies in the Wilshire Community Plan, including policies related to the Residential Neighborhood Protection Plan, was analyzed in Table IV.K-2 in Section IV.K, Transportation, of the Draft EIR. Specifically, refer to the analysis of Objective 14-1 and Policy 14-1.1 on pages IV.K-62 and IV.K-63 of the Draft EIR. As stated therein, the Project would contribute to and implement traffic-calming measures as part of an NTMP to address potential "cut-through" trips on surrounding residential streets. Further, the Project would include sufficient parking to meet the needs of employees and visitors at the Project Site, thereby ensuring that there would be no spillover parking. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for further discussion of the proposed NTMP. Refer also to Topical Response No. 13, Parking, regarding the adequacy of the proposed on-site parking supply to meet the peak parking demands of the Project and prevent spillover parking. It is also noted that off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 308-3

Cut-through traffic and spillover parking from nearby commercial areas and businesses are supposed to be identified—including when a project as impactful as this one is being considered.

Response to Comment No. 308-3

Section 5C of the Transportation Assessment (Appendix M.1 of the Draft EIR), beginning on page 167, analyzes the potential non-CEQA transportation effects on the surrounding residential neighborhoods and identifies two neighborhood areas that meet LADOT's criteria for further study of potential cut-through traffic. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 308-4

There have been no neighborhood meetings held, as one of the objectives of the Wilshire Community Plan states, to discuss the impacts the project will have on our neighborhood and neighborhood streets. When will these meetings be held?

Response to Comment No. 308-4

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 308-5

Where have traffic calming programs and strategies been outlined for the community to view and give input to?

Response to Comment No. 308-5

Refer to the LADOT page on the City of Los Angeles website. See the LADOT "My Neighborhood" page (<https://ladot.lacity.org/residents/my-neighborhood>) for examples of the types of improvements being installed in neighborhoods across the City to increase safety and control cut-through traffic. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for information about the proposed NTMP.

Comment No. 308-6

The draft EIR refers to construction worker or equipment parking on adjacent streets or predominantly residentially zoned areas will be prohibited. How is the developer going to ensure that that doesn't happen? How would an on-site construction manager be able to ensure that from happening? How is "predominantly residentially zoned areas" defined? Does that mean parking in a surrounding neighborhood which has mixed uses, such as some neighborhood businesses with residential, is going to be allowed? Despite the repeated claim that sufficient parking to meet the needs of employees and visitors, the numbers don't add up—not with parking for 5,300 and the expected number of employees and visitors. Please explain the basis for that claim and make clear the numbers.

Response to Comment No. 308-6

As discussed in Response to Comment No. 254-8, construction workers would park on-site. Construction workers would be prohibited from parking off-site as part of the required CTMP prepared pursuant to Project Design Feature TR-PDF-1. Residents would have the name and contact information for the Project construction manager who could be called to report encroachment into the neighborhood. LADOT parking enforcement could then be deployed in those neighborhoods with Residential Parking Permits to respond to any encroachment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 308-7

How will the developer make up for the loss of some of the on-street metered parking spaces that are going to be removed? Where will parking that would normally use those spaces now park? On what streets and at which locations will the on-street parking be removed?

Response to Comment No. 308-7

With respect to on-street metered parking, the Project does not propose to remove any such parking.

Comment No. 308-8

Thank you for addressing my questions.

Response to Comment No. 308-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 309

Lois Lanyard
740 N. Kings Rd., Apt. 311
Los Angeles, CA 90069-5479

Comment No. 309-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 309-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 310

Nick Lapiana
141 N. Harper Ave.
Los Angeles, CA 90048-3503

Comment No. 310-1

I am writing to express my concerns regarding the proposal for the TV City expansion.

Response to Comment No. 310-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 310-2 through 310-8.

Comment No. 310-2

I am concerned about the lack of specifics contained within the plan, particularly when it comes to noise during the construction phase and after the-construction is complete.

Response to Comment No. 310-2

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Refer to Response to Comment No. 9-24 regarding the buildout timeline and Response to Comment No. 26-138 regarding the construction timeline related to noise.

Noise during both construction and operation is fully analyzed in Section IV.I, Noise, of the Draft EIR.

Comment No. 310-3

Construction obviously produces all types of noise: noise from the trucks driving in and out of and on the construction site, from the construction equipment itself, and from the construction activities. What kinds of construction trucks and equipment will be entering the property? What times of day will there be construction activities and which days of the week? Are there certain days and times of the day that we will not have to deal with construction vehicles driving into and out of the area? What permits do these vehicles need, and are they different for the different kinds of equipment? It doesn't seem there has

been any acknowledgement of how all this noise and hours of construction will impact residents.

Response to Comment No. 310-3

This comment is identical to the first paragraph of Comment No. 161-2. Refer to Response to Comment No. 161-2, above.

Comment No. 310-4

Where is the information about what kinds of noise, from what sources, and which streets and neighbors are going to be impacted the most and the least? Please don't just tell me where to find the information, as I can't make my way through some long and complicated report. Please respond to those questions above when you respond to this letter. And I want to know how this information was derived—what are the thresholds for noise pollution? Who decides what those thresholds are?

Response to Comment No. 310-4

This comment is identical to the second paragraph of Comment No. 161-2. Refer to Response to Comment No. 161-2, above.

Comment No. 310-5

How was it determined when construction can occur? Are all of the other activities that are happening in the area at the same time taken into account when any analysis of noise levels was done—noise from daily commuting, weekends when more shoppers and visitors may visit the area?

Response to Comment No. 310-5

This comment is identical to Comment No. 161-3. Refer to Response to Comment No. 161-3, above.

Comment No. 310-6

What is going to be done to mitigate the different sources and times of noise? If the project could take three years or it could twenty years, that suggests construction could be ongoing for upwards of twenty years. What construction activities will occur in each of those years and generating what levels of noise? And what steps in each of those years will be taken to keep noise levels to a minimum?

Response to Comment No. 310-6

A comprehensive analysis of potential noise impacts is provided in Section IV.I, Noise, of the Draft EIR. Page IV.I-56 of the Draft EIR includes Mitigation Measure NOI-MM-1 to reduce construction noise impacts associated with the Project. Refer also to Response to Comment No. 26-136 regarding additional measures added to Mitigation Measure NOI-MM-1.

Refer to Response to Comment No. 161-2. As discussed therein, the noise assumptions for each piece of construction equipment are provided in Table IV.I-9 of Section IV.I, Noise, of the Draft EIR, and the resulting noise levels at each receptor location are provided in Table IV.I-10 of the Draft EIR. Noise levels with the implementation of mitigation are provided in Table IV.I-19 of the Draft EIR.

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

Comment No. 310-7

Furthermore, with the number of soundstages that will be added, including outdoor soundstages, what will be the sound dampening efforts to deal with the noise once in use? What days and hours will the outdoor soundstages be allowed to operate? On what basis is it determined what days and hours of the week those outdoor stages can be used?

Response to Comment No. 310-7

Refer to pages IV.I-43 through IV.I-48 of Section IV.I, Noise, of the Draft EIR for an analysis of noise associated with operation of the Project including noise from outdoor production activities and potential impacts to nearby sensitive receptors. As demonstrated therein, noise impacts associated with operation of the Project would be less than significant. Refer to Response to Comment No. 26-135 regarding the conservative assumptions used in the noise analysis. Also refer to Response to Comment No. 26-146 regarding the analysis of outdoor production activities that was conducted for the Project. In addition, as discussed on page IV.I-44 in Section IV.I, Noise, of the Draft EIR, the sound stage building shell would be designed to provide sound insulation to ensure that any noise would be contained within the sound-insulated stage. The Project Site would continue to operate on a 24-hour basis. Per Project Design Feature NOI-PDF-5, outdoor studio production activities will be prohibited within 200 feet of the Shared Eastern Property Line adjacent to the existing multi-family residence located immediately east of the Project Site (receptor location R1) between the hours of 10 P.M. and 7 A.M.

Comment No. 310-8

The community needs specifics about what the plan is and what the impacts will be. People who live here need clarity and to know exactly how they will be impacted. Telling residents that there will be no impacts is just true.

Response to Comment No. 310-8

This comment is identical to Comment No. 161-4. Refer to Response to Comment No. 161-4, above.

Comment No. 310-9

Thank you for responding to these questions and concerns.

Response to Comment No. 310-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 310-2 through 310-8.

Comment Letter No. 311

Sara Laskey
102 S. Detroit St.
Los Angeles, CA 90036-2914

Comment No. 311-1

I'm writing on behalf the TVC 2050 application. The Draft EIR has zero details, and there needs to be an in-depth review of impacts to streets. The location of the planned project sits in one of the busiest intersections in one of the busiest areas of Los Angeles.

Response to Comment No. 311-1

This comment is identical to Comment No. 305-1. Refer to Response to Comment No. 305-1, above.

Comment No. 311-2

How will the project—at the corner of what I understand have been deemed **two** high injury network streets, Beverly Blvd and Fairfax—impact safety? The draft EIR gives no specifics about what it means for a street to be in the high injury network, but it's no surprise that they are. So what determines a high injury street? What are the high injury statistics for those two streets? What are the findings on what the increase in high injury accidents will be when this project is being built? And when it is done? What is the project planner required to do as a result of his project being at the corner of two high injury network streets? I would expect different measure would have be taken, right? since going into the project, we all know those streets will be hugely affected.

Response to Comment No. 311-2

This comment is identical to a portion of Comment No. 305-2. Refer to Response to Comment No. 305-2, above.

Comment No. 311-3

There are numerous primary streets and intersections impacted. Do you know the exact number of primary streets and intersections that will be impacted by the project? What are those streets? What community members will be the most impacted on these streets?

Response to Comment No. 311-3

This comment is identical to a portion of Comment No. 305-2. Refer to Response to Comment No. 305-2, above.

Comment No. 311-4

What was the process for getting input from these community members in deciding where a project like this would be located?

Response to Comment No. 311-4

This comment is identical to Comment No. 99-3. Refer to Response to Comment No. 99-3, above.

Comment No. 311-5

How can the DEIR not acknowledge any details or review potential impacts? There are definitely significant impacts. Why does the development try to claim that the only significant impacts will be during construction? Do you plan to acknowledge and release these details?

Response to Comment No. 311-5

This comment is identical to Comment No. 99-4. Refer to Response to Comment No. 99-4, above.

Comment No. 311-6

LADOT has spent \$50.6 million so far this year for Vision Zero projects, and we shouldn't allow plans that are only in concept to threaten the future of safe roads. How will this project affect that program in the Beverly Fairfax neighborhood? What will the spending be for the rest of the year? What will the spending be for the following year? What specifically will the impact be on our Vision Zero goals?

Response to Comment No. 311-6

This comment is identical to a portion of Comment No. 99-5. Refer to Response to Comment No. 99-5, above.

Comment No. 311-7

Thank you for your time.

Response to Comment No. 311-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 312

Ariel Lawrence
439 N. Ogden Dr.
Los Angeles, CA 90036-1748

Comment No. 312-1

I hope this letter finds you well. I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I have lived in the area for the past 2 years and I'm devastated as I continue to learn about the details (although not many have been provided to the public) about this development right in my back yard.

Response to Comment No. 312-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 312-2.

Comment No. 312-2

We have so many questions as neighbors: How do you expect all these new employees to get to work? Where do they park? How am I, as a neighbor, supposed to navigate this new congestion on the streets? Do any of you all live this area? Are you not concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Response to Comment No. 312-2

This comment is identical to Comment No. 95-2. Refer to Response to Comment No. 95-2, above.

Comment No. 312-3

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I

pray and hope that you do the same with this development. We need more leaders fighting for a better future, not just fighting for a big check.

Thank you for your time.

Response to Comment No. 312-3

The first paragraph of this comment is identical to Comment No. 95-3, and the second paragraph is identical to Comment No. 95-4. Please refer to Response to Comment Nos. 95-3 and 95-4, above.

Comment Letter No. 313

Kristina Leach
506 N. Sweetzer Ave.
Los Angeles, CA 90048-2606

Comment No. 313-1

As an avid cyclist and walker, I'd like to express my deep concerns about the draft EIR submitted for the TVC 2050 project.

Response to Comment No. 313-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 313-2 and 313-3.

Comment No. 313-2

The construction management plan filed by the developer say he will "contribute" to the creation of bicycle and pedestrian improvements in the area but doesn't detail what those improvements will be. What does contribute mean? Does this mean the developer will simply cut the city a check and walk away from any requirement to provide a detailed plan? How can area residents be expected to support a massive construction project without knowing how traffic, pedestrians and cyclists will be impacted?

Response to Comment No. 313-2

An evaluation of the Project's impacts on transportation is included in Section IV.K, Transportation, of the Draft EIR. As concluded therein, impacts would be less than significant. Discussion, description, and illustration of proposed bicycle and pedestrian improvements associated with the Project are included in the following:

- Pages IV.K-37 through IV.K-40 (Project Design Features TR-PDF-2 and TR-PDF-3) in Section IV.K, Transportation, of the Draft EIR
- Pages II-26 and II-28 (Figure II-8) in Section II, Project Description, of the Draft EIR
- Pages IV.H-32 through IV.H-37 (including Figures IV.H-3 through IV.H-6) and pages IV.H-47 through IV.H-53 in Section IV.H, Land Use and Planning, of the Draft EIR

Refer to Topical Response No. 7, Mobility Hub, and Topical Response No. 15, Transportation Improvement Program, for further information regarding proposed pedestrian and bicycle improvements associated with the Project. Also refer to Response to Comment No. 557-3.

Comment No. 313-3

This project will affect the lives of many people on a daily basis. Trying to navigate this area on foot or on a bike is already dangerous. Now, the developer is planning on introducing hundreds of tractor trailers during the construction phase of the project and when occupied, hundreds more production trucks, all idling on the site, spewing diesel fumes and degrading air quality. How many will there be? Over how many months will we be dealing with them? What safety protocols have to be met? What measures will be taken to ensure pedestrian and bicycling safety when those trucks and equipment will be on our streets, maybe pulling over to the sidewalk and adding congestion to our street?

Response to Comment No. 313-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and haul routes. The number of construction trucks during the busiest construction phases of the Project are detailed in Topical Response No. 14. Construction was analyzed over a 32-month period in order to provide a conservative analysis. In addition, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is also included for each of the environmental topics studied in the Draft EIR.

All haul truck staging locations would be provided onsite, so no haul trucks would be idling offsite. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The CTMP would govern the travel routes and entry/exit points for the construction trucks. Busy truck activity times would have flag personnel at the Project entrances to assist trucks entering and leaving the Project Site in order to improve safety for both vehicles passing the Project Site and pedestrians along the adjacent sidewalks.

As shown on pdf page 32 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR, approximately 640 daily truck trips over 185 working days for the excavation/foundation phase were evaluated for potential impacts under the short-term buildout scenario. Under the long-term buildout scenario, substantially fewer daily truck trips would be expected since the same scope of construction (requiring the same total number of truck trips) would be spread over a longer period of time. Please refer to

Response to Comment No. 164-3 for additional discussion of traffic impacts and idling limitations.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Truck activity generated by the completed Project is expected to be approximately 36 semi-truck trips per day and 130 single unit truck and van trips per day. Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, regarding the truck trip estimates during Project operation.

Comment No. 313-4

I would ask that you hit “pause” on this project and tell the developer to provide a lot more detail to neighborhood residents before the EIR is approved. Traffic and air quality in Los Angeles are already bad enough. I can’t see how approving this project makes them any better.

Response to Comment No. 313-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 313-2 and 313-3.

Comment Letter No. 314

Leigh Leavitt
351 N. Ogden Dr., Apt. 3
Los Angeles, CA 90036-2124

Comment No. 314-1

The scope of this project is not at all clear. According to the Draft EIR, any use in the C2 zones will be permitted.

There are over 100 uses permitted in the C2 zone—virtually any kind of retail store, massive auditoriums, museums, hotels, car washes, schools, auto repair facilities, building material stores, hospitals, nursing facilities, medical laboratories, and even a circus.

Response to Comment No. 314-1

This comment is substantively similar to Comment Nos. 62-4 and 224-1. Refer to Response to Comment Nos. 62-4 and 224-1 regarding the proposed uses.

Comment No. 314-2

Making movies and television shows can be very loud and can happen anywhere onsite at all hours. Because there is no set plan of development, noisy activities can happen anywhere. How do we know that the EIR correctly calculated noise impacts? The EIR didn't assume loudest activities at property lines but it should have [sic] so now.

Response to Comment No. 314-2

The issues discussed in this comment are similar to those in Comment No. 147-3. Refer to Response to Comment No. 147-3, above.

Comment No. 314-3

Many of these uses and their related impacts have not been analyzed. Our community deserves to know what is planned for where we live—please provide an analysis of all of these likely and potential impacts.

Response to Comment No. 314-3

Section IV, Environmental Impact Analysis, of the Draft EIR, contains a comprehensive analysis of the Project's environmental impacts during both construction and operation. Refer to Topical Response No. 1, Clearly Defined Project Description and

Specific Plan, and Topical Response No. 3, Permitted On-Site Uses, for details of the proposed development program. Specific issues raised by the commenter are addressed in Response to Comment Nos. 314-1 and 314-2.

Comment Letter No. 315

Irvin Lebovics
8635 W. Third St., Ste. 580W
Los Angeles, CA 90048-6144

Comment No. 315-1

I found it very gratifying to learn that the Draft Environmental Impact Report for Television City's TVC 2050 project found no significant impacts during its operation. To me that means that a great deal of effort, along with a substantial financial commitment, went into planning the project's design.

The number one complaint that most everyone I know has with any new development is the potential impact on traffic. The TVC 2050 plan will invest millions in transportation improvements to create a multi-modal mobility hub. This hub will connect studio workers and the neighborhood to several nearby transit options, including the Metro D line's Wilshire/Fairfax station. This will encourage more efficient and sustainable ways to commute.

Additionally, Television City is committed to creating a robust Transportation Demand Management Plan for employees to encourage transit use. Plans also call for several types of offsite transportation improvements.

As a longtime resident and communal leader in the Beverly-Fairfax neighborhood, I have been especially impressed with the outreach to our community by TVC 2050. This plan will create jobs, and beautify the area, while paying special attention to environmental issues.

I support TVC 2050. It will greatly improve the neighborhood, while investing in our city's strongest economic industry.

Response to Comment No. 315-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 316

Jimmy Lee
143 S. Edinburgh Ave.
Los Angeles, CA 90048-3605

Comment No. 316-1

My concerns about this project are mainly about traffic and parking. Why doesn't the project have any dedicated lanes to get trucks and cars off the street? The project should provide dedicated lanes to make right turn lanes onto project. Please analyze the ability of the project to provide these lanes.

Response to Comment No. 316-1

The Project frontage along Fairfax Avenue already has a wide right lane that can be used as a right-turn lane. The frontage along Beverly Boulevard has a parking lane that would serve as a de facto right-turn lane allowing vehicles to get out of the through lane to make their turn into the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 83-1 regarding access and turn lanes.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nonetheless, refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 316-2

Also, why is most of the parking located on Grove Drive? There is no way that this many cars can use Grove Drive.

Response to Comment No. 316-2

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site.

Comment No. 316-3

Please show an alternative with parking distributed around the property and a more realistic plan for the 18 wheel trucks.

Response to Comment No. 316-3

Refer to Topical Response No. 16, Project Alternatives Analysis, for a discussion of alternatives suggested during public comment. As discussed therein, while an EIR must describe a range of reasonable alternatives that avoid or reduce a project's significant impacts, it "need not consider every conceivable alternative to a project." (CEQA Guidelines Section 15126.6(a).) Because the Project will not have any significant impacts related to access and/or parking, consideration of the alternative suggested in this comment is not required under CEQA. Further, CEQA establishes no categorical legal imperative as to the scope of the alternatives to be analyzed in the EIR. This suggestion is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Truck access to the Project Site would primarily be through the three signalized driveways. Once on the site, trucks can reach anywhere on the Project Site. Each driveway has been designed to accommodate the required turning radii for the various size trucks that would use the Project Site.

Comment Letter No. 317

Kerry Lee
1401 Douglas St.
Los Angeles, CA 90026-3461

Comment No. 317-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 317-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 318

Alex Leeming
alexandraleeming@gmail.com

Comment No. 318-1

Reaching out regarding the TVC 2050 Project. I currently live on Genesee Street, I can see the CBS building and James Corden's face from my living room. I also work in the entertainment industry and understand that growth is good and means more jobs etc. However, I firmly disagree with the scale of this project.

Response to Comment No. 318-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 318-2 through 318-8.

Comment No. 318-2

The Beverly/Fairfax neighborhood is already overcrowded, most of the apartments and houses in the area require street parking which is already very difficult. During rush hour, it can take 10 minutes to drive one block as the roads are so congested. Bringing a construction job of this size to the neighborhood would further this issue, no doubt.

Response to Comment No. 318-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and haul routes.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 318-3

I don't think I need to spell out why 30 years of construction seems like a nightmare.

Response to Comment No. 318-3

Refer to Response to Comment No. 9-24 regarding the Project timeline. Construction would not last for 30 years as incorrectly stated in this comment.

Comment No. 318-4

I do want to voice that any tall or high rise buildings would be an eyesore and disruption to the neighborhood and the views that we hold onto in our historic neighborhood.

Response to Comment No. 318-4

Refer to Response to Comment No. 11-3 regarding the compatibility of the Project's heights with the surrounding community.

Comment No. 318-5

If this were an affordable housing project, I would be able to get behind the construction and the tall buildings, however this project is not bringing positive change to the community at large.

Response to Comment No. 318-5

This comment, which does not raise a CEQA issue, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 318-6

I understand that construction will happen in some form, I just hope that the scale of the project is reduced and there can be a middle ground.

Response to Comment No. 318-6

Alternatives 2 and 3 represent a reduction in development compared to the Project. However, neither of these alternatives would avoid or substantially reduce the Project's significant and unavoidable impacts, and would not meet Project objectives to the same extent as the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 318-7

I am also very concerned about the environmental impact in a city that already has poor air quality.

Response to Comment No. 318-7

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please refer to Section IV.A, Air Quality, of the Draft EIR for an analysis of the Project's air quality impacts.

Comment No. 318-8

I just want to reiterate that a "regional center" designation is inappropriate.

Response to Comment No. 318-8

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 318-9

I encourage you to spend more time reviewing the draft EIR, and connecting with community members to understand the detriment this will cause in the neighborhood.

Response to Comment No. 318-9

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing, the public comment period, and future public hearings.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 319

Linda Lena
435 N. Sierra Bonita Ave.
Los Angeles, CA 90036-2470

Comment No. 319-1

As a 20 year resident, I am concern with the Television City expansion. The project's Draft EIR leaves out a lot of information. Please provide further details to me, as a resident, so I can be aware of what is proposed.

Response to Comment No. 319-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 319-2 through 319-6.

Comment No. 319-2

1. The traffic situation is a concern. How have the residents of the neighborhood, families from the nearby schools, and nursing home residents (and their families) been notified of the potential additional traffic during 20+ years of construction? What are going to be the largest and most significant impacts of all that additional traffic? It's not as though you can make sure there is no additional traffic unless the project never happens, so what is going to be done to mitigate the impacts of all that traffic?

Response to Comment No. 319-2

Noticing for the Project has been conducted in accordance with CEQA. Refer to Response to Comment No. 32-3.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and haul routes.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, mitigation is not required.

Comment No. 319-3

2. Will vehicles be routed on particular roads? Where will the majority of traffic be directed and why? If the trucks are going to drive up and back on Fairfax toward the site, have all of the impacts of those truck trips been communicated to the affected people and businesses all along Fairfax?

Response to Comment No. 319-3

Refer to Response to Comment No. 9-31 regarding trip distribution. The routes affected by Project trips are shown in Figure 21 on page 77 of the Transportation Assessment (Appendix M.1 of the Draft EIR). Figure 19 on page 70 of that document shows that only six percent of the Project cars and trucks are projected to use Fairfax Avenue south of Wilshire Boulevard because most of the employees are likely to live northeast and northwest of the Project Site in the Hollywood area and in the San Fernando and San Gabriel Valleys. The distribution of employee residences is proprietary information held closely by other studios. As such, EIRs for previous studio projects are the only public sources of information for studio trip distribution.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding truck haul routes.

Comment No. 319-4

3. Please provide information about how the Vehicle Miles Travelled analysis was performed. How was it determined that workers at Television City will only drive an average of 3.5 miles? That's not realistic at all. There is little housing available, and none of it is affordable, so you must know that all those workers will be driving many more miles than that. How do you take into account those miles when the other kind of analysis was done?

Response to Comment No. 319-4

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 319-5

4. What safety measures will be taken to protect the neighbors, including school children, with all of the increased car and truck traffic? And of the increased driving that will happen on our neighborhood streets because we all know that is going to happen? Please provide information about additional police patrol presence; noise mitigation for during construction and when the facilities, once complete, are holding events; and air quality measures based on the anticipated additional traffic.

Response to Comment No. 319-5

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 35-146 and 26-E.4-3 regarding pedestrian safety.

Police protection would continue to be provided by LAPD. Potential impacts associated with police protection were fully analyzed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and were determined to be less than significant.

Air quality and noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively.

Refer to Section C, Special Events, of Topical Response No. 10, Trip Generation, regarding special events.

Comment No. 319-6

5. The parking is listed as 5,300 spaces. How will overflow parking be handled?

Response to Comment No. 319-6

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is not needed to meet the Project's peak parking

demands and, therefore, is not proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment Letter No. 320

Don Leonard
1820 El Cerrito Pl., Apt. 105
Los Angeles, CA 90068-3701

Comment No. 320-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 320-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 321

Ronny Leroy
8108 W. Fourth St.
Los Angeles, CA 90048-4416

Comment No. 321-1

I am writing this letter to state my opposition to the proposed television City project. The lack of transparency around this project by both the city and applicant is concerning, and I have serious concerns about the impacts this project will have on our neighborhood. I do not agree that the claim of economic benefits outweighs all of the negative impacts this will have in my neighborhood and to the community.

Response to Comment No. 321-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With respect to the claim regarding transparency, refer to Response to Comment No. 32-3.

Additional issues raised by the commenter are addressed in Response to Comment Nos. 321-2 through 321-8.

Comment No. 321-2

The community was not given the specific plan for this site and it is unclear if and when the city ever got a hold of the specific plan. How can you as elected officials render judgment on this project without that information? The alternative possibility is that the city had the specific plan and chose not to share it, which raises even more questions.

Response to Comment No. 321-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR. Refer to Topical Response No. 1 regarding the timing of environmental review.

Comment No. 321-3

Even without the specific plan, the reported facts are extremely concerning.

Response to Comment No. 321-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 321-4

Tens of thousands of trucks trips?

Response to Comment No. 321-4

The commenter's assertion about the number of truck trips is incorrect. Refer to Section E, Truck Trips, in Topical Response No. 10, Trip Generation, regarding the truck trip generation estimates during Project operation.

Comment No. 321-5

20 years of construction?

Response to Comment No. 321-5

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Comment No. 321-6

The city needs to make clear all of the specific impact! this will have to the quality of life in Beverly Fairfax neighborhood and what is going to be done about those impacts? Residents should not be forced to accept and live with a project that has "unavoidable impacts". [sic]

Response to Comment No. 321-6

Refer to Section I, Executive Summary, and Section VI, Other CEQA Considerations, of the Draft EIR for summaries of the Project's significant and unavoidable impacts. Detailed analyses supporting these conclusions are provided throughout Section IV, Environmental Impact Analysis, of the Draft EIR.

All of the proposed PDFs and mitigation measures are also listed in Section I, Executive Summary, of the Draft EIR, as well as in each respective section in Section IV, Environmental Impact Analysis. These measures are enforceable as conditions of approval for the Project. Refer to Section IV, Mitigation Monitoring Program, of this Final EIR for details regarding timing, enforcement, and actions indicating compliance.

As discussed in Section VI, Other CEQA Considerations, of the Draft EIR, while the Project would have significant and unavoidable impacts with regard to construction-related regional emissions, noise, and vibration, such impacts would only occur during temporary and periodic construction activities, similar to those occurring at other development sites in urban areas, particularly within infill locations. As such, the benefits of the Project would outweigh the effects of its temporary significant and unavoidable impacts.

Please note that quality of life is not a CEQA impact. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 321-7

- How will our air quality be affected by construction and truck dust?

Response to Comment No. 321-7

As shown in Tables IV.A-10 and IV.A-11 of the Draft EIR, after the application of mitigation, localized air quality impacts, including particulate (i.e., dust) impacts, would not exceed SCAQMD LST thresholds, and impacts would be less than significant. Refer to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust.

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, which includes mandatory control actions and dust control contingency measures to control fugitive dust.

Comment No. 321-8

- How long will our commutes increase?
- How will 8,000 employees turning in and out of this site affect our traffic patterns?
- How will the city increase safety measures for pedestrians with all of these new trucks and commuters?

Response to Comment No. 321-8

Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the change in intersection delay as a result of the Project. Of the 31 study intersections, the addition of Project trips would not cause any intersection operating at LOS D or better to change to LOS E or F. Project trips did result in an increase in overall delay at the study intersections, but on average, the intersection delays increased by approximately 2.2 seconds per vehicle in the morning peak hour and approximately 2.4 seconds per vehicle in the afternoon peak hour. How long an individual's commute would increase would depend on the number of intersections the commute route took the driver through on the way from work to home.

The effects of the vehicle trips in and out of the Project Site during the peak hours of the day are summarized in Table 18 of the Transportation Assessment as described above.

Furthermore, driver delay (i.e., LOS) is no longer a CEQA-related impact under SB 743.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding access and pedestrian safety. Note that a large part of the Project's Transportation Improvement Program (summarized in Topical Response No. 15, Transportation Improvement Program) is aimed at traffic safety improvements for both vehicles and pedestrians.

The comment regarding the City's safety measures is not related to the Project's CEQA analysis. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 321-9

None of the above questions have been answered. I ask that until they are, this project not be allowed to move forward.

Response to Comment No. 321-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 321-2 through 321-8.

Comment Letter No. 322

Esther Lester
7815 Beverly Blvd.
Los Angeles, CA 90036-2111

Comment No. 322-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 322-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 323

Lauren Letherer
451 N. Stanley Ave.
Los Angeles, CA 90036-2396

Comment No. 323-1

I am worried about the environmental consequences of this project. As a community resident of 4-years, [sic] I need to know the plans to transform my community will not destroy it in the process. In the DEIR, I read that the developers are planning to excavate down about 45 feet, removing over 700,000 cubic yards of dirt. I kept reading to see if there was any more information about any of the potential impacts, yet there are just two pages failing to provide a meaningful analysis.

Response to Comment No. 323-1

Refer to Section I, Executive Summary, and Section VI, Other CEQA Considerations, of the Draft EIR, for summaries of the Project's impacts. Detailed analyses supporting these conclusions are provided throughout Section IV, Environmental Impact Analysis, of the Draft EIR. Specifically, impacts related to excavation are addressed in Sections IV.A, Air Quality, IV.B, Cultural Resources, IV.D, Geology and Soils, IV.E, Greenhouse Gas Emissions, IV.F, Hazards and Hazardous Materials, IV.I, Noise, and IV.L Tribal Cultural Resources, of the Draft EIR.

Comment No. 323-2

Excavating down nearly 45 feet will likely lead to the discovery of historic resources. Archaeological excavation takes patience, and discovering dinosaur bones or other artifacts may occur. How will the developers plan on excavating all of this dirt while not damaging the resources in the ground? If anything is found, who will the artifacts be given to? What will be the chain of custody for anything found? Will the project construction be stopped until the affected area is thoroughly examined by archeologists? These details are essential to protecting the Beverly Fairfax Historic District.

Response to Comment No. 323-2

Refer to Response to Comment Nos. 13-7 and 285-2 regarding the means by which archaeological and paleontological resources are assessed during the environmental review and addressed during Project implementation, including the ownership and disposition of any collected materials. Mitigation proposed for the Project includes plans that specify the process followed during the ground-disturbing activities for the Project.

CEQA requires that any discovered resources be evaluated for significance, which requires stopping construction to complete the evaluation.

Comment No. 323-3

Where will the dirt taken be disposed of and what research will be conducted to ensure that the dump site will not have any damage? I believe that it is important not only that the district's land will be okay but also that this does not raise environmental concerns for another area. On a more logistical note, what time of day will the excavation take place? And how many days per week? If the plan is agreed on, I will need to be waking up earlier in anticipation of the traffic so I am concerned that I could be spending a long time waking up to the digging.

Response to Comment No. 323-3

Contaminated soils will be disposed of at any of the many facilities available to accept impacted soils; any facility that accepts impacted soil must be permitted by the State of California and has specific soil disposal criteria to protect human health and the environment. While the chosen facility will be dependent on the facility capacity, soil acceptance criteria and projected volume, the Soil Management Plan (Appendix B of the Site Summary Report [Appendix G.1 of the Draft EIR]) noted the preferred disposal facility, which is Buttonwillow Landfill in Kern County.

Soil materials that are not contaminated would likely be disposed of at United Rock Products Landfill in Irwindale. As discussed in the Project's Initial Study (Appendix A of the Draft EIR), the landfills serving the County of Los Angeles have adequate capacity to serve the Project. Refer to pages 79 through 83 of the Initial Study for a discussion of solid waste. All soil would be disposed of in accordance with the requirements of the disposal facility and its operating permit, including requirements related to truck size, hours of disposal, and use of measures to control dust.

The Soil Management Plan provides information on soil testing procedures that will be used to develop the soil profile prior to off-site disposal. The hauling will take place within the hours approved by LADOT and the Bureau of Engineering, Monday through Friday, and occasionally Saturdays. Hauling activities would occur between the hours of 9:00 A.M. and 3:30 P.M. on weekdays, as well as between 8:00 A.M. and 4:00 P.M. on Saturdays with additional approvals from the Bureau of Engineering District Engineer. Hauling activities between 7:00 A.M. and 9:00 A.M. and 3:30 P.M. and 4:00 P.M. would require approval from the Bureau of Engineering District Engineer per LAMC Section 62.61.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 for a discussion of the overall construction schedule, the estimate of the construction trip generation, the approved haul routes, and hours of construction activities, including permitted hauling hours.

Comment No. 323-4

For years, tar preserved the bones of trapped animals at La Brea Tar Pit yet the developers are not considering that this excavation could unveil the bones of ancient animals. How far will the excavation site be from this landmark? If the developers plan on using massive excavators, how long are they planning on spending on excavation while looking for resources? These excavators can carry 19 to 24 tons—spotting an ancient bone would be like finding a needle in a haystack.

Response to Comment No. 323-4

This comment is identical to Comment No. 285-4. Refer to Response to Comment No. 285-4, above.

Comment No. 323-5

Until my concerns about Beverly Fairfax's historic and cultural resources are addressed, I will urge my neighbors to stand up against the project.

Response to Comment No. 323-5

This comment is identical to Comment No. 285-5. Refer to Response to Comment No. 285-5, above.

Comment Letter No. 324

Steven and Daniel Levenson
428 N. Sweetzer Ave.
Los Angeles, CA 90048-2604

Comment No. 324-1

Regarding the TVC 2050 expansion of the CBS studios, I would like you to address several concerns that I have.

Response to Comment No. 324-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 324-2 through 324-6.

Comment No. 324-2

Regarding traffic:

1. There will be a lot of car and truck traffic caused by this expansion. I think there needs to be turn lanes for traffic making right turns onto the project. Why aren't there going to be any dedicated turn lanes for trucks and cars? Were they considered? How is the problem of cars and trucks trying to make turns, darting across oncoming traffic going to be addressed?
2. Grove Drive is not a very large street. Why is the large parking garage going to be located on the Grove drive? Did you consider how many cars will have to drive on that street? Please explain the rationale for its use? Were alternative streets considered?
3. Grove Drive is also an access point for the Holocaust Museum with lots of school buses dropping kids off. How will the school buses be able to safely drop kids off with thousands of additional cars across the street? Will this be safe for school children? What measures are going to be taken so that safety remains a priority?

Response to Comment No. 324-2

Refer to Response to Comment No. 83-1 regarding turn lanes.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access to and use of The Grove Drive. The Grove Drive was selected as one of three major access driveways for the Project because The Grove Drive has substantially more available capacity than either Fairfax Avenue or Beverly Boulevard. Refer to Response to Comment No. 41-4 for a discussion of pedestrian safety to the Holocaust Museum.

Comment No. 324-3

Regarding zoning:

1. The DIER [sic] says that any use in the C2 zone will be allowed. What exactly is a C2 zone? From what I understand there are over 100 uses that could be allowed in the C2 zone. How will the community know what uses could [sic] are going to be proposed?

Response to Comment No. 324-3

As discussed on pages IV.H-8 to IV.H-9 and shown in Figure IV.H-2 in Section IV.H, Land Use and Planning, of the Draft EIR, the majority of the Project Site is currently zoned C2. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed therein, based on input received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project, including by deleting the reference to all C2 uses in the Draft EIR; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses (i.e., sound stage, production support, production office, general office, and retail) as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the Draft EIR.

Comment No. 324-4

How will the community be informed about when and if that happens?

Response to Comment No. 324-4

Public hearings and meetings will be held for the Project after the Final EIR is completed. All members of the public who provided a written comment in response to the Draft EIR, or who otherwise provides a written request to the City Planner assigned to the Project to be added to the Project's Interested Parties List, will receive notice for all public hearings and meetings. Refer to Response to Comment No. 32-3 regarding public noticing.

Comment No. 324-5

How are traffic impacts analyzed for the project for the variety of potential uses? Does that impacts analysis have to be done with potential uses are actual planned uses?

Response to Comment No. 324-5

Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the Draft EIR's CEQA transportation analysis. The proposed Specific Plan will limit the permitted land uses to those analyzed in the Draft EIR (i.e., sound stages, production support, production office, general office, and retail), and the transportation analysis accounts for all permitted land uses.

Comment No. 324-6

Regarding Vehicle Miles Traveled:

1. The analysis says the average travel distance is 3.5 miles. This does not make sense to me. Can you provide more details on how this number was reached and what it means?

Response to Comment No. 324-6

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment Letter No. 325

Devora Levin
360 N. Laurel Ave.
Los Angeles, CA 90048-2314

Comment No. 325-1

I am a resident for 45 years. I consider Television City is being considered for a mammoth development, and I have many concerns about what that project would mean for our community.

Response to Comment No. 325-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 325-2.

Comment No. 325-2

What does it mean that the site could be a Regional Center? A regional center that would do what? Are there other areas in the city that are also regional centers? Would the regional center be the same boundaries as the Television City site or expand beyond just that development?

Does that mean that other projects would fall under the category of the area being a regional center, not just the one for Television City? Would other projects then not have to go through a thorough review? Would they just get approved or be allowed because they are part of some regional center area?

Response to Comment No. 325-2

This comment is identical to a portion of Comment No. 80-2. Refer to Response to Comment No. 80-2, above.

Comment No. 325-3

I strongly urge you to oppose this development

Response to Comment No. 325-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 326

Tiffanie Levine
410 N. Alta Vista Blvd.
Los Angeles, CA 90036-2541

Comment No. 326-1

I am concerned that the project description for the proposed TVC project. I am a 20 year resident and I do not think the area can take any more cars.

Response to Comment No. 326-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 326-2 through 326-6.

Comment No. 326-2

Every [sic] Beverly is packed from the Beverly Center to Hancock Park from 1 to 8 every day.

Response to Comment No. 326-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 326-3

What is actually going to be built? What parts of the plan are considered conceptual? How can a project be considered for approval when the area that will be most affected cannot be told exactly what is going to be put on the site?

Response to Comment No. 326-3

This comment is identical to the first paragraph of Comment No. 97-2. Refer to Response to Comment No. 97-2, above.

Comment No. 326-4

It seems like the developer is working on every option available to them under City law. What is the actual plan? Why can't the developer tell the community exactly what will be built?

Response to Comment No. 326-4

This comment is substantively similar to the second paragraph of Comment No. 97-2. Refer to Response to Comment No. 97-2 regarding the Project Description and proposed Specific Plan.

Comment No. 326-5

Did you study the impact of the warehouses, facilities, theaters, offices, conferences, etc.? The first things built, it would seem, would have a longer period of time for any impacts to be experienced, correct?

Response to Comment No. 326-5

This comment is identical to a portion of Comment No. 97-3. Refer to Response to Comment No. 97-3, above.

Comment No. 326-6

Should the parking be doubled and built first?

Response to Comment No. 326-6

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 326-7

Please respond and I am against this development program until I can understand project and its impacts. I appreciate the transparency.

Response to Comment No. 326-7

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 326-2 through 326-6, above.

Comment Letter No. 327

Harriet Levins
412 N. Orlando Ave.
Los Angeles, CA 90048-2518

Comment No. 327-1

The project is proposing to stage thousands of trucks next to Loyola High School, the recreation center and Kaiser Hospital—sites that the City should be making a high priority for health considerations. This seems inappropriate to stick thousands of trucks in these communities.

Have the hospital, school and residents been told that there may be 60,000 trucks idling and driving through their communities?? The area by Loyola in particular is a lower income community—why are trucks for your project being pushed into that community?

Please provide an analysis of all of the possible impacts on these communities, including environmental justice issues. There should also be a health risk analysis on the impacts to these communities.

Response to Comment No. 327-1

All haul truck staging locations will be provided onsite, so no haul trucks will be idling offsite. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

An analysis of environmental justice is not required under CEQA. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the findings of the Draft EIR.

Comment Letter No. 328

Rosalind Levitt
122 S. Laurel Ave.
Los Angeles, CA 90048-3514

Comment No. 328-1

I am writing this letter to state my opposition to the proposed television City project. The lack of transparency around this project by both the city and applicant is concerning, and I have serious concerns about the impacts this project will have on our neighborhood; I do not agree that the claim of economic benefits outweigh all of the negative impacts this will have in my neighborhood and to the community.

Response to Comment No. 328-1

This comment is identical to Comment No. 321-1. Refer to Response to Comment No. 321-1, above.

Comment No. 328-2

The community was not given the specific plan for this site and it is unclear if and when the city ever got a hold of the specific plan. How can you as elected officials render judgment on this project without that information? The alternative possibility is that the city had the specific plan and chose not to share it, which raises even more questions.

Response to Comment No. 328-2

This comment is identical to Comment No. 321-2. Refer to Response to Comment No. 321-2, above.

Comment No. 328-3

Even without the specific plan, the reported facts are extremely concerning.

Response to Comment No. 328-3

This comment is identical to Comment No. 321-3. Refer to Response to Comment No. 321-3, above.

Comment No. 328-4

Tens of thousands of trucks trips?

Response to Comment No. 328-4

This comment is identical to Comment No. 321-4. Refer to Response to Comment No. 321-4, above.

Comment No. 328-5

20 years of construction?

Response to Comment No. 328-5

This comment is identical to Comment No. 321-5. Refer to Response to Comment No. 321-5, above.

Comment No. 328-6

The city needs to make clear all of the specific impacts this will have to the quality of life in Beverly Fairfax neighborhood and what is going to be done about those impacts? Residents should not be forced to accept and live with a project that has “unavoidable impacts”. [sic]

Response to Comment No. 328-6

This comment is identical to Comment No. 321-6. Refer to Response to Comment No. 321-6, above.

Comment No. 328-7

- How will our air quality be affected by construction and truck dust?

Response to Comment No. 328-7

This comment is identical to Comment No. 321-7. Refer to Response to Comment No. 321-7, above.

Comment No. 328-8

- How long will our commutes increase?
- How will 8,000 employees turning in and out of this site affect our traffic patterns?
- How will the city increase safety measures for pedestrians with all of these new trucks and commuters?

Response to Comment No. 328-8

This comment is identical to Comment No. 321-8. Refer to Response to Comment No. 321-8, above.

Comment No. 328-9

None of the above questions have been answered. I ask that until they are, this project not be allowed to move forward.

Response to Comment No. 328-9

This comment is identical to Comment No. 321-9. Refer to Response to Comment No. 321-9, above.

Comment Letter No. 329

L. Lewin
506 N. Fuller Ave.
Los Angeles, CA 90036-1941

Comment No. 329-1

I have been a resident in this area for 40 years. I hope you will seriously reconsider the proposed Television City expansion project. The EIR is confusing and incomplete. There are so many concerns with this proposed huge facility for a neighborhood that is historic. Please address these issues not explained in the EIR.

Response to Comment No. 329-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 329-2 through 329-7.

Comment No. 329-2

The Television City proposes improvements that will increase the height of some buildings by many stories. How will 20-story buildings appear behind our Farmer's Market and the Avila Adobe? The adobe has historical significance and has been around since 1818. How will the developer protect it from damage during all the construction? How close will the construction be to the edges of the adobe and market property?

Response to Comment No. 329-2

This comment is identical to a portion of Comment No. 209-2. Refer to Response to Comment No. 209-2, above.

Comment No. 329-3

How will the increased traffic impact business at the Farmer's Market?

Response to Comment No. 329-3

This comment is identical to a portion of Comment No. 209-2. Refer to Response to Comment No. 209-2, above.

Comment No. 329-4

Also, it seems those tall buildings even fit into the neighborhood, was this even considered? The drawings show a mammoth sized complex. How could that kind of development fit into our community? What will happen to any views that residents in apartments have now?

Response to Comment No. 329-4

This comment is identical to Comment No. 209-3. Refer to Response to Comment No. 209-3, above.

Comment No. 329-5

With construction, residents need to know the schedule. How is the project construction going to be mapped out? Neighbors need to know the phases of the project, so please provide a plan. During construction there will be so many trucks, coming and going. Why is the route for this traffic pattern not confirmed already?

Response to Comment No. 329-5

This comment is identical to Comment No. 209-4. Refer to Response to Comment No. 209-4, above.

Comment No. 329-6

Has the developer partnered with the LA Conservancy in this development? It seems there has been a settlement of some kind. What is this settlement, and is it included in the EIR? Why does the LA Conservancy speak for our community? How does the settlement agreement affect the goals of the expansion project? How can the community know the limitations agreed to if it is not available to the public?

Response to Comment No. 329-6

This comment is identical to Comment No. 209-6. Refer to Response to Comment No. 209-6, above.

Comment No. 329-7

In the EIR, the Vehicle Miles Travelled analysis is difficult to understand. Please explain what vehicle miles travelled is and why is that used rather than number of cars and number of trips. The distance people drive in LA is greater than the averages you used; when are you going to correct those mileage numbers? The information does not seem to align with

what are the typical transportation modes of Angelenos. For example, the VMT analysis makes assumptions about people traveling via public transportation, but most people's experience says otherwise. What data was used to create the analysis.

Response to Comment No. 329-7

This comment is identical to Comment No. 209-7. Please see Response to Comment No. 209-7, above.

Comment No. 329-8

Thank you for your time.

Response to Comment No. 329-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 330

Stephanie Lewis
8328 W. Fourth St.
Los Angeles, CA 90048-4203

Comment No. 330-1

Today we have before us the TVC 2050 project. On the surface, this development may seem harmless—it is a modernization with maybe even some merit. My problem with this major expansion of Television City is with the thoroughness of the application and process of informing the community about the project.

Response to Comment No. 330-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 330-2 through 330-6. Refer to Response to Comment No. 32-3 regarding noticing of the Project in compliance with CEQA.

Comment No. 330-2

I'm not a professional, but I know that for projects like these, different studies are to be done to determine that the project does not create risk in the areas of the environment, traffic, flooding, and in [sic] long term after its [sic] completed. How is a non-technical person supposed to be able to understand all of the information and analysis?

Response to Comment No. 330-2

The Draft EIR and its technical appendices were prepared in accordance with the requirements of CEQA. The Draft EIR was written to be as accessible to the general public as possible. Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

Comment No. 330-3

As a resident of this community, how can this process have been done in an almost behind-closed-doors manner? I understand that the only public meeting held so far about this project was more than a year ago, in July 2021, and that the environmental impact report was not even done at that time. If public workshops or community meetings are not held for the public to be able to ask questions and really understand what impact a project

is going to have, then are we just supposed to trust as accurate and true if the applicant states what the impacts are or says there are no impacts?

Response to Comment No. 330-3

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 330-4

If the applicant really cared about the community, then he wouldn't merely comply with the minimum requirements of state or local law—there is nothing stopping the developer from holding meetings in the community if he really wanted to work with residents and businesses. Also, why isn't a public hearing going to be held? I know this is regularly done after an environmental impact report is drafted and goes out for a comment period. Even if it is not required, the applicant and the city could definitely conduct one. It does not serve the applicant well if he is unwilling to face public scrutiny.

Response to Comment No. 330-4

Refer to Response to Comment No. 32-3 regarding future public hearings and meetings.

Comment No. 330-5

So where are the long-term impact answers? Is the developer trying to say that there will be no major impacts, including a huge increase in traffic and congestion during the building of this project? That just cannot be true.

Response to Comment No. 330-5

This comment incorrectly claims no significant impacts were identified in the Draft EIR. Refer to Section I, Executive Summary, and Section VI, Other CEQA Considerations, of the Draft EIR, for summaries of the Project's impacts.

Section IV.K, Transportation, of the Draft EIR comprehensively evaluated the potential transportation impacts of the Project and concluded that impacts would be less than significant. Regarding traffic and congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 330-6

One thing I found was inconsistent. I read something about construction being limited to times when the streets aren't busy. When exactly is that? But then I saw construction would be Monday through Friday 7:00 AM to 9:00 PM and Saturday 8:00 AM to 6:00 PM. So which is it? If Monday through Saturday construction is going to be permitted, then they should've simply stated basically ALL DAY EVERY DAY. How could that not be a serious impact on the already traffic filled streets and gridlock of that area all day every day?

Response to Comment No. 330-6

As stated on pages II-33 to II-34 in Section II, Project Description, of the Draft EIR, in accordance with LAMC requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays, or outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners. However, the CTMP prepared pursuant to Project Design Feature TR-PDF-1 does include a provision to schedule construction-related activities to reduce the effect on the surrounding roadways. Refer to pages IV.K-36 and IV.K-37 of the Draft EIR.

As discussed in Section IV.K, Transportation, of the Draft EIR, transportation impacts were comprehensively analyzed and determined to be less than significant during construction of the Project. Refer to Topical Response No. 12, Safety and Congestion. As discussed therein, congestion and driver delay are not CEQA impacts.

Comment No. 330-7

The plan and the process have not been thought through completely to the end.

Response to Comment No. 330-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 330-2 through 330-6.

Comment Letter No. 331

Gary Li
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 331-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 331-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 332

Theresa Li
327 N. Kilkea Dr.
Los Angeles, CA 90048-2226

Comment No. 332-1

I care deeply about economic justice, and I do not think the developers of this project have done enough to address this issue. It seems like a lot of rich guys came up with this without really considering how it would impact residents, particularly lower-income communities of color.

Response to Comment No. 332-1

This comment is substantially similar to Comment No. 40-1. Please refer to Response to Comment No. 40-1, above.

Comment No. 332-2

Why isn't there affordable housing with this project? We have a massive housing shortage in Los Angeles. The idea that you can just dump a project of this size on our community without housing seems ridiculous. How many new residents are projected to move into the Beverly Fairfax area and into the surrounding communities to be closer to their jobs? Is that info in the EIR? Where will those new residents live?

Response to Comment No. 332-2

This comment is identical to a portion of Comment No. 40-2. Refer to Response to Comment No. 40-2, above.

Comment No. 332-3

There are tons of renters near CBS Television City. Will their rents go up? How much? Why not include workforce housing in the draft EIR? Imagine how much lower the impact of this project would be on the local community if they had less office space and more housing.

Response to Comment No. 332-3

This comment is identical to a portion of Comment No. 40-2. Refer to Response to Comment No. 40-2, above.

Comment No. 332-4

And for that matter, what will the impact be on our local family-run businesses? Will their landlords raise their rents and run them out in favor of high-end stores?

Where have these possible consequences been identified and studied? If they haven't been yet, when are those studies going to be done?

Response to Comment No. 332-4

Refer to Response to Comment No. 332-3. This comment discusses non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 332-5

The EIR says there will be thousands of trucks staged near Loyola High School. Thousands. Idling trucks spewing pollution near teenagers with developing brains. Why will those trucks be in that community? What regulations would allow that to happen? There are lots of people living there that don't make a lot of money. Has anyone looked at the environmental justice issues? Is that in the EIR? Where is the information about the impacts on people's health, not only from the trucks staged near the school but from all the truck traffic that will be coming?

Response to Comment No. 332-5

Please see Response to Comment No. 26-24 for a discussion of haul truck staging areas. As discussed therein, all haul truck staging would occur on-site per LADOT's recommendation letter dated June 30, 2022.¹⁵⁵ The two off-site staging locations described and evaluated in the Draft EIR are no longer proposed. As such, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. The removal of the staging locations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment No. 26-E.1-21 for a discussion of the Draft EIR's analysis of localized air quality impacts. Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA was

¹⁵⁵ Refer to Appendix M.5 of the Draft EIR for the LADOT approval letter.

completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the findings of the Draft EIR.

An analysis of environmental justice is not required under CEQA. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 332-6

Is the city really thinking of permitting a billionaire developer to dump its pollution on the poor in order to make a few bucks? This should not go forward until health risks are studied at the very least and alternatives are seriously considered.

Response to Comment No. 332-6

Refer to Response to Comment No. 332-5 for a discussion of air quality and health concerns.

As required by CEQA, the Draft EIR analyzed a full range of alternatives. Refer to Section V, Alternatives, of the Draft EIR and Topical Response No. 16, Project Alternatives Analysis, for a discussion of alternatives considered in the Draft EIR.

Comment Letter No. 333

Nathan Licht
556 N. Croft Avenue, Apt. 3
West Hollywood, CA 90048-2542

Comment No. 333-1

Because the EIR doesn't include housing, it seems likely that huge numbers of people will be driving into to our community every day to work and visit the site. Where are they going to park? Clearly 5,300 parking spots in the plan will be insufficient because the plan refers to "offsite parking", [sic] which sounds like we should expect thousands of cars to be driving around our streets every single day looking for parking.

Response to Comment No. 333-1

Refer to Topical Response No. 13, Parking, regarding the adequacy of the onsite parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Off-site parking is not needed to meet the Project's peak parking demands, and, therefore, no such parking is proposed. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the offsite parking agreement language was deleted from the Draft EIR.

Comment No. 333-2

If it's true that cars [sic] be allowed to park anywhere in our neighborhood, there should be a study of the impacts of all this traffic, like air pollution, crime and car-break in [sic] incidents, constant noise, where pedestrian crosswalks will be installed, if they will have flashing lights and other protections for people with disabilities, kids walking to school, religious people walking to services.

Response to Comment No. 333-2

Refer to Topical Response No. 13, Parking, regarding how the on-site parking supply would be sufficient to serve the full parking demand of the Project. As such, no off-site spillover parking is anticipated to occur. Also refer to Sections C, Traffic Safety vs. Congestion, and E, Pedestrian Safety at Project Driveways, of Topical Response No. 12, Safety and Congestion, regarding pedestrian safety.

Comment Letter No. 334

Ty Linegar
335 1/2 N. Gardener St.
Los Angeles, CA 90036-5706

Comment No. 334-1

I don't think that the traffic section of the Draft EIR is complete. Unless I'm reading it wrong, many different uses listed in the Draft EIR aren't accounted for in the traffic section, such as trips to/from warehouses, the theaters, educational facilities and conference facilities. Is there a supplemental study for this additional traffic?

Response to Comment No. 334-1

Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the Draft EIR's transportation analysis. The proposed Specific Plan will limit the permitted land uses to those analyzed in the Draft EIR (i.e., sound stage, production support, production office, general office, and retail), and the transportation analysis accounts for all permitted land uses.

Refer to Topical Response No. 3, Permitted On-Site Uses. As discussed therein, uses allowed within the Project Site must be consistent with the five permitted land uses (i.e., sound stage, production support, production office, general office, and retail) and the ancillary sitewide uses that support the studio and the five permitted land uses. These uses are fully accounted for in the impact analyses in the EIR.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, a supplemental study is not required.

Comment No. 334-2

If the developer wants public support for this 20-year construction project, it needs to be totally transparent about what we should expect. We know that traffic will be much worse, but burying the true impact of traffic and related issues, like parking and air quality, is unfair to the community and will lead to widespread opposition to the project.

Response to Comment No. 334-2

The intent of the Draft EIR, which is publicly available on the Department of City Planning's website (<https://planning.lacity.org/development-services/eir/tvc-2050-project-0>), is to provide a thorough, transparent analysis of the likely impacts of the Project on the environment. The preferred construction of the Project by the Applicant is to build the Project in one phase, which would take approximately 32 months to complete and represents the worst-case condition from a traffic standpoint. To be comprehensive, the Draft EIR analyzed both a 32-month schedule and a long-term buildout schedule. Refer to Response to Comment No. 9-24 regarding the construction timeline.

Under SB 743, traffic congestion and the adequacy of a new development's parking are not CEQA considerations. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Air quality analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, of the Draft EIR. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operational emissions. All other air quality impacts would be less than significant or less than significant with mitigation. It should be noted that all significant and unavoidable impacts associated with the Project would be temporary and cease when construction is complete. No significant and unavoidable impacts associated with Project operation were identified. Refer also to Response to Comment No. 26-E.1-15 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts associated with air emissions would be less than significant.

Comment Letter No. 335

Robin Lippin
445 N. Orlando Ave.
Los Angeles, CA 90048-2517

Comment No. 335-1

I ask that you take a closer look at the impact on air quality that the new studio at Television City would create if constructed. The air with breath around Los Angeles is already intoxicating and if there is a significant increase in carbon and pollutants from the traffic and construction of the project, we could be in for even more hazardous air.

Does the air quality analysis show that there could be 50, 100 or 200 production trucks spewing diesel particulates in the community for years to come? What exactly will be emitted? During what hours and over how many days? What about the greenhouse gas emissions from all these trucks? What are the specific effects expected from each of the types of particulate matter?

Response to Comment No. 335-1

The Draft EIR comprehensively analyzed the Project's potential air quality impacts in Section IV.A, Air Quality, in accordance with CEQA. As stated on page 11 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR and discussed in Response to Comment No. 26-E.1-16, the vehicle fleet mix used in the Project's air quality and GHG analyses were based on the Los Angeles County vehicle fleet mix (which includes trucks) from EMFAC2017, the version of EMFAC incorporated into the current version of CalEEMod at the time of Draft EIR publication. Heavy-duty vehicles associated with production trucks were included in the air quality and GHG analyses provided in the Draft EIR. Please refer to Table IV.E-11 (Annual Project (Conceptual Land Use Program) GHG Emissions Summary (2026 Buildout Year)) in the Draft EIR. GHG emissions associated with mobile sources, including production trucks, is included in the table under "mobile sources."

Please refer to Response to Comment No. 87-1 regarding emissions related to production trucks and Response to Comment No. 26-E.1-16 regarding the number of Project-related operational trucks accessing the Project Site per day and typical hours of use.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project

would be below the applicable significance thresholds and impacts would be less than significant. The HRA provides the emissions from the operational trucks.

As stated on page IV.A-6 of the Draft EIR, the primary effects of particulate matter exposure include potential aggravation of existing heart and lung diseases, affecting the body's defenses against inhaled materials, and lung tissue damage.

Comment No. 335-2

What can the developer possibly do to mitigate the health impacts of the worsening air quality due to this project? Other than not allowing the size, the amount of expected people, the volume of cars and trucks? Will the developer reduce the scale and density of what is being planned given the already poor air quality in Los Angeles?

Response to Comment No. 335-2

The Draft EIR comprehensively analyzed the Project's potential air quality impacts in Section IV.A, Air Quality, and determined that implementation of the mitigation measures listed on pages IV.A-65 to IV.A-66 of the Draft EIR would reduce localized impacts to less-than-significant levels.

Comment No. 335-3

Also, I ask you consider the health risks to children and senior from all the trucks that will be entering Grove Dr and emitting diesel exhaust next to a park—where is the breakdown of the emissions just due to those trips in that location? Why is the large parking structure being placed on Grove Drive, which is a small street, and right across from Pan Pacific Park? Think of the children that will have to breath dirty air from the pollution from all these trucks.

Response to Comment No. 335-3

The Draft EIR analyzed localized air quality impacts using the SCAQMD LST methodology which is based on the distance from the property boundary to the sensitive receptor. The localized air quality analysis in the Draft EIR took into account sensitive receptors located adjacent to the property boundary (residential uses to the east) and concluded that impacts at this receptor would be below SCAQMD significance thresholds. As discussed in Section IV.A, Air Quality, of the Draft EIR, all other air quality sensitive uses located at greater distances from the Project Site would experience lower air quality impacts. As the Pan Pacific Park is located farther away from the Project Site than the adjacent residential uses, localized air quality impacts at the Park receptor would be lower than those presented in the Draft EIR. Therefore, localized impacts to Pan Pacific Park, even if considered hypothetically as a sensitive receptor, would be less than significant.

As discussed above in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA includes health risk impacts from both Project-related construction and operational activities and from all Project-related sources, including diesel exhaust trucks and vehicles accessing the parking structures. A specific breakdown of the operational emissions directly next to the park is not available since the total amount of on-site truck travel and idling emissions is calculated for the entire length of the travel distance and modeled as a line source along the travel path. The calculation of these emissions is provided in Appendix FEIR-10. The HRA confirms the findings of the Draft EIR (see page IV.A-69 of the Draft EIR) that health risks from the Project would be less than significant, including at the receptor described in this comment, and no further mitigation for the purposes of human health risks is necessary. Refer to Response to Comment No. 26-E.1-13 for a detailed response regarding potential localized impacts at Pan Pacific Park if hypothetically treated as a sensitive receptor.

Comment No. 335-4

As both a resident and concerned citizen, I humbly ask for you to consider these risks and pass these questions to the developer.

Response to Comment No. 335-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 335-1 through 335-3.

Comment Letter No. 336

Jesse Lira
105 N. Kilkea Dr.
Los Angeles, CA 90048-3523

Comment No. 336-1

The Draft EIR should analyze the air quality, noise and other issues impacting all the sensitive uses along Fairfax. There are many schools, nursing homes and residential uses that will be impacted.

Response to Comment No. 336-1

The first sentence of this comment is identical to the second sentence in Comment No. 49-2. Refer to Response to Comment No. 49-2, above.

Refer to Response to Comment Nos. 26-26 and 35-46 for detailed discussions of air quality impacts at sensitive receptors. As discussed in Section IV.A, Air Quality, of the Draft EIR, localized air quality impacts would be less than significant.

The Draft EIR comprehensively analyzed the potential noise impacts during construction and operation to sensitive receptors along Fairfax Avenue in Section IV.I, Noise, of the Draft EIR (see Table IV.I-10 and Table IV.I-11 regarding construction noise impacts and Table IV.I-12 through Table IV.I-18 regarding operational noise impacts).

Comment No. 336-2

The project is proposing to stage thousands of trucks next to Loyola High School and Kaiser Hospital.

Response to Comment No. 336-2

All haul truck staging locations would be provided onsite. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 336-3

Have these residents been told that there may be 60,000 trucks idling and driving through their streets? Has anyone been notified about the incredible impacts that tens of thousands of trucks will have on their daily lives?

Response to Comment No. 336-3

Refer to Response to Comment No. 336-2 regarding idling.

Noticing for the Project has been conducted in accordance with CEQA. Refer to Response to Comment No. 32-3.

There will not be thousands of trucks driving through residential streets. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips and haul routes. Refer to Topical Response No. 10, Trip Generation, regarding the truck and automobile trip generation estimates during Project operation.

Comment No. 336-4

Air quality is also an issue—the area by Loyola in particular is a lower income community.

Response to Comment No. 336-4

An analysis of environmental justice is not required under CEQA. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please note that all construction haul truck staging would occur on-site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 336-5

Why are you putting trucks for your project in that community?

Response to Comment No. 336-5

Refer to Response to Comment Nos. 336-2 and 336-3. All haul truck staging locations would be provided onsite; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 336-6

Please provide an analysis of all of the possible impacts on these communities, including environmental justice issues. Please provide a health risk analysis on the impacts to these communities.

Response to Comment No. 336-6

Analysis of environmental justice is not required under CEQA and the Project is not within a disadvantaged or environmental justice community per SB 535 or AB 1550. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 327-1 regarding air quality health risks.

Comment Letter No. 337

Lise Ville
449 N. Orlando Ave.
Los Angeles, CA 90048-2517

Comment No. 337-1

I am deeply concerned about the Television City 2050 project and what it will mean for my neighborhood. The size and scope of the project in general could be problematic for those of us who live near Television City. There are some specific concerns I would like to share:

Response to Comment No. 337-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 337-2 through 337-8.

Comment No. 337-2

- The C2 Zoning appears to have has dozens, maybe hundreds, of possible uses. How many uses fall into that zoning category? Some of those uses could cause real harm to our community and others would bring up even more questions! Where is the analysis of how each possible use of the property would impact the surrounding community? Does the plan include the use of space as auditoriums? How many would each auditorium that is included be able to hold? If even one auditorium would seat 3,000, that would be a lot of additional visitors and additional cars in our neighborhood. Would more than one auditorium at a time be used, potentially with 3,000 attendees each, is that right?

Response to Comment No. 337-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan and Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed in therein, based on comments received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project and the reference to all C2 uses has been removed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses—sound stage, production support, production office, general office, and retail—as well as related ancillary and supportive uses, all of which

were fully disclosed and analyzed in the EIR. As discussed in Response to Comment No. 5-6, an auditorium open to the general public would not be permitted within the Project Site.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding audience trips, which were accounted for in the impact analyses in the Draft EIR.

Comment No. 337-3

Where would all the attendees park?

Response to Comment No. 337-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. All Project parking would be accommodated on-site. Refer to Topical Response No. 13, Parking, regarding the adequacy of the parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 337-4

What about traffic controls that would be required while that may visitors come to a show? What days of the week and what hours would that situation occur?

Response to Comment No. 337-4

The Project would still accommodate audience shows as is done under existing conditions on the Project Site. The level of audience shows would increase as a result of the Project, which has already been taken into account in the analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Audience members coming to a show taping would be directed to a specific Project Site entrance and then they would be directed to parking from that entrance. Additional parking personnel may be required inside of the Project Site to get the audience members to the designated parking area for that show, but no special traffic personnel or traffic controls would be needed on the public street system.

The audience shows that now take place on the Project Site occur during the weekday daytime and evening hours and on weekend evenings. That pattern of activity is expected to continue. Refer also to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, and Topical Response No. 12, Safety and Congestion.

Comment No. 337-5

- From the plan it seems that there will be 8000 employees at the site and as many as 5000 (or more?) additional visitors daily, yet the site will only have around 5000 parking spots, so where are all of these people going to park? What steps are going to be taken to make sure that residents are able to park where we live?

Response to Comment No. 337-5

Refer to Response to Comment No. 337-3 regarding parking.

The comment regarding the number of audience visitors is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation.

Comment No. 337-6

Also, so many additional people on our streets who don't live here might lead to other problems. What is the plan for security on site? Will it be 24/7? Will security also be monitoring outside the property, like on the sidewalks when people are leaving if they have attended one of the shows? What steps are going to be taken to make sure that the neighborhood remains safe with all of the additional traffic and additional people?

Response to Comment No. 337-6

Refer to Topical Response No. 13, Parking, regarding how the on-site parking supply would be sufficient to serve the full parking demand of the Project and prevent spillover parking. As such, the Project would not result in a substantial number of additional people utilizing sidewalks.

In addition, as discussed in detail on pages IV.J.2-12 and IV.J.2-13 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project includes a number of security features including security cameras and 24-hour security personnel that would monitor the Project Site on a 24-hour basis. With regard to special events, refer to Topical Response No. 3, Permitted On-Site Uses, regarding how special events would continue to be governed by the LAMC, consistent with existing conditions. With regard to audiences, as discussed in Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, audience members would represent a small fraction of the on-site population with an average of approximately 427 audience members on a weekday. These audience members would park on-site, would enter the Project Site through a security gate and would be monitored by on-site security staff. As such, audiences would not be a source of crime.

Comment No. 337-7

- The farmer's market is a very important part of our community. What analysis has been done to see how this will impact the farmer's market? Please describe what your evaluation has found will be the impacts to that amenity? Losing the farmer's market would be a major blow to the city and this area in particular. Clearly the project will make the area more congested with the additional cars and traffic, making it more difficult to get to the farmer's market and to park there. So what plans are in place to make sure that there are no impacts to the farmer's market, and our ability to enjoy it?

Response to Comment No. 337-7

Contrary to the assertion in this comment, The Original Farmers Market will not be lost due to the Project. For information regarding the Draft EIR's analysis of impacts to The Original Farmers Market, which is a historical resource, refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13 and 363-1.

While the Draft EIR's transportation analysis makes clear that a potential result of the Project, which would include an NTMP and would not result in significant transportation impacts under CEQA, is more vehicle trips in the Project Site vicinity, no evidence has been identified to suggest that a potential increase of vehicle trips will result in the demolition or material alteration of the physical characteristics of The Original Farmers Market that convey its historic significance and that justify its inclusion in, or eligibility for, listing as a historical resource as defined by CEQA. Therefore, a potential increase in vehicle trips would not result in significant impacts to The Original Farmers Market.

In addition, construction and operation of the Project would not affect physical access to The Original Farmers Market. Furthermore, as discussed in Topical Response No. 13, Parking, the Project would not result in spillover parking and as such would not affect parking at The Original Farmers Market.

Comment No. 337-8

- Between all the construction and additional cars and people, this area is going to be a much noisier and chaotic place. This is particularly a concern the later it gets into the night. With so many new sound stages that will be having audiences, how late will they be able to do that? What did the noise study state about noise levels and measures to make sure our neighborhoods will not be impacted during both construction and when the studios and stages are operating?

Response to Comment No. 337-8

Noise impacts during construction are fully analyzed in the Draft EIR. Refer to pages IV.I-35 through IV.I-43 therein.

Noise associated with outdoor production activities was analyzed in Section IV.I, Noise, of the Draft EIR. Refer to pages IV.I-44 and IV.I-45 and to Response to Comment No. 26-146. As demonstrated therein, potential impacts associated with operation of the Project would be less than significant.

As discussed in Response to Comment No. 26-141, the operational transportation noise analysis in the Draft EIR accounted for audience trips. Refer to Response to Comment No. 78-3 regarding the timing of evening audience shows.

Comment No. 337-9

This whole thing feels poorly thought out to me and I hope the city is going to take steps to make sure it isn't a disaster. It is very concerning that such a major project could happen, completely changing this place where I live.

Please consider stopping it, and if that is impossible doing all you can to make sure that this area is not negatively impacted. Thank you.

Response to Comment No. 337-9

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 337-2 through 337-8.

Comment Letter No. 338

Christopher Lord
27748 Summer Grove Pl.
Santa Clarita, CA 91354-1895

Comment No. 338-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 338-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 339

Joan Lounsbery
348 Hauser Blvd., #1-215
Los Angeles, CA 90036-3276

Comment No. 339-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 339-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 340

Jillian Lovell
536 N. Sweetzer Ave.
Los Angeles, CA 90048-2652

Comment No. 340-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 340-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 341

Bennett Barba Low
414 N. La Jolla Ave.
Los Angeles, CA 90048-2233

Comment No. 341-1

I am writing to comment on the CBS Television City expansion. As a 50 year resident of the neighborhood, I have seen a lot of change. This one is the largest and most serious to date.

Response to Comment No. 341-1

This introductory comment is identical to Comment No. 86-1, but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 341-2

I would love to provide feedback on the project, but the draft EIR says the plan is still conceptual and the applicant would be given flexibility. My understanding is this is why the applicant is asking for a 20-year development agreement. I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

Response to Comment No. 341-2

This comment is identical to the first paragraph in Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment No. 341-3

The proposal only has 5,300 parking spaces. This facility will be staffed by 8,000 employees and will also bring with it and thousands of audience members as well, where will the overflow parking be and has that even been studied?

Response to Comment No. 341-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and

prevent spillover parking. As discussed therein, the Project no longer proposes offsite parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

The comment regarding the number of audience members is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation.

Comment No. 341-4

This project is projected to need 60,000 truck trips to complete its construction. The city does not lay out if it has studied how the proposed staging area for these trucks will affect Loyola High school, Kaiser hospital, the Holocaust Museum, or the historic cemetery. I would ask that each of these important community assets be studied individually so that we can clearly see how the community will be changed.

Response to Comment No. 341-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction truck trips.

All haul truck staging locations would be provided onsite, and, as such, no haul trucks would be idling offsite. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 341-5

When will the community be allowed to give public input and weigh in on the actual design, not a plan that says things like the company “may make improvements” or could be two decades of construction?

How much further will the project progress before we are provided the detailed information we deserve?

Response to Comment No. 341-5

This comment is identical to the second and third paragraphs in Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment Letter No. 342

Ginny Lubbin
7370 Rosewood Ave.
Los Angeles, CA 90036-1918

Comment No. 342-1

First I want to say how grateful I am and have been for all your help and work over the years of your term. You have been the Councilman our district has had and I can say that with experience!

Response to Comment No. 342-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 342-2

I am hoping that you feel the TVC 2050 is way to [sic] big for our community. It is!!!!

The size, traffic and impact of construction to our neighborhood life would be catastrophic.

Response to Comment No. 342-2

Refer to Response to Comment No. 11-3 regarding the size of the project. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment. Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the Project's construction traffic impacts.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 342-3

I think the most frightening part of the tremendous scope of the project will be the extensive dirt and ground water removal. Trucking out acres of dirt and pumping out hundreds of cubic feet of water will destroy that geological table. Perhaps they could scale down the need to excavate by cancelling the need to have an underground delivery center.

Response to Comment No. 342-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the Project's construction traffic impacts, including impacts from haul trucks.

Refer to Response to Comment No. 11-5 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts. Further, as discussed in Response to Comment Nos. 3-7 and 11-25, dewatering would be limited to temporary dewatering during construction, and there will be no long-term impact on the water table in the vicinity of the Project due to dewatering.

The Project does not include an underground delivery center, as incorrectly stated in this comment.

Comment No. 342-4

In addition their proposed use of Grove Drive for both construction and the final delivery center is not workable.

Currently Grove Drive has daily south bound one lane blockages for Erewhon grocery, the Grove loading dock and valet parking. When construction begins and the addition to the Holocaust museum takes place this also effect traffic. Then add TVC construction and final daily deliveries and workers of 5000—truly I cannot imagine what my life living here will be like.

Response to Comment No. 342-4

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access and use of The Grove Drive. Refer to Topical Response No. 10, Trip Generation.

The primary access points for construction would be from Beverly Boulevard and Fairfax Avenue. The existing blockages along The Grove Drive are caused by the Erewhon market and the Broadcast Center Apartments valet parking and not related to the Project.

Comment No. 342-5

I have lived in this area for 40 years. I can tell you I cannot handle anymore traffic or pollution! When is enough enough?

Thank you for taking your time to listen to my concerns and your continued help in keeping yours and my neighborhood a great place to be.

Response to Comment No. 342-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 342-2 through 342-4.

Comment Letter No. 343

Norma Luna
118 S. Hayworth Ave., Apt. 1
Los Angeles, CA 90048-3672

Comment No. 343-1

As a 20 year resident of this area, I am very concerned about the amount of traffic this project will bring.

Response to Comment No. 343-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please note that under SB 743, traffic congestion is not a CEQA impact; refer to Topical Response No. 12, Safety and Congestion. Specific issues raised by the commenter are addressed in Response to Comment Nos. 343-2 and 343-3.

Comment No. 343-2

I cannot find clear information as to the number of trucks needed to access the TVC project to build this project. We know that the project has to excavate over 700,000 cubic yards of dirt. Depending on truck size that is anywhere from 50,000 to 70,000 diesel dump trucks. Then there are tens of thousands of trucks to bring concrete to the site. A typical concrete truck carries about 8 to 10 cubic yards. How many cubic yards of concrete will this project take to build the parking structures, foundations and other concrete structures?? How many trucks to deliver the rebar, steel, decking, sheet rock, glass, exterior walls, and HVAC, plumbing and electrical equipment will be needed?? How big are some of these trucks??

Response to Comment No. 343-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the overall construction schedule and the estimate of the construction trip generation. As discussed therein and as shown in Table IV.I-11 of the Draft EIR, the excavation/foundation subphase is anticipated to include up to approximately 640 total truck trips per day (320 truck trips in and 320 truck trips out of the Project Site), comprising approximately 300 haul trucks and approximately 20 delivery trucks, resulting in up to approximately 107 truck trips per hour on average. The mat foundation phase, which would only occur for five days and consists of approximately 1,000 truck trips per day (500 truck trips in and 500 trucks out), is the subphase with the greatest number of truck trips. Also note that the delivery trips associated with rebar, steel, decking, sheet rock, glass, exterior walls, HVAC,

plumbing, and other construction materials are included in the truck trips discussed in Topical Response No. 14 and are fully accounted for in the analyses within the Draft EIR. The construction trucks would range in size, with the largest trucks consisting of a full-size semi-truck (WB-40 classification).

Comment No. 343-3

Is this all going to be brought up and down Fairfax? Has anyone in the Planning Department actually driven Fairfax? Do you know how many lanes Fairfax is? If this project is built in 3 years as has been suggested in the Draft EIR, can you tell the public how hundreds of thousands of truck are required?

Thank you for your time.

Response to Comment No. 343-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Regarding the number of trucks, see Response to Comment No. 343-2.

Comment Letter No. 344

Rick Luna
118 S. Hayworth Ave., Apt. 1
Los Angeles, CA 90048-3672

Comment No. 344-1

As a 20 year resident of this area, I am very concerned about the amount of traffic this project will bring.

Response to Comment No. 344-1

This introductory comment is identical to Comment No. 343-1, but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 344-2

I cannot find clear information as to the number of trucks needed to access the TVC project to build this project. We know that the project has to excavate over 700,000 cubic yards of dirt. Depending on truck size that is anywhere from 50,000 to 70,000 diesel dump trucks. Then there are tens of thousands of trucks to bring concrete to the site. A typical concrete truck carries about 8 to 10 cubic yards. How many cubic yards of concrete will this project take to build the parking structures, foundations and other concrete structures?? How many trucks to deliver the rebar, steel, decking, sheet rock, glass, exterior walls, and HVAC, plumbing and electrical equipment will be needed?? How big are some of these trucks??

Response to Comment No. 344-2

This comment is identical to Comment No. 343-2. Refer to Response to Comment No. 343-2, above.

Comment No. 344-3

Is this all going to be brought up and down Fairfax? Has anyone in the Planning Department actually driven Fairfax? Do you know how many lanes Fairfax is? If this project is built in 3 years as has been suggested in the Draft EIR, can you tell the public how hundreds of thousands of truck are required?

Thank you for your time.

Response to Comment No. 344-3

This comment is identical to Comment No. 343-3. Refer to Response to Comment No. 343-3, above.

Comment Letter No. 345

Ben Mack

Comment No. 345-1

In this time of economic uncertainty, it's nice to see a project on the drawing board that will do so much to benefit the economy. Television City's studio renovation and modernization project, TVC 2050, will create thousands of jobs and will help meet demand for production space in Los Angeles.

The project will generate approximately \$2.4 billion annually in new economic output upon completion and approximately \$2.1 billion in total economic output during construction.

A project with these kinds of benefits doesn't come along very often. Since the Draft EIR concluded that TVC 2050 will have no significant long-term operational impacts and short-term temporary impacts in only two areas during construction, I would hope that this project will move through the approval process in a timely manner.

We need to keep our economy growing, and keep the entertainment industry thriving right here in Los Angeles.

Response to Comment No. 345-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 346

Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068-2781

Comment No. 346-1

I would like to submit the following comments on the TVC 2050 Project & Specific Plan EIR. While, in general, I support the expansion of production facilities at Television City, the EIR fails to provide adequate information to accurately assess the project's impacts with regard to air quality, greenhouse gas emissions, transportation and solid waste. I'm also concerned about the project's impact on this important historic resource, which helped to define the LA landscape in the 20th century.

My detailed comments are below. Thank you for your time.

Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068

Response to Comment No. 346-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 346-2 through 346-18.

Comment No. 346-2**TVC 2050 EIR COMMENTS****Project Description**

The project description outlines the development of the Television City campus, allowing for the construction of up to 1,626,180 square feet of new sound stages, production support, production office, general office, and retail uses, with buildout taking place either within a 32-month period or over the next 20 years. The project description says that there could be up to 350,000 sq. ft. of sound stages, although on page II-16 it notes that "The permitted sound stage floor area may be increased from 350,000 square feet up to a total of 450,000 square feet in exchange for decreases in other uses."

The problem is that the project description describes a film and TV production facility with up to 450,000 sq. ft. of sound stages, but subsequent sections of the EIR do not analyze the activities that actually take place in such a facility. Film and TV production facilities are a unique class, with specific needs with regard to production activities and transportation. But the EIR sections on air quality, greenhouse gas emissions and transportation do not acknowledge this.

Response to Comment No. 346-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 regarding the Project Description and proposed Specific Plan. Refer to Topical Response No. 1 and Response to Comment No. 9-14 regarding the proposed Land Use Exchange Program, which was comprehensively analyzed in the Draft EIR. Refer to Appendix FEIR-3 of this Final EIR, which discusses the maximum impact scenarios that were analyzed for each environmental topic. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 regarding the studio uses that would occur on-site. Additionally, refer to Response to Comment Nos. 346-3 to 346-18 below with regard to how the transportation impact analysis for the Project accounted for the proposed studio uses. Also refer to Response to Comment Nos. 26-28 and 26-E.1-28 regarding how production activities, including basecamps and trucks, have been accounted for in the air quality and GHG analyses.

Comment No. 346-3

Comparable production facilities with similar sound stage capacity in terms of square footage often have their own fleet of vehicles. Universal, Fox and Warner Bros. all have fleets of vehicles that range from golf carts to heavy duty diesel trucks. Warner Bros.' transportation fleet maintains over 270 owned and leased vehicles on the studio's main lot. A description of the vehicles commonly contained in studio fleets can be found in the ACME Directory of Film + TV.

<https://www.theacme.com/directory/transportation-car-truck-studio-rental>

Studio fleets commonly contain 2-axle & 3-axle tractors, stake bed trucks, camera trucks, 5 and 10 ton trucks, grip and electric trailers, passenger and cargo vans, shuttle busses and forklifts. None of these vehicles are mentioned in the EIR.

It would not be uncommon for a production facility the size of TVC 2050 to maintain some kind of studio fleet. And if there is no on-site studio fleet, then crews will still have to bring vehicles of their own to support their productions. The operation of a facility the size of TVC 2050, with the number and size of sound stages proposed, will inevitably involve the use of a range of vehicles, including 10 ton trucks, stake bed trucks, forklifts, shuttle

busses, etc., but none of this is covered in the EIR. Strangely, the EIR sections on air quality, greenhouse gas emissions and transportation do not make any mention of the kinds of vehicles listed above in connection with the project's operational phase. In fact, these three sections only mention trucks in the most general terms, without offering any specific details related to the actual project. The transportation section assures us that the project will not generate more than 100 truck trips per day, but offers no specific data to show how it reached that conclusion.

Response to Comment No. 346-3

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation. The estimate of truck trips to/from the Project is based on a combination of traffic counts of the existing TVC driveways and interviews with MBS, the largest independent operators of studio complexes and sound stages in the nation. The estimate of trucks associated with the Project includes:

Semi-Trailer Trucks (Heavy Trucks)	18/day
Single Unit and Box Trucks (Light Trucks—10 ton)	43/day
Delivery Trucks (Light Trucks—5 ton)	<u>22/day</u>
Total	83/day

Of this total, the semi-trailer trucks would be primarily WB-40 trucks. The occasional larger truck (WB-67) would enter the Project Site, but it is estimated that this would not occur on a daily basis.

The Project does not intend to maintain a studio-owned fleet of trucks. Even if the Project changed its operation and had a studio fleet on-site, the 83 trucks in/out of the Project Site on a given day would still be the appropriate estimate.

In addition to these trucks, the general office space in the Project would also generate truck activity but at a much lower level. The use of semi-trucks for general office space is typically limited to moving vans to move businesses in and out of the office floors, which happens infrequently. Certainly UPS, FedEx, and Amazon-type delivery trucks would also serve the general office space.

The analyses of air quality, GHG emissions, and transportation in the Draft EIR include these truck trips.

Please note that the SCAQMD threshold for HRAs is 100 trucks per day, not 100 truck trips as incorrectly stated in the comment (refer to page IV.A-72 of the Draft EIR).

Also shown in Table II-10 in Topical Response No. 10, the Project would include 83 trucks per day, which is below the threshold cited above.

Comment No. 346-4

It is troubling that, on page 12 of Appendix B, Air Quality & GHG Emissions, the EIR says it uses trip generation calculations based on the assumption that TVC 2050 is a mixed-use project. This is completely inaccurate. The project description makes it clear that this project is completely different from what is commonly defined as a mixed-use project. Even more troubling, in the subsequent worksheets showing CalEEMod data, it appears that calculations for the 450,000 sq. ft. of sound stages are based on the assumption that this part of TVC 2050 functions as an industrial park. This is also completely inaccurate.

Response to Comment No. 346-4

This comment misrepresents the trip generation discussion on page 12 of Appendix B of the Draft EIR. The Project is not described as a mixed-use project. Instead, a description of the LADOT VMT Calculator methodology was provided. Specifically, that model incorporates EPA MXD equations to calculate trip reductions for multi-use developments. Please see Response to Comment No. 26-E.1-23 for a discussion of the Draft EIR trip generation rates. In addition, please see Response to Comment No. 26-E.1-27 for a discussion of the selection of land use types (e.g., industrial park) within CalEEMod.

Comment No. 346-5

It appears that there is no accepted standard method for analyzing trip generation rates and emissions for film and TV production facilities. In fact, there is very little available data on trip generation rates and emissions for these uses. However, the EIR does not even make a good faith effort to analyze impacts from these activities. Unless the developer makes a clear commitment to prohibit the use of 10 ton trucks, stake bed trucks, shuttle busses, etc. on the TVC 2050 campus, the EIR must be updated to include information about the use of these vehicles.

Response to Comment No. 346-5

Refer to Response to Comment No. 346-3 and Topical Response No. 10, Trip Generation. The truck trip generation of the Project under full operating conditions was made based on empirical data and on the experience of seasoned operators of similar facilities. These truck trips are included in the trip generation analysis of the Project and, therefore, are already included in the traffic operations analyses requested by LADOT, as well as the operational air quality and noise analyses included in the Draft EIR.

Comment No. 346-6**Air Quality**

The EIR section on air quality only includes discussions of trucks in general terms, and makes no mention of the vehicles commonly used at a film and TV production facility. Again, the developer must either make a firm commitment to prohibiting the use of heavy-duty vehicles on the lot, or make a good faith effort to estimate what kind of vehicles will be used in production. Even those vehicles not maintained on the site itself, but which are expected to be commonly used in production activities should be disclosed.

Response to Comment No. 346-6

As stated on pdf page 11 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR and discussed in Response to Comment No. 26-E.1-16, the vehicle fleet mix used in the Project's air quality and GHG analyses were based on the Los Angeles County vehicle fleet mix (which includes trucks) from EMFAC2017, the version of EMFAC incorporated into the current version of CalEEMod at the time of Draft EIR publication. Heavy-duty vehicles were included in the air quality analysis provided in the Draft EIR. As discussed in Response to Comment No. 26-E.1-38, ZE and NZE truck use will occur in the future, and it is not within the Project's operational influence to ensure that only ZE or NZE vehicles operate at the Project Site. During operations, numerous independent productions will utilize on-site facilities, each with their own unique operational needs. These productions will utilize various independent contractors, who may themselves subcontract other entities, including small businesses, to provide goods and services to meet those needs. There is simply no feasible mechanism to fairly apply and enforce such a requirement given the diverse needs of, and multitudes of entities involved in, the Project's unique studio operational uses. In addition, Project Design Feature GHG-PDF-3 has been added in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at all basecamp areas. Refer to Response to Comment No. 346-3 regarding the number and types of production trucks.

Comment No. 346-7

As disclosed on page IV.A-26, "According to CalEnviroScreen, the Project Site is located in the 75th percentile, which means that the Project Site is worse than average in terms of pollution in comparison to other communities within California." Air quality in Central Los Angeles is not good, and the EIR needs to assess impacts from heavy duty vehicles that might reasonably be expected to be used during regular operations.

Response to Comment No. 346-7

This comment correctly identifies that the Draft EIR disclosed that the Project Site is located in the 75th percentile for air pollution according to CalEnviroScreen. As discussed above in Response to Comment No. 346-6, the vehicle fleet mix used in the Project's air quality and GHG analyses were based on the Los Angeles County vehicle fleet mix (which includes trucks) from EMFAC.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 346-8

The EIR also puts forward the ridiculous notion that long-term buildout would result in an overall reduction in operational emissions. The following paragraph is found on page IV.A-75:

From an operational standpoint, a long-term buildout would also result in an overall reduction in operational emissions due to more stringent requirements in the future. As an example, Title 24 requirements apply to projects based on the date when a building permit is issued. Thus, buildings constructed at a later date would be required to comply with subsequent versions of Title 24, which typically include increasingly stringent energy conservation requirements and associated reductions in energy use.⁸⁹ In addition, Governor Gavin Newsom signed Executive Order No. N-79-20 on September 23, 2020, which will phase out sales of new gas-powered passenger cars in California by 2035, with an additional 10-year transition period for heavy vehicles. With more stringent fuel economy requirements in subsequent years, fuel usage associated with the Project would similarly decrease. As such, a long-term buildout would reduce the Project's operational emissions.

This assertion can't be taken seriously. With absolutely no data, with no information about the kinds of vehicles to be used on site, and making the questionable assumption that California will actually enforce compliance with the law, the EIR claims long-term build-out will reduce operational emissions. With no data to support it, this claim is not credible.

Response to Comment No. 346-8

Contrary to what is stated in this comment, the Draft EIR provides substantial evidence that long-term buildout would result in an overall reduction in operational

emissions in comparison to a Year 2026 buildout. Buildout years 2026 and 2043 (long-term buildout) were analyzed using SCAQMD's recommended CalEEMod model. The results provided in Table IV.A-7 for Year 2026 on page IV.A-64 and Table IV.A-12 for Year 2043 on page IV.A-76 of the Draft EIR show that regional operational emissions would decrease under a long-term buildout scenario. The information provided above in this comment further supports that future more stringent regulations would reduce emissions. However, the Draft EIR analysis conservatively did not quantify the additional reduction in emissions. As an example, the Project would comply with the City's Ordinance No. 187714 (passed in December 2022), which requires all newly constructed buildings to be all electric. The reduction in emissions as a result of compliance with this new City ordinance was not accounted for in the Draft EIR.

The commenter, without evidence, also presumes that environmental laws will not be enforced or affect the fleet mix and inaccurately states that this invalidates the Project's air quality analysis. However, even without state regulations, federal requirements for cleaner heavy-duty equipment, such as the USEPA Clean Trucks Plan, will lead to cleaner, more efficient engine technologies and greater application of ZE vehicle technologies in heavy-duty vehicle fleets over the long-term buildout scenario.

Comment No. 346-9

Greenhouse Gas Emissions

Again, the EIR section on greenhouse gas emissions does not offer anything more than very general references to trucks, and offers no specific information on the use of vehicles commonly associated with film and TV production. Whether these are housed on-site as part of the facility's fleet, or whether they're brought to the site by the crews working there, the EIR needs to offer information on heavy duty trucks, diesel vehicles, etc., that will be used in the course of production activities at the TVC 2050 campus.

Response to Comment No. 346-9

Please refer to Response to Comment No. 346-6 for a discussion of the vehicle fleet mix used in the Draft EIR for evaluating the Project's air quality and GHG analyses. Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, and Response to Comment No. 26-E.1-16 for a discussion of Project truck trip generation during operation.

The Draft EIR disclosed all of the information required by CEQA to provide a comprehensive analysis of the Project's impacts. As discussed in Response to Comment No. 26-E.1-37, the threshold of significance adopted by the City for the GHG analysis is qualitative and based on the Project's consistency with appropriate laws, regulations,

plans, and policies. Quantitative information about Project trucks is provided where applicable in the Draft EIR, including, but not limited to, in Section IV.A, Air Quality; Section IV.K, Transportation; Appendix B; and Appendix M.

Comment No. 346-10

The EIR offers a single Production Design Feature (PDF) specifically addressing mobile emissions, but it does not address the actual range of vehicles to be used at the site, or the realities of travel behavior particular to film and TV production. We see the following PDF is offered on page IV.E-51:

Project Design Feature TR-PDF-2 implements a TDM Program that will include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, a Guaranteed Ride Home Program, and incentives for alternative travel modes. As discussed further below, the Project would also provide multi-modal transportation solutions, including an on-site Mobility Hub, to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobsrich [sic] area in close proximity to transit, which would further encourage the use of alternative transportation. These TDM measures would serve to reduce GHG emissions.

This PDF is inadequate in the following ways:

- It does not make any effort to discuss the range of vehicles that will be used on-site.
- It does not acknowledge the fact that film and TV production starts early in the morning and continues late into the night, therefore offering different challenges than a standard Transportation Demand Management program.
- It offers no information on specific lines that employees and crews might use to access the site, no information on Metro/DASH timetables or operating hours, and no information on the hours the shuttle will be in operation or frequency with which it will serve the site.

Response to Comment No. 346-10

Refer to Response to Comment No. 346-3 for a summary of the range of trucks serving the Project Site.

The comment is correct that typical studio hours for the television and film industry start early in the morning and sometimes continue into the evening hours. However, the

trip generation rates in the Transportation Assessment (Appendix M.1 of the Draft EIR) take this hourly pattern into account. Empirical counts at the Project driveways, separating trucks and cars, verified the trip generation rates use in the operational analyses. The work VMT per employee is not sensitive to the hourly patterns of employee travel to/from the Project Site and, therefore, would not affect the CEQA conclusions of less than significant transportation impacts reported in the Draft EIR.

The proposed TDM Program has been tailored to the studio nature of the Project. Topical Response No. 11, Transportation Demand Management, shows many examples of entertainment venues that have achieved TDM successes far above the levels studied for the Project.

In terms of existing transit service to the Project Site, Figure 12 on page 43 of the Transportation Assessment shows the bus routes currently serving the Project Site while Table 3 on page 57 shows the operating hours for these lines, demonstrating that most of the lines begin service early in the morning (4 to 6 A.M.) and go well into the evening (7:30 P.M. to 1 A.M.).

Transit service, like the roadways serving the Project Site, is busiest during the morning and afternoon peak commute hours. The fact that studio workers arrive early and leave early means that they have a better opportunity to use the transit system before its occupancy levels peak. Table 15 on page 140 of the Transportation Assessment shows that the Project is seeking to shift a minimum of approximately 134 people in the morning peak hour and 145 people in the afternoon peak hour from their cars to transit. Tables 4A and 4B on pages 58 and 59 of the Transportation Assessment show that today's bus service has approximately 2,000 empty seats in each of these peak hours to serve the Project employees and visitors, without even considering the opening of the Metro D (Purple) Line Wilshire/Fairfax Station.

The transit and TDM goals of the Project are achievable even before the Wilshire/Fairfax Station opens, and the proposed shuttle system to the station will only enhance that ridership.

Comment No. 346-11

Furthermore, the City often requires developers to outline TDM programs in conjunction with large scale projects, but the City has never made any meaningful effort to gather data on TDM programs or to assess whether they achieve any meaningful results. There is a negligible amount of data available on results from other TDM programs that include bike parking, pedestrian amenities, shuttle service, and carpool/vanpool programs. In fact, in many cases the City has made no effort to actually confirm that these measures are even implemented. A recent example is the failure of developer Relevant to actually implement

a carpool/vanpool program or to install bike parking at its Dream Hotel. The City has been informed that Relevant has failed to follow through on these actions and has made no effort to enforce compliance. Therefore, I have to ask why we should believe that the City will enforce compliance with the TDM proposed for the TVC 2050 project.

Response to Comment No. 346-11

Refer to Topical Response No. 11, Transportation Demand Management, for a description of the proposed TDM Program, transit usage, and examples of the effectiveness of TDM and transit plans in other comparable California projects.

The new TDM Ordinance, under consideration by the City Council now, will require the Project to conduct annual average vehicle ridership surveys to show that the TDM goals of the Project are indeed being met. If they are not being met, additional TDM measures would be required until the target is achieved. Thus, the City will have the authority to enforce the TDM Program.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 346-12

Appendix B, Air Quality & GHG Emissions

As noted above, while the project description offers one description of the uses and activities associated with TVC 2050, in Appendix B the EIR offers different and contradictory descriptions which call into question whether the data included in the CalEEMod worksheets provides an accurate assessment of emissions. On page 12 of Appendix B we find the following paragraph:

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments. The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project

features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

Let's be clear. The TVC 2050 project proposes the construction/expansion of a film and TV production facility. The standard definition of the term "mixed-use project" under the LAMC is a project that combines commercial uses and dwelling units in order to reduce vehicle trips and vehicle miles traveled by locating residents, jobs, and services near each other. While one of the project alternatives apparently incorporates some residential uses, it's clear that the developer's preferred alternative is to construct/expand a major film and TV production facility on the site. Using trip generation rates associated with a mixed-use project to calculate VMT and emissions data is completely inappropriate. Mixed-use projects do not involve the wide range of vehicles used at film and TV production sites, nor does the description of a mixed-use project cover the days/times of vehicle trips associated with film and TV production. For this reason, Appendix B does not give an accurate assessment of emissions for the project.

Response to Comment No. 346-12

The definition of mixed-use for purposes of VMT is different than that used in land use planning. There is no requirement that a project include residential land uses to be considered "mixed-use" as suggested in the comment. For purposes of VMT, a mix of commercial uses is permissible. The Project includes sound stages, production support, production and general offices, and retail—all of which have varying trip generation characteristics, joint trips, interaction among land uses, and varying seasonal and daily use activity patterns common to mixed-use projects. The trip generation rates used to calculate the Project trip levels isolated the trip characteristics of the individual land uses and the interaction between the land uses on the Project Site. The VMT analysis did not take any "credits" for mixed-use characteristics in the development of the work VMT per employee. Refer to Topical Response No. 8, Vehicle Miles Traveled.

Refer to Response to Comment Nos. 346-3 regarding the range of truck vehicles serving the Project Site.

Comment No. 346-13

Then, after saying the authors of the EIR used the mixed-use definition to determine trip generation rates, on page 25 of Appendix B, under 1.0, Project Characteristics, it appears that it was decided to analyze the sound stage portion of the project as an industrial park:

1.0 Project Characteristics

1.1 Land Usage

Floor Surface Area

Industrial Park 454,000.00

The table associates the industrial park use with a floor surface area of 454,000 sq. ft., which roughly corresponds to the amount of square footage for sound stages that would be allowed under the maximum buildout.

However, on page 102 of Appendix B we find the following under Table 4.2, which assesses trips generated during the operational phase:

4.2 Trip Summary Information

Average Daily Trip Rate

	<i>Weekday</i>	<i>Saturday</i>	<i>Sunday</i>
<i>Industrial Park</i>	0.00	0.00	0.00

Here we see that, while on page 25 of Appendix B the EIR authors appeared to be saying that the sound stages were being considered as industrial park space for the purposes of the CalEEMod analysis, they project that no trips at all will be associated with this use. **In fact, the authors project no trips generated for any of the uses listed except for user defined commercial.** [sic] It appears that now the authors have decided to yet another land use category to assess trips generated by the project:

	<i>Unmitigated</i>	<i>Mitigated</i>
	<i>Annual VMT</i>	<i>Annual VMT</i>
<i>User Defined Commercial</i>	22,310,515	22,310,515

Response to Comment No. 346-13

Refer to Response to Comment Nos. 26-E.1-27 and 26-E.1-28 for a discussion on the conservative nature of the CalEEMod land use modeling and its applicability to the Project's proposed land uses. The commenter incorrectly asserts that the CalEEMod analysis ignores VMT from sound stage uses. Please see Response to Comment No. 26-E.1-34 for an explanation of the industrial park land use, which was modeled as representative for Project-specific utilities demands. The VMT calculations identified in the User Defined Commercial line item on pdf page 102 of Appendix B of the Draft EIR are

representative of VMT estimated for all operations, as detailed further in Response to Comment No. 26-E.1-22.

Comment No. 346-14

Also, it seems that the number given under Unmitigated Annual VMT is exactly the same as under Mitigated Annual VMT. So while on page IV.K-33, under (f), TDM Strategies, the authors appear to be arguing that the proposed TDM strategies will serve as mitigation measures, Table 4.2, Trip Summary Information, shows absolutely no difference between mitigated and unmitigated VMT.

Response to Comment No. 346-14

This comment mischaracterizes the discussion on page IV.K-33 of Section IV.K, Transportation, of the Draft EIR, which describes the role of TDM strategies in the VMT Calculator in general. Page IV.K-33 states that “the VMT Calculator measures the reduction in VMT resulting from a project’s incorporation of TDM strategies as either project design features or mitigation measures.” As described in Section IV.K of the Draft EIR, the Project would include a TDM Program per Project Design Feature TR-PDF-2 (set forth on pages IV.K-37 to IV.K-40 of the Draft EIR); however, the CEQA transportation analysis did not account for the TDM measures to be conservative. The Draft EIR concluded that the Project’s transportation impacts would be less than significant. Accordingly, the TDM measures were not required to reduce any significant transportation impacts resulting from the Project. As the TDM measures are not mitigation measures, the reference table in this comment (Table 4.2, Trip Summary Information) within CalEEMod correctly showed no difference between mitigated and unmitigated VMT.

Comment No. 346-15

It’s also surprising that on page 107, under 8.0, Waste Detail, Appendix B offers no data at all for solid waste generation or associated emissions, either mitigated or unmitigated. We see only the following:

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Do the authors expect us to believe that no GHG emissions will be generated by the disposal of solid waste in landfills? This contradicts what numerous agencies, including the EPA, have found:

METHANE EMISSIONS FROM LANDFILLS

Municipal solid waste (MSW) landfills are the third-largest source of human-related methane emissions in the United States, accounting for approximately 14.5 percent of these emissions in 2020.

Basic Information about Landfill Gas from US EPA [https://www.epa.gov/lmop/basic-information-about-landfill-gas#:~:text=Methane%20Emissions%20from%20Landfills,-Note%3A%20All%20emission&text=Municipal%20solid%20waste%20\(MSW\)%20landfills,of%20these%20emissions%20in%202020](https://www.epa.gov/lmop/basic-information-about-landfill-gas#:~:text=Methane%20Emissions%20from%20Landfills,-Note%3A%20All%20emission&text=Municipal%20solid%20waste%20(MSW)%20landfills,of%20these%20emissions%20in%202020).

The idea that solid waste created by the project will generate no significant GHG emissions is ridiculous.

Response to Comment No. 346-15

The commenter incorrectly claims that the information included on pdf page 107 of Appendix B of the Draft EIR (CalEEMod output files) means that the Project would not result in GHG emissions generated by the disposal of solid waste in landfills. As discussed on page IV.E-81 and shown in Table IV.E-11 of the Draft EIR, the Project's GHG emissions from solid waste generation would result in a total of approximately 133 MTCO₂e per year, which accounts for a 76-percent recycling/diversion rate consistent with the City of Los Angeles Bureau of Sanitation's Zero Waste Progress Report. The commenter's statements regarding information about landfill gas from the USEPA are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 346-16

The Initial Study and the EIR section on Other CEQA Considerations assert there will be no significant impacts related to solid waste, but offer no actual evidence to support this conclusion. We are asked to believe that 350,000 to 450,000 square feet of sound stages, with all the activities associated with film and TV production, including set construction, costume preparation and catering, in addition to the proposed office space, will have no significant impacts with regard to solid waste. This is not credible, and the EIR offers no evidence of any kind to support this assertion.

The EIR section Other CEQA Considerations states that the project will comply with all existing laws regarding the disposal and recycling of solid waste, but this is not true. AB 939 requires all municipalities to recycle at least 50% of their solid waste, but the City of LA has never achieved this rate of recycling, and in fact, has never even gotten close. The project will be served by the City's RecycLA program, which actually only recycles between

20% and 30% of solid waste collected. While the City may have adequate landfill capacity to dispose of the remainder, this will produce methane, a greenhouse gas far more potent than CO₂. I quote again from the EPA web site:

Methane is a potent greenhouse gas 28 to 36 times more effective than CO₂ at trapping heat in the atmosphere over a 100-year period, per the latest Intergovernmental Panel on Climate Change (IPCC) assessment report.

The EIR does not appear to make any effort to quantify the amount of operational waste that will be generated by the project, nor does it appear to make any attempt to assess how much waste will be diverted to recycling or sent to landfills. A project the size of TVC 2050 will undoubtedly produce large amounts of solid waste during its operational phase. In the total absence of any data or evidence to support their views, the EIR authors' assertion that the project will have no significant impacts with respect to solid waste and associated GHG emissions is not credible. And the complete lack of any data on waste in Other CEQA Considerations and CalEEMod calculations shows that the authors haven't even bothered to consider this issue.

Response to Comment No. 346-16

The comment incorrectly claims that the Draft EIR did not evaluate solid waste impacts. Refer to pages 79 through 83 of the Initial Study included as Appendix A of the Draft EIR and pages VI-33 through VI-35 of Section VI, Other CEQA Considerations, of the Draft EIR. As shown therein, the Project's estimated net increase of approximately 643 tons per year for solid waste disposal represents approximately 0.0004 percent of the remaining capacity (148.40 million tons) at the Class III landfills serving the County of Los Angeles. The analysis was conducted in accordance with City methodology and used solid waste generation rates provided by LASAN. The Initial Study correctly concluded that impacts related to solid waste would be less than significant.

As discussed on page IV.E-81 of the Draft EIR, GHG emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod default solid waste generation rates for each applicable land use were selected for the analysis. This comment does not provide substantial evidence as to why the solid waste generation rates used in the Draft EIR or the diversion/recycling rates included in the City's Zero Waste Progress Report would not be applicable to the Project. As discussed in Response to Comment No. 346-15, CalEEMod was used to calculate both the solid waste generation rate and related GHG emissions. The commenter's statements regarding methane as it relates to GHG emissions is noted for the record.

Comment No. 346-17**Transportation**

It's hard to assign any credibility to the EIR section on transportation, since, as discussed above, the authors of the EIR apparently couldn't decide whether the project should be assessed as a film/TV production facility, a mixed-use project, an industrial park or user defined commercial. Also, the EIR section on transportation does not offer anything more than very general references to trucks, and offers no specific information on the use of vehicles commonly associated with film and TV production. Whether these are housed on-site as part of the facility's fleet, or whether they're brought to the site by the crews working there, the EIR needs to offer information on heavy duty trucks, diesel vehicles, etc., that will be used in the course of production activities at the TVC 2050 campus.

Again, as discussed above, the EIR offers a single Production Design Feature (PDF) specifically addressing mobile emissions, but it does not address the actual range of vehicles to be used at the site, or the realities of travel behavior particular to film and TV production. And, according to Appendix B, Table 4.2, Trip Summary Information, the CalEEMod calculations show no difference between mitigated and unmitigated annual VMT.

Response to Comment No. 346-17

The Project is a studio project and is also a mixed-use project for purposes of VMT by the very nature of its combination of different land use components. Section II, Project Description, of the Draft EIR presents a clear description of the proposed land uses. The Transportation Assessment included as Appendix M.1 of the Draft EIR analyzes the Project with the best information available in terms of trip generation, distribution, and travel characteristics.

Refer to Response to Comment No. 346-3 regarding the range of vehicles.

See Topical Response No. 10, Trip Generation, regarding the truck and automobile trip generation estimates during Project operation. Truck trips are not factored into the work VMT per employee so the discussion of truck trips in the CEQA portion of the Transportation Assessment and in the Draft EIR is limited as noted in the comment. However, the trip generation rates used in the operational non-CEQA analysis included truck trips in the analysis. The primary effect of trucks on the transportation system involves those trucks entering and leaving the Project Site throughout the day, and those truck trips are included in the trip assignments and the traffic operation analyses summarized in the non-CEQA portions of the Transportation Assessment.

Refer to Response to Comment Nos. 346-13 and 346-14, above, for a discussion of air quality.

Comment No. 346-18

The EIR section on transportation also does not appear to make any serious effort to assess impacts caused by traffic intrusion into residential neighborhoods. Since there are residential neighborhoods on three sides of the project, impacts from intrusion must be given serious consideration.

Response to Comment No. 346-18

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment Letter No. 347

Roman Madril
800 S. Fairfax St., Apt. 17
Los Angeles, CA 90036-4466

Comment No. 347-1

I have some issues with the TVC 2050 plan and the impacts it will bring to our Beverly/Fairfax neighborhood.

Response to Comment No. 347-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 347-2 through 347-6.

Comment No. 347-2

My main concern is with public safety and how I believe the development will have negative impacts in our area in that regard.

Response to Comment No. 347-2

As discussed in detail on pages IV.J.2-12 and IV.J.2-13 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project would include a number of security features including security cameras and 24-hour security personnel that would monitor the Project Site on a 24-hour basis. As also discussed therein, as well as in Response to Comment No. 16-5, LAPD has concluded that the Project's impacts associated with the need for police protection and associated police protection facilities would be less than significant.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 347-3

I saw in the Draft EIR that there will be a mobility hub added to the area to help mitigate some traffic, but I think this form of mitigation will be worse for the neighborhood. With public transportation, studies show transient people start showing in areas where they can hang out and gather, especially if it provides a sheltered area. Now, I sympathize with the

homeless, but I am also worried about the [sic] safety. How is the city going to address this issue? Where is the plan for how to handle teenagers on skateboards, the homeless who may need shelter, and people who have no other place to hang out? Is there a plan for additional police presence or some kind of police kiosk? People will not ride the transit or use the mobility hub if they do not feel safe and secure as well so that traffic mitigation idea may actually make things worse. If folks aren't going to take the bus they will drive and there will be additional busses not reaching capacity in the area which will add to the traffic.

Response to Comment No. 347-3

Refer to Topical Response No. 7, Mobility Hub. The Mobility Hub is a part of the Project and is not a mitigation measure as this comment incorrectly states. The Mobility Hub would be a private facility serving the Project's employees, visitors, and audience members, and it would be controlled by the Project's security personnel. With regard to the Project's security plan and associated security features, as well as the adequacy of LAPD police protection services to serve the Project Site, refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment No. 16-5. The comments regarding homeless and transient people, teenagers, public safety and bus capacity do not concern environmental issues under CEQA. Nevertheless, these comments are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 347-4

Ultimately, the point I would like to make in this letter is that this proposed development is not for this area. The size, the modernization, the huge number of people it will bring to the property, the many events—none of these aspects of the development are suited for the neighborhood. Why is the planned development considered a good fit and right for our neighborhood?

Response to Comment No. 347-4

This comment is substantively similar to Comment No. 172-3. Refer to Response to Comment No. 172-3 regarding the Project's compatibility with the surrounding area.

Comment No. 347-5

I am genuinely very concerned about my safety and the safety of my neighborhood. Will the developer do anything to help mitigate the public safety issues we are going to have? I feel like this traffic study in the DEIR does not paint the correct picture of the impact that our neighborhood is going to experience. Did the DEIR take into consideration how public safety is impacted by adding mobility hubs such as bus stations? What other means of

transportation could we consider other of [sic] busses? Clearly what needs to happen is that we need to slow way down on the process this proposal is going through and really examine the validity of this Draft EIR.

Response to Comment No. 347-5

Refer to Response to Comment No. 347-3 with regard to security and the Mobility Hub. With regard to neighborhood traffic, refer to Topical Response No. 9, Neighborhood Traffic Management Plan.

The City has allowed for adequate public participation in the CEQA process and has complied with all applicable laws and noticing requirements. Refer to Response to Comment No. 32-3.

The commenter's opinion regarding the pace of the CEQA process is nevertheless acknowledged for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 347-6

Why isn't this proposal being reviewed by other committees in our neighborhood council such as a committee that deals solely with transportation? It is imperative that we take our time with project and not rush it through because it is some billionaire trying to develop.

Response to Comment No. 347-6

The Mid-City West Neighborhood Council was included on the City's agency mailing list for the Project. Following the publication of the Draft EIR in July of 2022, the Project was considered during several public meetings before the Mid-City West Neighborhood Council's Planning and Land Use Committee and Executive Council in August and September of 2022, respectively, both of which voted to support the Project. Refer to Response to Comment Nos. 28-13 and 32-3 regarding public outreach and noticing. As discussed therein, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has engaged in an extensive outreach program.

Comment No. 347-7

Thank you for taking the time to read my letter and take my concerns into consideration.

Response to Comment No. 347-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 347-2 through 347-6.

Comment Letter No. 348

Miriam Majer
327 N. Alta Vista Blvd.
Los Angeles, CA 90036-2542

Comment No. 348-1

I'm writing regarding the draft EIR for the CBS Television Studio project. I am a 30 year resident and I am not very happy at the moment reading this document.

Response to Comment No. 348-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 348-2.

Comment No. 348-2

The application says the project will use 6x the current water use. I am a strong proponent of water conservation. Will the project actually use 6x the amount of current consumption or is that what will be allowed? I cannot water my grass yet they get 6 times the water? What will that amount of water be used for?

Where is that water going to come from? Won't that affect the availability of water for other needs the city and the actual community here needs? We have a serious water problem. What if the property uses change over time? Like more visitors for the sounds sages?

Response to Comment No. 348-2

Refer to Response to Comment No. 223-2 above regarding sources of the City's water supply and the proposed uses and Response to Comment No. 223-3 above regarding procedures if on-site uses subsequently change.

Comment No. 348-3

Thanks for responding to my questions.

Response to Comment No. 348-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-

makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 348-2.

Comment Letter No. 349

Sol Majer
327 N. Alta Vista Blvd.
Los Angeles, CA 90036-2542

Comment No. 349-1

The EIR says there will be thousands of trucks staged near Loyola High School. Thousands. Idling trucks spewing pollution near teenagers with developing brains. Why will those trucks be in that community? What regulations would allow that to happen? There are lots of people living there that don't make a lot of money. Has anyone looked at the environmental justice issues? Is that in the EIR? Where is the information about the impacts on people's health, not only from the trucks staged near the school but from all the truck traffic that will be coming?

Where have these possible consequences been identified and studied? If they haven't been yet, when are those studies going to be done?

Response to Comment No. 349-1

This comment is similar to Comment No. 332-5. Refer to Response to Comment No. 332-5, above.

Comment No. 349-2

Is the city really thinking of permitting developers to dump its pollution on the poor in order to make a few bucks is wrong. This should not go forward until health risks are studied at the very least and alternatives are seriously considered.

Response to Comment No. 349-2

This comment is substantively similar to Comment No. 332-6. Refer to Response to Comment No. 332-6, above.

Comment Letter No. 350

Mikel Mann
P.O. Box 515407
Los Angeles, CA 90051-6707

Comment No. 350-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 350-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 351

Jeff Mapes
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 351-1

Our economy needs all the help we can muster and TVC 2050 is a dream come true in terms of the economic benefits it will bring. This is a long-term investment in one of our cities greatest production facilities—Television City.

It's estimated that TVC 2050 will create 4,220 jobs during construction and 18,760 jobs during operations. That translates into \$2.1billion in total economic output during construction and \$2.4 billion annually in new economic output once the project is completed. With numbers like this, what's not to love?

It's rare to have such an amazing opportunity for growth that will do so much for the local community. I encourage your support for Television City's project

Response to Comment No. 351-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 352

David Marady

Comment No. 352-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 352-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 352-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 352-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 352-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 352-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 352-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 352-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 352-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 352-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 352-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 352-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 352-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 352-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 353

Jessica Marak
459 N. Edinburgh Ave.
Los Angeles, CA 90048-2307

Comment No. 353-1

The amount of sound stages proposed will overwhelm our neighborhood! 350,000–450,000sf [sic] of sound stages could be 20 to 25 stages. Even if it's 14 stages as the applicant has shown, that's too much production space on this site. How many production trucks will be going to and from the site each day for all of those sound stages? The Draft EIR does not say and that's critical for the community to understand.

Response to Comment No. 353-1

Refer to Section E, Truck Trips, of Topical Response No. 10, Trip Generation, and Response to Comment No. 346-3 regarding the truck trip generation estimates during Project operation.

Comment No. 353-2

Has the Draft EIR adequately analyze [sic] the impact of all of those trucks on air quality, greenhouse gases and traffic? It's impossible to tell because there is no explanation of how many production trucks are associated with stages each day. And how many of the stages will be used for audience shows? Today all of the stages are for audience shows. The traffic information makes no mention of the number of audience shows and the related traffic. Was that not included in the analysis? It could be thousands of additional cars.

Response to Comment No. 353-2

Audience trips are included in the trip generation rates for the sound stages; accordingly, the analysis of audience trips is included in the operational analyses requested by LADOT (Chapter 5 of the Transportation Assessment [Appendix M.1 of the Draft EIR]). On an annual basis, the audience trips would represent a small percentage of the total trips in and out of the Project Site. Refer to Topical Response No. 10, Trip Generation, for a description of the derivation of the trip generation estimates for the Project, as well as a discussion of the visitor trips and audience show trips to/from the Project Site.

The operational analyses of air quality and GHG emissions in the Draft EIR include these truck trips. Refer to the mobile emissions lines on Table IV.A-7 on page IV.A-64 of

Section IV.A, Air Quality, and Table IV.E-11 on page IV.E-78 of Section IV.E, Greenhouse Gas Emissions, of the Draft EIR.

With respect to traffic associated with truck trips, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 353-3

Where will they park?

Response to Comment No. 353-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment Letter No. 354

Karen Margarete
P.O. Box 691238
West Hollywood, CA 90069-9238

Comment No. 354-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 354-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 355

Solomon Margo
612 N. Laurel Ave.
Los Angeles, CA 90048-2321

Comment No. 355-1

We all know this is a vital industry for Los Angeles However, [sic] I am concerned about how my area will take on all of consequences of what is being proposed to expand the studio facilities at Television City because this is major project, and one that does not fit in our neighborhood.

Response to Comment No. 355-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 355-2 through 355-4.

Comment No. 355-2

First, the studio expansion will bring thousands of new employees driving thousands of cars. These workers won't all be from this area, and so my biggest question is, where will they all park? It seems like the studio's parking is already maxed out, and the EIR says that more than 5,000 new parking spaces are required. Where is that additional parking going to go? Is it going to spill into the neighborhood? And if they build these large parking structures, how will anyone get out of them during rush hour?

Response to Comment No. 355-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Additionally, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site.

Comment No. 355-3

And what happens if there is an emergency during that time? How will emergency response vehicles be able to get to Cedars Sinai in an emergency? There is gridlock now

that can keep an EMT vehicle stuck, not being able to get through bottlenecks in traffic. The application seems to minimize the problem so what assumptions were used in studying this issue?

Response to Comment No. 355-3

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for information regarding emergency response times. As described therein, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Comment No. 355-4

What is the smallest footprint possible for the objectives of the development? Sure they need sound stages to make big action movies, loud ones at that, but do they need thousands of square feet of office space? Did anyone look at a different set of options that maybe only included the production facilities and not all the offices? What offices are actually going to be used and for what purposes?

Response to Comment No. 355-4

Television City has been an operating studio within the Project Site since 1952 and will continue to operate as a studio upon completion of the Project. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed on pages II-10 to II-11 in Section II, Project Description, of the Draft EIR, the Project objectives include optimizing the currently underutilized studio and maximizing studio production capabilities by providing new technologically advanced sound stages combined with an adequate and complementary mix of state-of-the-art production support facilities, production office, and general office. The Project, as described in Section II, Project Description, of the Draft EIR (summarized in Table II-2 and depicted in Figure II-4, Conceptual Site Plan, of the Draft EIR), includes an operationally feasible balance of studio uses to meet modern production needs. The digitization of the production industry has created the need for much more office space relative to sound stage and production support space. Refer to Response to Comment Nos. 9-13 and 26-16 regarding the need for office space in modern studios. Also note that Section V, Alternatives, of the Draft EIR presented alternatives with reduced square footage.

Comment No. 355-5

This all seems like too much for my community to take in, especially since there have to be other viable options. Please listen to the community and take another look at whether this project is really necessary.

Thanks for listening.

Response to Comment No. 355-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 355-2 through 355-4.

Comment Letter No. 356

Stephen Marinko
624 N. Poinsettia Pl.
Los Angeles, CA 90036-1927

Comment No. 356-1

My name is Stephen Marinko, I am a resident of 13 years. I am very concerned about several things in the EIR for the studio project at the CBS building that need additional explanation.

Response to Comment No. 356-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 356-2

Why would this be an objective that is included in a review and assessment of impacts to the community and to the area of the project? The City should be caring about the lives and welfare of its residents, not whether some developer's investments achieve their anticipated return. What is the amount of this return? The EIR seems to reject alternatives because the developer doesn't come out AS far ahead financially. We need to know what the financials underlying this objective are. How is it determined that major impacts of a project, like are expected from this project, are outweighed by factors that could include how much of a return the developer gets? Where is that in city or state law?

Response to Comment No. 356-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 356-3

Where are all these people going to park? The EIR states more than 5,000 parking spaces are required for the influx of people, but then says that the parking spaces may be offsite. And the number of people expected is greater than the number of parking spaces being planned. Will that spill over into my neighborhood? What streets is the parking expected

to spill over onto? If the parking is offsite, what are the noise impacts, the safety issues from people speeding in the community, the pedestrian impacts, and other impacts of off-site parking? If this is going to require the taking of road spaces in front of people's homes, shouldn't that be accounted for? These impacts need to be analyzed.

Response to Comment No. 356-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 356-4

Accountability is important. Please let me know what this accountability will look like.

Response to Comment No. 356-4

This comment discusses accountability in general terms, and therefore a specific response cannot be provided. This comment is therefore noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 356-1 through 356-4.

Comment No. 356-5

. [sic] Who ultimately is responsible for ensuring that the community and surrounding neighborhoods are not left irreparably harmed and changed by this massive development being proposed? The neighborhood didn't ask for this, and 90% of my neighbors don't want it. It would be something that was done to us—not to benefit us, not for us. How can a development be forced upon a community when it may well not be the right development for a location?

Response to Comment No. 356-5

The Final EIR identifies parties responsible for enforcing mitigation measures. Section IV, Mitigation Monitoring Program, of this Final EIR includes details regarding timing, enforcement, and actions indicating compliance related to the Project's PDFs and mitigation measures.

The remainder of this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 357

Vicky Marino
7905 Melrose Ave.
Los Angeles, CA 90046-7109

Comment No. 357-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 357-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 358

Larry Marshall
648 N. Laurel Ave.
Los Angeles, CA 90048-2321

Comment No. 358-1

I have lived in the neighborhood for over forty years. I have seen a tremendous increase in traffic since the introduction of the Beverly Center, Beverly Connection and the Grove. Please stop the trend toward greater density where I live.

Response to Comment No. 358-1

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, in Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment Letter No. 359

Jose Martinez
130 N. Sweetzer Ave.
Los Angeles CA 90048-3508

Comment No. 359-1

As a local resident, I am very concerned about the Television City 2050 Studio project, I have lived in the neighborhood for over ten years..

Response to Comment No. 359-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 359-2 through 359-4.

Comment No. 359-2

I'm trying to review the EIR, but like for many, this document is huge and complex, and I am still not fully aware of what the project actually is, much less understand the big changes that would ensue in our neighborhood.

Response to Comment No. 359-2

Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, and Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Comment No. 359-3

I am very concerned about the overflow traffic that residents can expect coming into our neighborhood. What streets will dump trucks, construction trucks and trucks carrying heavy equipment be allowed to drive on? Are neighborhood streets included in where they can travel, and if so, which ones? If any driving on those streets is going to be allowed, what hours of the day and which days of the week? I'm sure you can understand why I would be asking—this is a family and residential area, so if we are going to experience the

impacts of all the truck and additional car traffic, we should be informed exactly where that driving will be happening. Where is a map of the routes the different trucks and additional cars can take?

Response to Comment No. 359-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes. Construction trucks would be required to follow the haul routes approved by LADOT. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD. A construction manager would be appointed by the Project and his/her phone number would be advertised on the Project website and communicated to the neighbors so that trucks on the local streets could be reported to the construction manager, who, in turn, could call for targeted enforcement.

Comment No. 359-4

In the EIR, the developer said that they will “designate” a construction manager to serve as a liaison with the surrounding community and respond to any construction related questions. When will that construction manager be in place? And what times will that person be available? Is there a timeline for this community liaison to speak to us? Will this construction manager be accessible to the community before construction starts? Before preparation starts or will this be something after all of these changes have been set in motion?

We already do not have a liaison to discuss this project with. The developer has only stated positive things about the project, not given us real information about what will be the real impacts to our lives every day. And for how many years? It is not clear whether the project will take 3 years or 20 years—so when will residents know for sure? Will the project get approved without that timeline known for sure? How is that acceptable, to not know what to expect?

My neighbors and I have a lot of questions and still have yet to see someone acting as a liaison in my community for this project.

Response to Comment No. 359-4

Refer to Section IV, Mitigation Monitoring Plan, of this Final EIR for details on timing of all PDFs and mitigation measures, including Project Design Feature TR-PDF-1 requiring preparation of a CTMP. The CTMP, which includes designation of a construction manager to serve as a liaison to the community, would be prepared prior to construction and would be reviewed and approved by LADOT. As set forth in Project Design Feature TR-PDF-1,

as part of the detailed CTMP, the contact information for the construction manager will be posted on-site in a readily visible location and adjacent property owners and occupants will be notified of upcoming construction activities in advance of the start of construction.

With respect to the construction timeline, refer to Response to Comment No. 9-24.

Comment No. 359-5

I look forward to someone answering my questions, and having those answers before the project is allowed to be built.

Response to Comment No. 359-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 359-2 through 359-4.

Comment Letter No. 360

Alicia Matricardi
6230 San Vicente Blvd., Ste. 23
Los Angeles, CA 90048-5416

Comment No. 360-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

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Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 360-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 361

Luis Matute
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 361-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 361-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 362

Anne McAllister
144 N. Detroit St.
Los Angeles, CA 90036-2916

Comment No. 362-1

I have some questions regarding the Draft EIR (ENV-2021-4091-EIR) for the TVC 2050 Project and would appreciate clarification on the following issues:

Response to Comment No. 362-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 362-2 through 362-8.

Comment No. 362-2

1. It appears the conceptual project is subject to change by utilizing the land use exchange program. If the Director approves an exchange of land uses, who will conduct the environmental analysis to determine if the exchange of uses will yield additional environmental impacts? What methodology will be used to determine these impacts? Would any of these land use exchanges result in possible significant impacts? If so, how will this be addressed?

Response to Comment No. 362-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-14 with regard to the Project Description and proposed Specific Plan, including a discussion of the limited Land Use Exchange Program. As discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review. Also refer to Appendix FEIR-3 of this Final EIR for a summary of the maximum impact scenarios that were analyzed in the Draft EIR and that represent the measure against which future land use exchange proposals may be considered.

Comment No. 362-3

2. If the VMT calculator does not include stage or production related uses, explain how you arrived at the empirical data used for the VMT calculator. How was the credit for internal capture derived? -

Response to Comment No. 362-3

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis. The VMT Calculator was run using its custom land use feature for all non-retail uses, which requires inputs of daily trips, total employees, and trip purposes. The estimation of daily trips was prepared using the empirical trip rates described in Topical Response No. 10, Trip Generation, and no credit for internal capture was applied.

Comment No. 362-4

3. If the project proposed is conceptual in nature, could the location of the tallest buildings change on the site? If so, how can the adjacent residents and property owns [sic] provide input on these height changes?

Response to Comment No. 362-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-16, 11-3, and 26-7 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, and the regulatory process under the proposed Specific Plan. As discussed therein, the Project includes height zone, stepback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. These requirements are not currently required under the existing zoning code. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, stepbacks, and frontage areas associated with the Project.

Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings, the dates of which will be published in accordance with the City's noticing requirements.

Comment No. 362-5

4. If alcohol is sold on-site during events, will police presence also be increased in order to reduce any residual impacts of large intoxicated crowds that may spill into the surrounding neighborhoods?

Response to Comment No. 362-5

With regard to police presence at special events, the Applicant currently provides advance notice to and coordinates with LAPD regarding large special events that take place on the Project Site. As under existing conditions, on-site security and safety measures would continue to be implemented as part of future operations within the Project Site. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding how special events would continue to be governed by the LAMC, consistent with existing conditions.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 362-6

5. I could not find the Specific Plan referenced in the Draft EIR. Was it located in one of the appendices?

Response to Comment No. 362-6

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment No. 362-7

6. It appears the project proposes 10 access points. It seems that will increase pedestrian/vehicle conflicts. What tools will the project implement to provide maximum safety to pedestrians?

Response to Comment No. 362-7

As shown in Figures II-7 and II-8 in Section II, Project Description, of the Draft EIR, the Project would include nine vehicular access points and eight pedestrian access points.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 26-E.4-3 regarding hazards and pedestrian safety.

Comment No. 362-8

7. Studios are usually built like fortresses due to security concerns. Specifically, how will the project integrate the walled studio with the surrounding neighborhoods?

Response to Comment No. 362-8

The Project Site is already developed with an existing studio that has been operating for over 70 years and the Project would continue the existing studio use. The Project's design is pedestrian-oriented and enhances the public realm, while also accounting for the security needs of a secure studio campus. Refer to Response to Comment Nos. 16-72, 28-18, and 172-3 regarding the proposed public realm enhancements and the integration of the Project with the surrounding community.

Comment Letter No. 363

Kathryn McGee
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Comment No. 363-1**I. INTRODUCTION**

This letter comments on the Draft Environmental Impact Report (DEIR) for the TVC 2050 Project (Project) at the approximately 25-acre Television City Studio property located at 7716–7860 W. Beverly Boulevard in Los Angeles, California (Project Site). The DEIR fails to adequately analyze, disclose, and acknowledge direct and indirect historical resources impacts on the adjacent property to the south, which includes the Gilmore Adobe and Farmers Market, located at 6301 and 6333 W. 3rd Street in Los Angeles, CA (Assessor Parcel Numbers 5512-003-030, 032, [sic] and -033, designated together as City of Los Angeles Historic-Cultural Monument No. 543). Additionally, the DEIR fails to adequately analyze, disclose, and acknowledge indirect impacts on several adjacent and nearby historic districts. This document explains these issues in detail, beginning with a description of the Project and regulatory setting; providing historical background and description of existing conditions; then including comments on the DEIR, and explaining how the Project has the potential to adversely impact historical resources.

III. [sic] REGULATORY SETTING**National Register**

The National Register of Historic Places is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and indicate what properties should be considered for protection from destruction or impairment,”¹ [sic] Administered by the National Park Service, the National Register is the nation’s official list of historic and cultural resources worthy of preservation. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. Resources are eligible for the National Register if they meet one or more of the following criteria for significance:

- A) are associated with events that have made a significant contribution to the broad patterns of our history; or
- B) are associated with the lives of significant persons in our past; or

- C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D) have yielded or may be likely to yield, information important in history or prehistory.²

Once a resource has been determined to satisfy one of the above criteria, then it must be assessed for “integrity.”³ Integrity refers to the ability of a property to convey its significance. Evaluation of integrity is based on “an understanding of a property’s physical features and how they relate to its significance.” The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association. To retain integrity, a property must possess several, and usually most, of these aspects.

Relationship to this report: The Project is located near the National Register-listed Beverly Fairfax Historic District and the potential Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District, which was found eligible for listing in the National Register in SurveyLA, the Los Angeles citywide historic resource survey.

California Register

Based substantially on the National Register, the California Register is “an authoritative guide... used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected.”⁴ For a property to be eligible for listing in the California Register, it must be found by the State Historical Resources Commission to be significant under at least one of the following four criteria:

- 1) is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
- 2) is associated with the lives of persons important in our past; or
- 3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values; or
- 4) has yielded, or may be likely to yield, information important in prehistory or history.

Also included in the California Register are properties which have been formally determined eligible for listing in or are listed in the National Register; are registered State Historical Landmark Number 770, and all consecutively numbered landmarks above

Number 770; and Points of Historical Interest, which have been reviewed and recommended to the State Historical Resources Commission for listing.

Relationship to this report: The Project is located near the California Register-listed Beverly Fairfax Historic District and the Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District, which was found eligible for listing in the California Register in SurveyLA.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) was enacted in 1970 and offers protection for identified historical resources. In general, for purposes of CEQA and environmental review, an “historical resource” is that which has been determined eligible for listing in the California Register, or one that is designated at the local level. The term “historical resource” includes the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (Pub Res Code SS5024.1, Title 14 CCR, Section 4850 et seq).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register (Pub Res Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to 5020.1 (k) of the Public Resources Code), or identified in an historical survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the

resource may be an historical resource as defined in Public Resources Code Sections 5020.1 (j) or 5024.1.

Relationship to this report. The Project is located nearby properties and historic districts that are historical resources under CEQA, including but not limited to: the Gilmore Adobe and Farmers Market, locally listed as a City of Los Angeles Historic-Cultural Monument (HCM); the National Register-listed Beverly Fairfax Historic District; the potential Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District; and the Miracle Mile North HPOZ.

City of Los Angeles

§22.171.7 of the Los Angeles Administrative Code defines criteria for designation of a Historic-Cultural Monument (HCM). For ease in applying local eligibility, the following numbers are assigned to the criteria, which align, to a large degree, with National and California Register criteria. Resources eligible for HCM designation are:

- 1) Historic structures or sites in which the broad cultural, economic or social history of the nation, state or community is reflected and exemplified; identified with important events in the main currents of national, state, or local history; or
- 2) Historic structures or sites identified with personages in the main currents of national, state or local history; or
- 3) Historic structures or sites which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction or a notable work of a master builder, designer, or architect whose individual genius influenced his age.

An HPOZ is defined as:

a planning tool which recognizes the special qualities of areas of historic, cultural, or architectural significance. An HPOZ does not change the underlying zoning, rather it lays an added level of protection over a zone through local board oversight.⁵

The HPOZ criteria for evaluation state that structures, natural features, or sites within the involved area, or the area as a whole, shall meet one or more of the following:

- A. Adds to the historic architectural qualities or historic associations for which a property is significant because it was present during the period of significance, and possess historic integrity reflecting its character at that time.
- B. Owing to its unique location or singular physical characteristics, represents an established feature of the neighborhood, community, or City.

- C. Retaining the structure would help preserve and protect an historic place or area of historic interest in the City.⁶

Relationship to this report: The Project Site is located near the Gilmore Adobe and Farmers Market, locally listed as a City of Los Angeles Historic-Cultural Monument (HCM no. 543, see additional information below); the potential Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District, which was found eligible as an HPOZ in SurveyLA; and the Miracle Mile North HPOZ.

Gilmore Adobe and Farmers Market HCM Designation: The Gilmore Adobe and Farmers Market were designated together as City of Los Angeles HCM No. 543 in 1991. The HCM designation includes the following description establishing the Adobe structure and its landscaping, the historic use of the Farmers Market, and the historical association with the Gilmore family as significant aspects of that HCM's history:

The Gilmore (Rancho La Brea) Adobe, built approximately 1852, is a one-story adobe brick structure finished with stucco. It has a moderately pitched roof covered with red tiles, a wide eaves overhang, a pave-tiled porch, exposed cross-bracing rafters, and heavy wood lintels above the wood-frame casement windows. A high stone wall and landscaping with mature trees surround the adobe, and two rear wings were added in the 19th century. Lawns on the north and east are crossed by terra-cotta tiled brick pathways.

The Farmers Market originated in 1934 as a site for depression era farmers to sell fresh farm produce, fruit and eggs. The site, currently owned by the A.F. Gilmore Co., houses an open air market with over 160 stalls representing a variety of farm produce, fruits, vegetables, gifts and novelty items.

The Clock Tower, added during the 1950's, [sic] has become an observable landmark for the Market, visible from quite a distance.

The Gilmore (Rancho La Brea) Adobe has particular historic and cultural significance to the City as one of the few structures of early adobe construction remaining and embodies the almost vanished architectural type adobe construction method. The Adobe and the Market also reflect the social and economic history of the City with their association with one of the original Mexican land grants and with several prominent families—Rocha, Thompson, Hancock and Gilmore.⁷

III. DESCRIPTION OF PROPOSED PROJECT

The Project is described in the introduction to the DEIR as follows:

The TVC 2050 Project (Project) would establish the TVC 2050 Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 25-acre Television City studio located at 7716-7860 West Beverly Boulevard in Los Angeles, California (Project Site). The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout, as well as associated circulation improvements, parking, landscaping, and open space. More specifically, the Specific Plan would permit up to 1,626,180 square feet of new development, the retention of up to 247,820 square feet of existing uses, and the demolition of up to 495,860 square feet of existing media production facilities. The designated Historic-Cultural Monument (HCM) No. 1165 (CHC-2018-476-HCM) located on-site would be retained and rehabilitated as part of the Project. In addition, a Sign District would be established to permit studio specific on-site signage. Construction would require an estimated 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill and up to 772,000 cubic yards of export, with a maximum excavation depth of approximately 45 feet.

IV. HISTORICAL BACKGROUND ON GILMORE ADOBE AND FARMERS MARKET

The following historical overview is summarized from the book, *A Family's Vision—Spanning Three Centuries: The History of the A.F. Gilmore Company*:⁸



Fig 1: Gilmore Adobe, east façade, view northwest c. 1912 (courtesy A.F. Gilmore Co.); Fig 2: Gilmore Adobe, west façade, view northeast, c. 1912 (courtesy A.F. Gilmore Co.)

The Rancho La Brea originated as a 4,439-acre Mexican land grant given in 1828. In 1852, James Thompson built the existing Gilmore Adobe (La Casa de Rancho La Brea) for use as a residence. The adobe became the Gilmore family home in 1883, expanded by A.F. Gilmore to include four additional rooms.

In 1890, A.F. Gilmore took title to the Rancho La Brea property and used it as a dairy farm. He discovered oil on his land in 1901; by 1905, oil rigs replaced the dairy herds. Los

Angeles was growing rapidly during this time and the oil fields were soon surrounded by new development. City zoning laws in the 1920s prohibited large scale oil extraction in residential areas and drilling on the Gilmore property largely ended, with oil fields gone by the early 1930s.

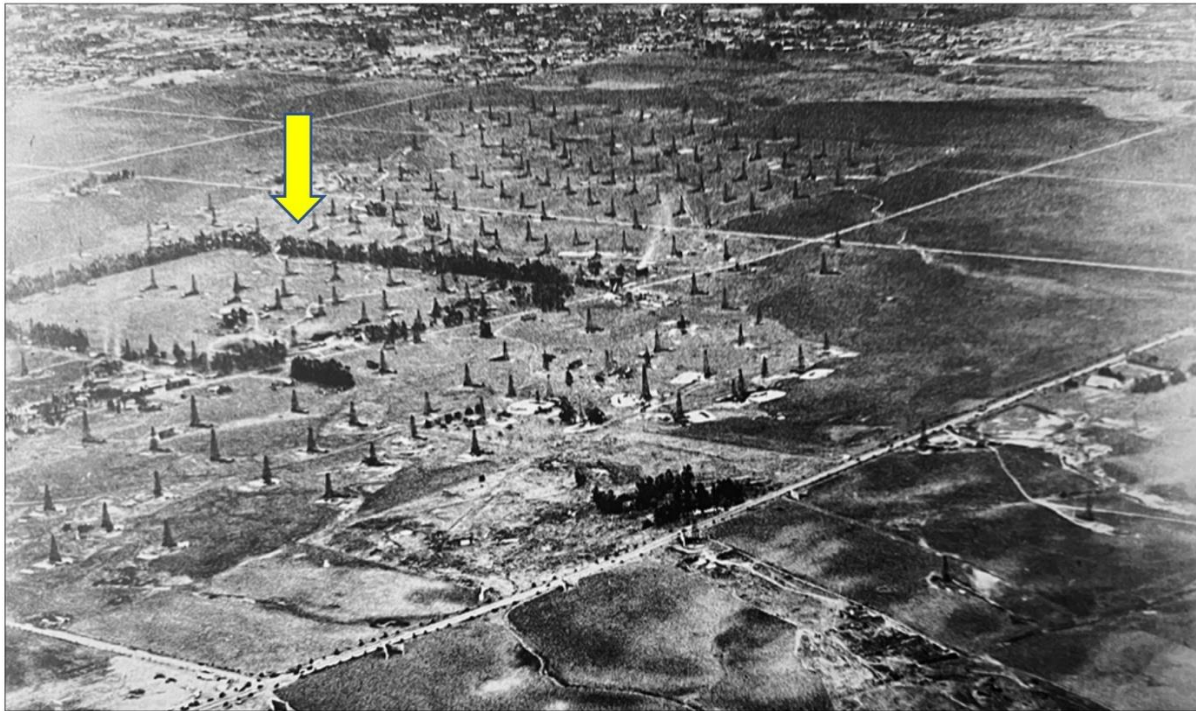


Fig 3: Gilmore property covered with oil fields, c. 1920 (courtesy of A.F. Gilmore Company)

In the 1930s and 1940s, the Gilmore property was developed as “Gilmore Island,” a reference to the fact that it was island-like, surrounded by residential development. The Gilmore family envisioned the property as an entertainment destination, constructing the Gilmore Stadium, a racetrack that was also home to rodeos, boxing, and football; Gilmore Field, a baseball field; the Pan Pacific Auditorium; and the Farmers Market, which opened in 1934 as a place for local farmers to sell their goods. In 1940, the Gilmore Drive-In theater opened. Gilmore Stadium and Gilmore Field closed in the 1950s, replaced in 1952 by CBS Television City (where the Project Site is located). Plans for development of a new shopping center that would become an expanded version of the Farmers Market as well as The Grove began in the 1980s, though they were not realized until 2002 when the new development opened. The Adobe was seismically strengthened in 2015. Throughout the wide range of development and varied land uses, the Gilmore Adobe has remained as a residence with open spaces and landscaping, separate from The Grove and surrounding development, and ensconced in trees.

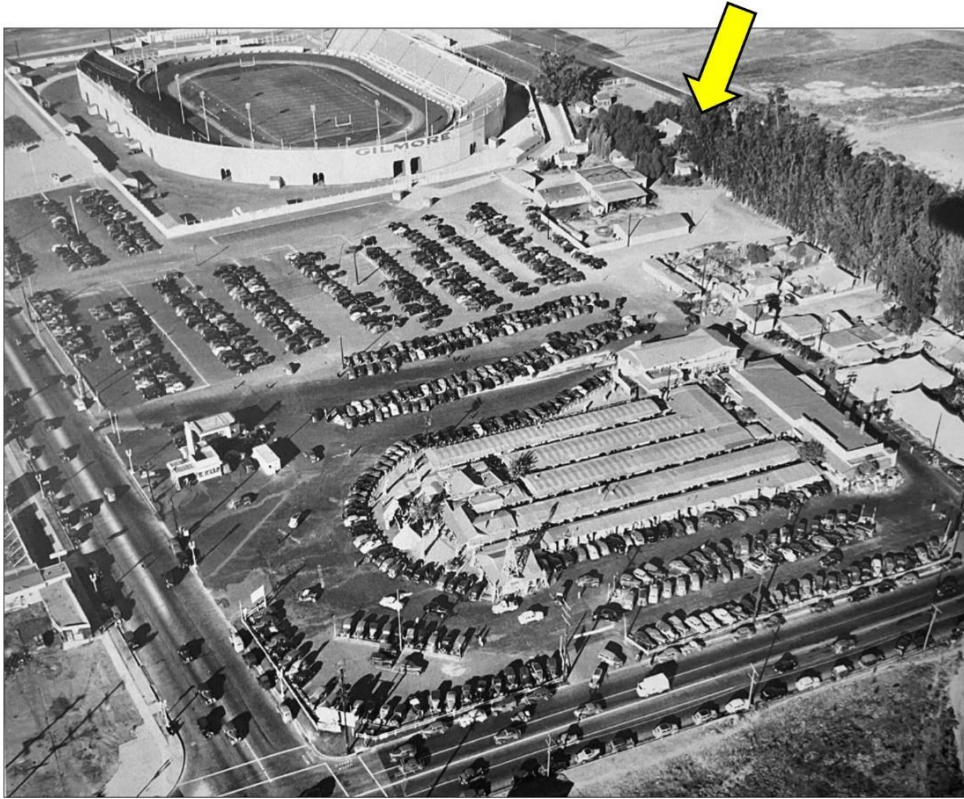


Fig 4: Gilmore property developed with adobe (indicated by arrow), Gilmore Stadium (top left), and Farmers Market (bottom-center), c. 1940 (courtesy of A.F. Gilmore Company)



Fig 5: Rows of Eucalyptus trees extending south of Gilmore Adobe, view north, early view, undated (courtesy of A.F. Gilmore Company)

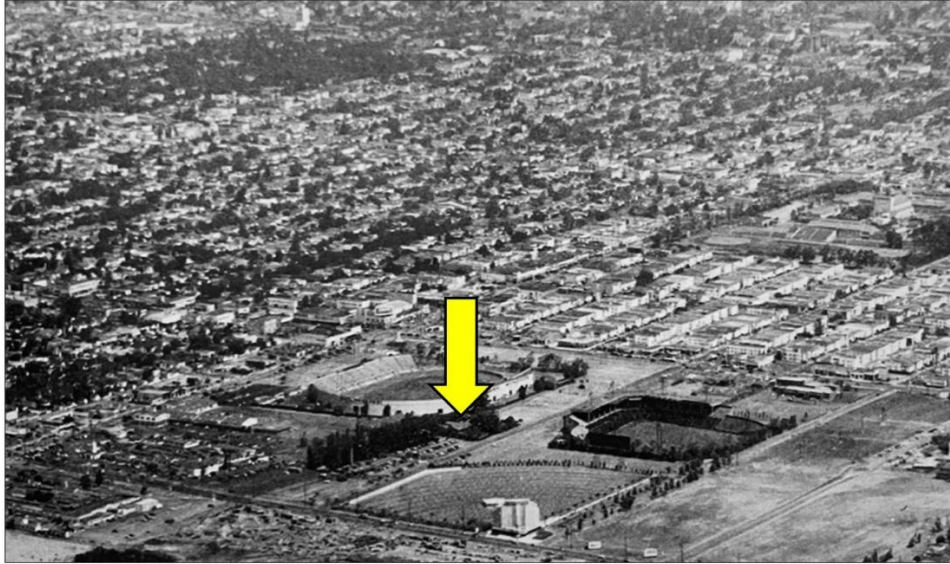


Fig 6: Gilmore Adobe (indicated by arrow), c. 1948 (courtesy of A.F. Gilmore Company)



Fig 7: Gilmore Adobe (indicated by arrow), during construction of CBS, early 1950s (courtesy of A.F. Gilmore Company)



Fig 8: Gilmore Adobe (indicated by arrow), during construction of The Grove, c. 2000 (courtesy of A.F. Gilmore Company)

V. EXISTING CONDITIONS AT GILMORE ADOBE

The Gilmore Adobe and its immediate surroundings include historic and contemporary buildings and landscape features. The following site plan and photographs provide an overview of existing conditions.



Fig 9: Current aerial of adobe property with buildings and landscape features identified (base map: Google Earth)



Fig 10: Adobe, from east yard, view west



Fig 11: Adobe (right) and east yard (left), view south



Fig 12: Gilmore Adobe, view southeast



Fig 13: Apartment, view southwest



Fig 14: Vegetation between Gilmore Adobe (left) and Apartment (right); Fig 15: Orchard, view north



Fig 16: North Yard (west end), view north right



Fig 17: North Yard (center), view north, Archive at far right



Fig 18: North Yard, view east, Archive at center/left Fig 19: North Yard, view east, Cottage at center



Fig 20: Women's Bathroom, view west



Fig 21: Men's Bathroom, view northwest



Fig 22: Shop Building, view east



Fig 23: Admin/Office Building, view west

VI. THRESHOLDS FOR DETERMINING SIGNIFICANCE OF IMPACTS

California Environmental Quality Act (CEQA) Statutes

According to the CEQA Guidelines, a project would result in a significant impact to historical resources if it would cause a substantial adverse change in the significance of an historical resource. A *substantial adverse change* is defined in CEQA Guidelines Section 15064.5(4)(b)(1), as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the *significance of an historical resource would be materially impaired.*” The significance of an historical resource is materially impaired, according to CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to §5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of §5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.⁹

CEQA Guidelines also specify a means of evaluating the relative significance of project impacts on historical resources. CEQA Guidelines Section 15064.5(b)(3) states:

Generally, a project that follows the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (*Secretary’s Standards*, Weeks and Grimmer, 1995), shall be considered as mitigated to a level of less than a significant impact on the historical resource.¹⁰

Similarly, the City’s Cultural Heritage Ordinance provides that compliance with the *Secretary’s Standards* is part of the process for review and approval by the Cultural Heritage Commission of proposed alterations to Historic-Cultural Monuments (see Los Angeles Administrative Code Section 22.171.14.a.1).

The City of Los Angeles 2006 publication *LA CEQA Thresholds Guide* identifies the following thresholds for determining if the project will result in a significant impact:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Secretary of the Interior's Standards for Treatment of Historic Properties

The *Secretary's Standards* consist of four treatments, the most common of which is rehabilitation, which is defined as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” The rehabilitation standards are:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible,

materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The *Secretary's Standards* are intended to be flexible and adaptable to specific project conditions to balance change while retaining historic building fabric to the maximum extent feasible. The National Park Service has created a substantial amount of written guidance, most of it available online, including Illustrated Guidelines for Rehabilitating Historic Buildings, Preservation Briefs, Preservation Tech Notes, and Interpreting the Standards Bulletins (ITS).

- ¹ *National Register Bulletin #16A: How to Complete the National Register Registration Form*, National Park Service, 1997.
- ² *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, National Park Service, 1990, revised 2002.
- ³ *National Register Bulletin #15*.
- ⁴ California Public Resources Code §5024.1(a).
- ⁵ *Cultural Heritage Masterplan*, City of Los Angeles Cultural Affairs Department, adopted 2000: 44, www.preservation.lacity.org.
- ⁶ *Ibid.*, 45.
- ⁷ File No. 91-0496, Arts, Health & Humanities Committee Report to Council of the City of Los Angeles to a request from the Cultural Heritage Commission to include the Farmers Market in the list of Historic-Cultural Monuments, June 26, 1991.
- ⁸ *A Family's Vision—Spanning Three Centuries: The History of the A.F. Gilmore Company*, A.F. Gilmore Company, February 2018.
- ⁹ CEQA Guidelines §15064.5(4)(b)(2). Emphasis added.
- ^s CEQA Guidelines §15604.5(b)(3).

Response to Comment No. 363-1

This comment includes an introductory comment and a description of the regulatory setting, Project, the commenter's summary of the historical background on the Gilmore Adobe and The Original Farmers Market, the commenter's summary of existing conditions at the Gilmore Adobe, and thresholds for determining significance of impacts.

This comment asserts that the Draft EIR fails to adequately analyze, disclose, and acknowledge direct and indirect impacts on the historical resources to the south, which include the Gilmore Adobe and The Original Farmers Market. The commenter also asserts that the Draft EIR fails to adequately analyze, disclose, and acknowledge indirect impacts on several "adjacent" and "nearby" historic districts. As discussed in detail in Response to Comment Nos. 363-2 to 363-3, the commenter's assertions about the adequacy of the Draft EIR's analysis are incorrect. These claims are not grounded in Appendix G of the CEQA Guidelines that establish the thresholds for significant impacts to historical resources or historic preservation principles and standards established by NPS. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, as well as Response to Comment No. 28-29 regarding the application of the Rehabilitation Standards.

The comment includes a historical background regarding the Gilmore Adobe and The Original Farmers Market. While this background information adds additional historic context for the area surrounding the Project Site, it does not provide any salient additional information necessary for analyzing potential impacts as defined by CEQA. The comment focuses on the continued development and redevelopment of the properties surrounding the Gilmore Adobe and The Original Farmers Market. Historic photos provided by the commenter illustrate the substantial changes that have occurred in the area surrounding the property since 1920, which provides additional evidence that supports the conclusion in the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR) that, while the immediate setting of the Gilmore Adobe property may be a character-defining feature of the Gilmore Adobe, the broad setting outside the Gilmore Adobe property is not a character-defining feature because it has been substantially altered over time.

Within the portion of this comment that describes the existing conditions at the Gilmore Adobe, the overview and mapping of the Gilmore Adobe property's existing conditions illustrates that only four buildings, including the Gilmore Adobe itself, can be considered extant from a recognized historic period (mid-19th century to the early-20th century). Three landscape areas, although undated, are also called out and considered character-defining features. The map calls out an additional four buildings dating from the first decade of the 21st century. However, the comment letter does not identify the three additional buildings immediately adjoining the Gilmore Adobe property to the east and west, which are commercial buildings that appear to date from the construction of The

Grove shopping and entertainment development. Despite the more recent development both on and immediately adjacent to the Gilmore Adobe property, the comment incorrectly asserts that the integrity of the Gilmore Adobe's historic setting (confined to the Gilmore Adobe property only) is "largely intact." In addition, Figure 9 of this comment incorrectly identifies Building Nos. 2 and 5 as apartments. As discussed in the Historic Report, the Gilmore Adobe property was substantially remodeled by Gilmore for use as a family home and continued to be used as a residence by subsequent generations of the Gilmore family until 1976.¹⁵⁶

Comment No. 363-2

VII. DEFICIENCIES OF DRAFT EIR

Direct Impacts on Gilmore Adobe

The DEIR fails to adequately analyze potential direct impacts of construction vibration on the structure of the 170-year-old Gilmore Adobe.

The adobe was constructed in 1852 of adobe brick finished in stucco. The HCM designation provides the following regarding the adobe structure:

The Gilmore (Rancho La Brea) Adobe has particular historic and cultural significance to the City as one of the few structures of early adobe construction remaining and embodies the almost vanished architectural type adobe construction method.¹¹

Underscoring the historic significance of adobe construction, the National Park Service published guidance on the preservation of adobe in *Preservation Brief 5: Preservation of Historic Adobe Buildings*.¹² Adobe is a fragile building material; as such, impacts could result from pile installation and vibration during construction of the Project. This is supported by another National Park Service publication, *Preservation Tech Note No. 3: Protecting a Historic Structure During Adjacent Construction*, which states, "Historic structures may be particularly vulnerable to the effects of vibrations generated at an adjacent site," and "may experience corresponding displacement that can result in major structural damage."¹³

¹⁵⁶ The Gilmore Adobe has been a commercial office use since 1976. This is verified by the 2018 book, *A Family Vision—Spanning Three Centuries—The History of the A.F. Gilmore Company*, written by the A.F. Gilmore Company and the certified Addendum to the Final Environmental Impact Report for The Grove at Farmers Market Project dated July 15, 1999 (EIR No. 87-515-SUB(ZV)(YV)(ZC); State Clearinghouse No. 87102102).

The DEIR briefly addresses potential impacts from vibration in Chapter IV.1: [sic] Noise. This chapter acknowledges off-site historical resources including the adobe as “buildings extremely susceptible to vibration damage” and states that “the estimated vibration levels from the construction would be well below the 0.12-PPV building damage significance criterion at the five off-site historical resources.”¹⁴ However, the data tables included in the associated technical report provide that the adobe will be 100 feet from construction equipment including: large bulldozer, caisson drilling, loaded trucks, jackhammer, and small bulldozer. The cultural resources technical report excludes mention of any potential impacts from pile installation and/or vibration on the adobe.

The DEIR fails to describe the existing condition of the adobe brick and its potential susceptibility to vibration. The DEIR also fails to substantiate its asserted 0.12-PPV ‘significance criterion’ as pertains to what the DEIR acknowledges as a “building extremely susceptible to vibration damage,” and fails to contain an analysis of the vibration impacts of the operation of the construction equipment described as operating within 100 feet of the adobe.

As provided in *Preservation Tech Note No. 3: Protecting a Historic Structure During Adjacent Construction*, there should be “Early consultation between the historic property owner and the developer of the neighboring construction site” as the “first and often most important step” to protecting an historic building like the adobe during adjacent construction; and, a “consulting engineer should ensure that the selected approach addresses the unique characteristics and vulnerabilities of the historic structure and that even incidental movement is restricted.”¹⁵ These essential steps to protect the adobe should be undertaken. An evaluation of potential impacts of vibration on the adobe by a structural engineer with experience working on adobe structures should be prepared and included in a revised and recirculated DEIR, disclosing potential impacts and identifying necessary mitigation measures. The adobe’s method of construction is one of the primary reasons for its significance. It is strongly recommended that a plan be made to ensure protection and monitoring of the adobe during construction.



Fig 24: Current aerial showing location of Project Site, Gilmore Adobe, and Farmers Market

- ¹¹ File No. 91-0496, Arts, Health & Humanities Committee Report to Council of the City of Los Angeles to a request from the Cultural Heritage Commission to include the Farmers Market in the list of Historic-Cultural Monuments, June 26, 1991.
- ¹² Lee H. Nelson, "Preservation Brief 5: Preservation of Historic Adobe Buildings," U.S. Department of the Interior, National Park Service, Cultural Resources, August 1978.
- ¹³ Chad Randl, Technical Preservation Services, National Park Service, "Preservation Tech Note No. 3: Protecting a Historic Structure During Adjacent Construction," July 2001:4.
- ¹⁴ TVC 2050 Project, Draft EIR, Chapter IV.1: [sic] Noise, Page IV.1-59. [sic]
- ¹⁵ Chad Randl, Technical Preservation Services, "Preservation Tech Note No. 3: Protecting a Historic Structure During Adjacent Construction," National Park Service, July 2001:4.

Response to Comment No. 363-2

The commenter claims that direct impacts from vibration due to construction activities are not properly analyzed and vibration from construction has the potential to directly impact the Gilmore Adobe given the general fragility of adobe as a building material, which is incorrect. As discussed in Response to Comment No. 5-13, the nearest buildings within the Project Site would be located approximately 167 feet from the Gilmore Adobe, and construction activities would be located a minimum of approximately 125 feet from the Gilmore Adobe, which would be separated by existing buildings to the north of the Gilmore Adobe as well as a service alley used by Gilmore vehicles and trucks. To evaluate potential vibration impacts to the Gilmore Adobe, Section IV.I, Noise, of the Draft EIR used the most stringent criterion of 0.12 PPV for "buildings extremely susceptible to vibration damage" from the FTA. This criterion is even more stringent than FTA's 0.20 PPV criterion for "non-engineered timber and masonry buildings." As such, the fact that the Gilmore Adobe includes a brick structure is fully accounted for in the vibration analysis.

Furthermore, to be conservative, the analysis in the Draft EIR assumed that construction equipment would be located within 100 feet of the Gilmore Adobe. In addition, as stated in the Draft EIR (page IV.I-60), installation of piles for shoring and foundations would utilize drilling methods to minimize vibration generation, and no impact pile driving would occur as set forth by Project Design Feature NOI-PDF-2. Contrary to the statement in this comment, no heavy construction equipment would be operated within 100 feet of the Gilmore Adobe. As shown in Table IV.I-20 of the Draft EIR, the maximum vibration level associated with construction equipment would be 0.011 PPV, which is well below the 0.12 threshold for building damage for the most stringent FTA threshold of 0.12 PPV. Furthermore, the estimated maximum vibration level at the Gilmore Adobe (0.011 PPV) would be well below Caltrans' most stringent vibration criteria of 0.08 PPV, applicable to "extremely fragile historic buildings, ruins, ancient monuments." As such, AES, a licensed mechanical engineer with over 30 years of experience in evaluating construction noise and vibration impacts, has concluded that a monitoring plan or structural engineering plan during construction is not required. Generally, vibration monitoring would be provided when the estimated vibration levels would exceed or approach the vibration threshold (i.e., 0.12 PPV for buildings extremely susceptible to vibration damage). Also note that the analysis of vibration impacts is appropriately included in Section IV.I, Noise, of the Draft EIR in accordance with Appendix G of the of the CEQA Guidelines where the questions regarding vibration are included under the noise topic.

Comment No. 363-3

Indirect Impacts on Gilmore Adobe

The DEIR fails to adequately analyze, disclose, and acknowledge potential significant and unavoidable adverse impacts on the setting of the Gilmore Adobe.

In general, CEQA describes an indirect impact as one that results from the "...alteration of the resource or its *immediate surroundings* such that the significance of an historical resource would be materially impaired" (emphasis added—CEQA Guidelines §15064.5(b)(1)). Therefore, whether the proposed project would impact the *setting* of a resource must be studied.

Setting is defined by the National Park Service as follows:

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.¹⁶

Setting is an important aspect of integrity for the Gilmore Adobe. The property has always been defined by its relationships between buildings and open space, and its vegetation. The landscaping consists of front, back, and side yards, an orchard, mature trees, and a range of plantings. Historic photographs (Figs 1–8) clearly show the Gilmore Adobe property as a distinct grouping of buildings ensconced in trees, with a sense of separation and seclusion from surrounding development.

The adobe and its isolated setting are described in an historic photo description on file in the California Historical Society Collection held at USC as “shielded from public view by a fortress of foliage” and “as a bucolic island of tranquility in the heart of the city.”¹⁷

Over time, the surrounding development has included a wide range of land uses, as oil fields scattered with derricks, single- and multi-family housing, a car racing stadium and gas stations, a baseball park, the Farmers Market, and The Grove shopping center.

Images of Gilmore Adobe appear in the Historic American Building Survey Collection held by the Library of Congress. The significance statement associated with these records emphasizes the uniqueness of this property amidst dramatic changes to the broader landscape associated with the original Rancho La Brea land grant:

The history of the house, as simple and straightforward as the lines of its construction, contrasts dramatically with the complex development of the surrounding ranch lands it once governed. It has changed hands only twice and has

retained its original function without interruption, while most of the 44 hundred acres granted in 1828 to Antonio Jose Rocha have lost identity beneath the grid of city streets.¹⁸

Despite these changes to the broader landscape, surrounding land uses have always maintained distance from and not encroached on the property.

While the HCM designation asserts the property's significance for association with local developmental history as well as the Gilmore family, an association that has continued over time to present day. As such, the period of significance for the property appears to extend well beyond the date of construction in 1852, continuing through the mid-twentieth century, as the property and Gilmore family continued to have a substantial influence on local history and development during this timeframe.

Finally, the Gilmore adobe property and its outdoor spaces have long been an important gathering space for not only the Gilmore family but also various community groups. The family regularly allows community groups to utilize the outdoor spaces for events.



Fig 25: *Gilmore Adobe, Daughters of the Golden West event, view southeast, 1935 (courtesy of A.F. Gilmore Company)*

¹⁶ *National Register Bulletin #15, How to Apply the National Register Criteria for Evaluation*, National Park Service, 1990, revised 2002:44.

¹⁷ "Gilmore Adobe on Rancho La Brea," call no. CHS-10075, California Historical Society Collection, Title Insurance and Trust and C.C. Pierce Photography Collection 1860–1960, USC Digital Library, <https://>

digitallibrary.usc.edu/asset-management/2A3BF1QBQBQ?FR_=1&W=1282&H=692, accessed September 6, 2022.

- ¹⁸ “Rancho La Brea Adobe, 6301 West 3rd Street, Los Angeles, Los Angeles County, CA,” Historic American Building Survey, call number: HABS CAL,19-LOSAN,26-, Library of Congress Prints and Photographs Division Washington, D.C. 20540 USA, <https://www.loc.gov/pictures/item/ca0248/>, accessed September 6, 2022.

Response to Comment No. 363-3

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment Nos. 5-13 and 26-47 regarding the Draft EIR’s comprehensive analysis of potential impacts to the Gilmore Adobe. As discussed therein, only the immediate setting, contained within the Gilmore Adobe property boundary, contributes to the historic significance of the Gilmore Adobe. The immediate setting would be unaffected by the Project because it would not involve demolition, destruction, relocation, or alteration within the boundary of the Gilmore Adobe property. The broad setting of the Gilmore Adobe was emphasized in the Draft EIR because that is where the Project Site is located, which is where all demolition, alteration, and new construction associated with the Project would take place. The broad setting has been continually altered by successive development and redevelopment after the Gilmore family took residence in the late 19th century, with development of The Grove shopping and entertainment center beginning in 2002 as the most recent example. The Project would not involve any physical changes within the boundary of the Gilmore Adobe property. As discussed in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), the broad setting does not contribute to the significance of the Gilmore Adobe because it no longer contains any direct physical association to the Gilmore Adobe; the relevant features of the setting are limited to the Gilmore Adobe property. This point is reiterated by the commenter who states that “[t]hroughout the wide range of development and varied land uses, the Gilmore Adobe has remained as a residence with open spaces and landscaping, separate from The Grove and surrounding development, and ensconced in trees.” Please note that, as discussed in Response to Comment No. 363-1, the Gilmore Adobe has not been a residential use since it was converted to Gilmore offices around 1976.

The commenter’s claim that “surrounding land uses have always maintained distance from and not encroached on the property” is not factually correct. New commercial and support uses enclose the Gilmore Adobe property to the east, west and north. Further, the nearest buildings within the Project Site would be located approximately 167 feet or more from the Gilmore Adobe, which is much farther away from the Gilmore Adobe than the newer buildings that have been built immediately adjacent to the Gilmore Adobe within the Gilmore/The Grove property. The buildings directly north of the Gilmore Adobe would separate the Gilmore Adobe from new buildings on the Project Site. Thus,

the commenter's statement that the Project will introduce new construction "adjacent" to the Gilmore Adobe is incorrect.

Comment No. 363-4

The Project would adversely impact the setting and functionality of the Gilmore Adobe by introducing a potentially dramatic increase in the scale of new construction adjacent to the adobe. Existing CBS buildings within approximately 150 feet north of the Adobe complex respect the special setting of the Adobe, and are limited to one story in height. The Project would allow buildings up to 225 feet in height within the same area setback by only 30 feet from the property line.¹⁹ Existing CBS buildings to east of the Adobe complex similarly respect the special setting of the Adobe, are substantially set back by approximately 150 feet, and are limited to one story in height. The Project would allow buildings up to 130 feet in height in the same area setback by only approximately 60 feet from the property line.²⁰ Allowing out-of-scale construction in such areas as proposed by the Project would create a wall that overshadows the low-scale adobe, especially the open spaces and north yard, a primary location for Gilmore family and community gatherings, and would entirely block out access to light and air in this area, significantly and adversely impacting the historic look and feel of the setting. The DEIR is fundamentally defective for failing to disclose and acknowledge this significant environmental impact.

Significant adverse impacts to the Adobe setting would not be avoided by limiting building height to the 88' "base height" (approximately 103' tall as measured in accordance with LAMC requirements) within the same areas characterized by open space and one-story structures, as they would similarly block out access to light and air in the Adobe complex.

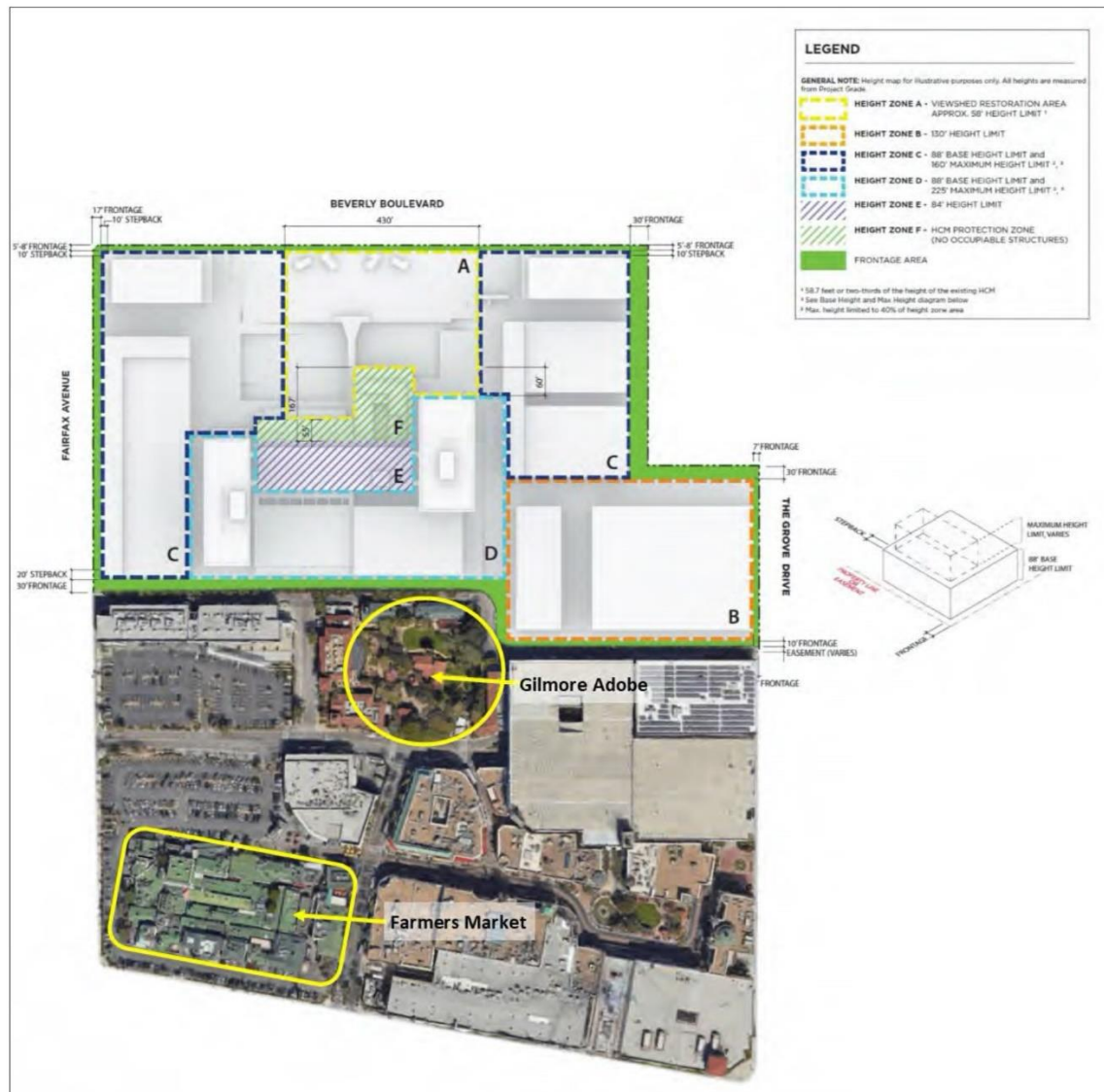


Fig 26: Massing and height zone diagram from DEIR with current aerial superimposed showing Gilmore Adobe and Farmers Market

The DEIR fails to address these potential impacts on setting, first by excluding a description of the setting of the adobe and its landscape features from the cultural resources technical report. The physical description is limited to the following:

Located directly south of the Project Site, The Original Farmers Market property was originally a portion of the Rancho La Brea land grant. The property includes the Rancho La Brea Adobe (generally referred to as the Gilmore Adobe), which was originally constructed in 1852. It was substantially remodeled by Gilmore for use as a family home and continued to be used as a residence by subsequent generations of the Gilmore family until 1976. The one-story building with cross-gabled red tile roof is located south of the Project Site.²¹

Second, the DEIR inadequately addresses the issue of potential impacts on setting by stating that the setting of the property has already been changed by construction of The Grove. The associated cultural resources technical report states the following:

Integrity of *setting* for both resources have been substantially altered previously by construction of The Grove shopping and entertainment center in 2002, and neither The Original Farmers Market nor the Rancho La Brea Adobe retains integrity of setting.²²

This analysis is entirely conclusory and incomplete. Nor is it supported by any of the technical reports contained in Appendix C of the DEIR (Cultural and Tribal Resources). Despite the development of The Grove, the adobe exists as a secluded oasis ensconced in landscaping and trees. Adjacent development is primarily one and two stories in height and well-buffered from the Adobe (The Grove Parking Structure being the exception). Thus, the integrity of the Adobe's historic setting is largely intact and should be protected to avoid a significant adverse impact to the adobe complex as an historical resource.

The below diagrams (Figs 27–29) prepared by the A.F. Gilmore Company demonstrate the full extent of the scale and height of the Project based on the proposed height zones and show that the construction nearest the adobe would dwarf and substantially overhang that building and its open spaces.



Fig 27: Massing diagram showing Project in relation to Gilmore Adobe, view north



Fig 28: Massing diagram showing Project in relation to Gilmore Adobe, view north

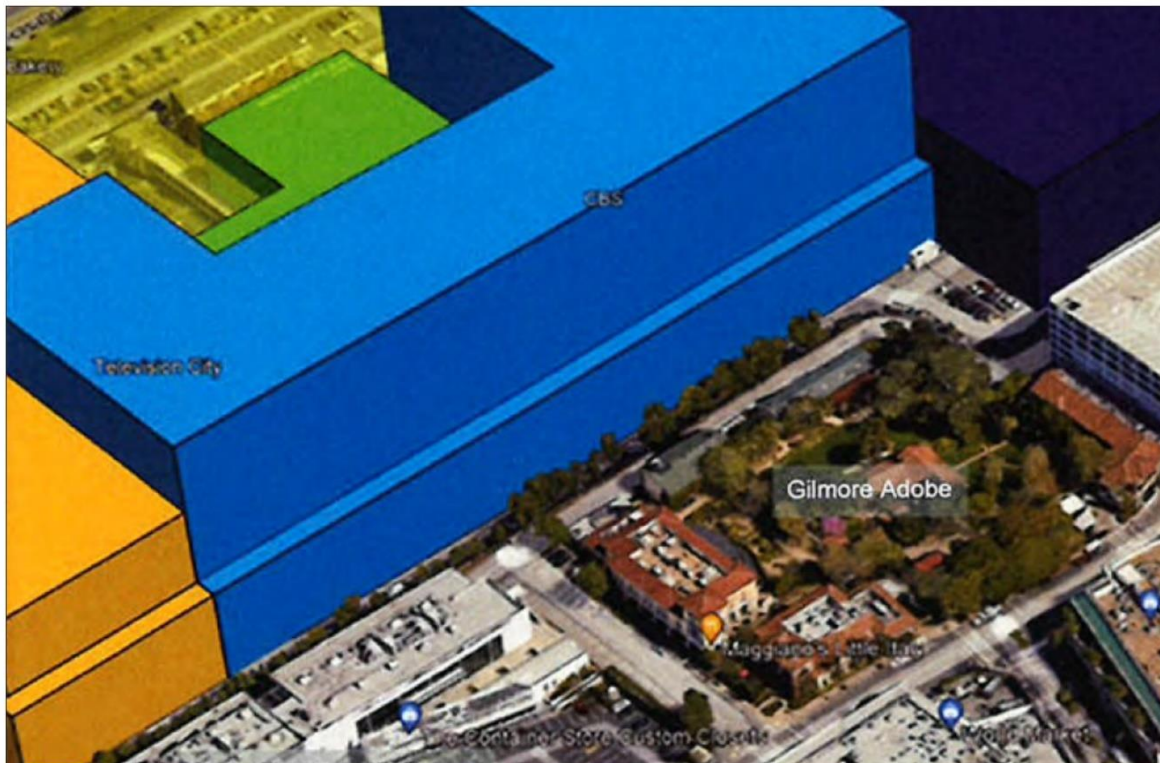


Fig 29: Massing diagram showing Project in relation to Gilmore Adobe, view northeast

- ¹⁹ The actual height of such buildings may be as much as 15' taller when measured in accordance with LAMC requirements.
- ²⁰ Ibid.
- ²¹ Historic Resources Group, Historical Resources Technical Report TVC 2050 Project, May 2022: 39-40.
- ²² Historic Resources Group, Historical Resources Technical Report TVC 2050 Project, May 2022: 88.

Response to Comment No. 363-4

This comment is similar to Comment No. 28-29. Refer to Response to Comment No. 28-29. As discussed therein, the claims that the Project would result in a significant impact to the Gilmore Adobe because it would be out of scale, overshadow, block access to light and air, etc., is not substantiated by facts or analysis and is not based on the threshold in Appendix G of the CEQA Guidelines. This comment does not provide any explanation as to what aspects of the immediate surroundings are instrumental in conveying the historic significance of this historical resource or how new construction located north of the Gilmore Adobe would diminish its integrity.

As discussed in Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, impacts to aesthetics are based on different criteria and thresholds than those used for historical resources. This comment incorrectly conflates aesthetic and historic impacts. The differences between these two types of impacts are discussed in detail in Response to Comment Nos. 26-E.2-8 and 26-E.2-63.

Refer to Response to Comment No. 5-13 regarding the height limits under the proposed Specific Plan and the inaccuracies of the massing diagrams included in this comment (Fig 27-29). Refer to Response to Comment Nos. 5-13, 5-14, 11-3, 26-7, and 28-22 regarding the size and scale of the Project.

Comment No. 363-5

The Project is not in conformance with Standard 9 of the *Secretary's Standards*, which specifically addresses new construction and states the following:

New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property *and its environment* (emphasis added).

The DEIR fails to discuss that the new construction proposed by the Project does not meet Standard 9 in that (i) it would destroy spatial relationships that characterize the adobe as a historic property, and (ii) that its size, scale and proportion, and its massing fails to protect the integrity of the Project's environment (specifically the adobe complex). Accordingly, the DEIR should be revised and recirculated to acknowledge this significant adverse impact and identify potential mitigation measures.

Response to Comment No. 363-5

This comment incorrectly invokes Standard 9 of the Rehabilitation Standards to support the claim that new construction associated with the Project would result in a significant indirect impact to the Gilmore Adobe. As discussed in Response to Comment No. 28-29, while conformance with the Rehabilitation Standards are a safe harbor for avoiding significant impacts under CEQA, they are not the threshold for significant historical resource impacts. Furthermore, Standard 9 is concerned with additions, exterior alterations, or related new construction to a historical resource. However, the Project does not propose any addition or exterior alterations of any of the component buildings, structures or landscape areas that comprise the Gilmore Adobe property itself. The Project Site is a separate property that has had no association with the Gilmore Adobe property. As such, the Project does not represent *related new construction*, as there is no relationship between the two properties other than proximity. Therefore, Standard 9 does not apply. The Secretary of the Interior's Standards provide general guidance on the rehabilitation of historical resources. They are not intended to limit or control development on separate properties near historical resources, particularly if there is no historical association between the two properties.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 363-6**Indirect Impacts on Historical Use of Farmers Market**

Potential impacts from the Project on the historic use of the Farmers Market were not considered in the DEIR. The Farmers Market depends on support from the Shop Building along the north end of the property near the Project (see Figs 30-31), which necessitate open access to the road/alley to the north. All materials to support the Farmers Market and adjacent company-owned properties are loaded through this alley; loading activities only leave sufficient clearance for fire access. Thus, an increase in traffic would mean service vehicles may not have clearance to safely load and unload vehicles while maintaining an adequate fire lane; slow-moving service equipment (man lifts, scissor lifts, forklifts, etc.) regularly travel down the alley would also be interrupted by an increase in traffic. As the Project proposes to intensely utilize this road, which would disrupt the necessary Farmers Market support services in this location, it would therefore impede on the ability of the HCM to maintain its historic, significant use as a fully functioning, open-air market.



Fig 30: Shop Building (right), view east



Fig 31: Interior of Shop Building showing workshop servicing Farmers Market

Based on this analysis, the Project is not in conformance with the *Secretary's Standards*. Standard 1 is most relevant here as it specifically addresses the importance of maintaining historical use and states the following:

A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Disruption of the historic use of the Farmers Market does not meet Standard 1.

Indirect Impacts on Adjacent and Nearby Historic Districts



Fig. 32: Current aerial showing historic districts near the Project Site

The Project is located near three historic districts (see Fig 32):

1. The National Register-listed Beverly Fairfax Historic District, a largely multi-family residential district, designated in 2018, significant for its collection of period revival homes and association with the Jewish American community.²³ The district includes 463 single- and multi-family dwellings of which 366 are contributing, and is roughly bounded by Melrose Avenue to the north, Gardner Street to the east, Rosewood Avenue to the south and Fairfax Avenue to the west.
2. The potential Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District, found eligible for listing in the National Register in SurveyLA, the City of Los Angeles Citywide Historic Resources Survey, in 2015, and significant for its collection of period revival homes.²⁴ The district includes 380 parcels, 332 of which contribute to its significance, and is roughly bounded by Rosewood Avenue to the north, Gardner Street to the east, Beverly Boulevard to the south, and Fairfax Avenue to the west.

3. The Miracle Mile North HPOZ, a primarily single-family residential district adopted in 1990, significant for its collection of period revival homes and as an automobile suburb.²⁵ The district includes 598 parcels, 547 of which contribute to its significance, and is roughly bounded by Beverly Boulevard to the north, La Brea Avenue to the east, 3rd Street to the south, and Gardner Avenue to the west.

²³ “Beverly Fairfax National Register Nomination,” Los Angeles Conservancy, <https://www.laconservancy.org/beverly-fairfax-historic-district-national-register-nomination>, accessed September 6, 2022.

²⁴ Historic Places LA, <http://www.historicplacesla.org/reports/97f3d430-01f5-497c-917a-3b95209d5ae0>, accessed September 6, 2022.

²⁵ “Miracle Mile North Historic Preservation Overlay Zone,” Los Angeles City Planning, <https://planning.lacity.org/preservation-design/overlays/miracle-mile-north>, accessed September 6, 2022.

Response to Comment No. 363-6

This comment is substantially similar to Comment No. 28-31. Refer to Response to Comment No. 28-31.

This comment incorrectly invokes the Rehabilitation Standards, claiming that because the historic use of The Original Farmers Market as an open-air market would not be maintained (which is the commenter’s opinion and is not supported by facts or evidence), the Project would not comply with Standard 1, which addresses the use of a historic property when that property itself is being rehabilitated. However, the commenter misapplies Standard 1, which is as follows:

*Standard 1: A property shall be used for its historic purpose **or be placed in a new use** (emphasis added) that requires minimal change to the defining characteristics of the building and its site and environment.¹⁵⁷*

Standard 1 does not mandate continued historic use; rather, it requires that if a new use is deemed necessary, that use will not require substantial physical change to the historical resource. More importantly, the Project does not propose to rehabilitate The Original Farmers Market, as the Project is limited to the Project Site. Therefore, the Rehabilitation Standards, including Standard 1, are not applicable.

Contrary to the unsupported claims in this comment, the Project will not change or affect the use of The Original Farmers Market. The assertions in this comment regarding historical use are the opinion of the commenter and are not substantiated by facts or

¹⁵⁷ 36 CFR Part 67.7.

analysis, nor do they relate to the threshold for significant impacts to historical resources under Appendix G of the CEQA Guidelines. As demonstrated in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), The Original Farmers Market, including its component buildings, structures and associated outdoor spaces, would remain physically unchanged after implementation of the Project and it would continue to convey its historic significance. Therefore, impacts to The Original Farmers Market would be less than significant as defined by CEQA.

Comment No. 363-7

The DEIR does not adequately address the potential for impacts on the settings of the above-listed districts. Given the scale of the new construction, impacts on setting should be evaluated. The Project may not conform with Standard 9, which specifically addresses new construction and its impacts on spatial relationships that characterize an historical resource such as an historic district.

The DEIR also fails to consider that the large scale of the Project would fundamentally change the existing character of the area through substantial intensification of traffic, which could cause potentially significant adverse impacts to the above-listed historic districts. The DEIR's transportation assessment states that the Project will subject several key streets of the National Register-listed Beverly Fairfax Historic District in particular, specifically Genesee, Stanley, Oakwood and Rosewood to "excessive traffic burden" due to cut-through traffic caused by the Project. Such intensification could foreseeably lead to indirect impacts of degradation to the historic districts by deteriorating the roadways and character, which should be analyzed and disclosed in the DEIR.

Response to Comment No. 363-7

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 28-19 regarding the Beverly Fairfax Historic District, Orange Grove Avenue-Gardener Street Multi-Family Residential Historic District, and Miracle Mile North HPOZ. As an initial matter, the boundaries of the historic districts shown in Fig. 32 of this comment are inaccurate. The Orange Grove Avenue-Gardner Street Multi-Family Historic District (identified through survey evaluation only) was later subsumed into the larger Beverly Fairfax Historic District which was listed in the National Register in 2018. It is not accurate, therefore, to present the Orange Grove Avenue-Gardner Street Multi-Family Residential Historic District as separate and distinct from the Beverly Fairfax Historic District. Refer to Figure II-15 and Figure II-16 within Response to Comment No. 28-19 for the accurate boundaries of these districts.

The Draft EIR adequately addressed potential impacts to off-site historical resources. As discussed on page IV.B-27 in Section IV.B, Cultural Resources, of the Draft EIR, the Historic Report (Appendix C.1 of the Draft EIR) defines an area surrounding the Project Site where potential direct or indirect impacts could reasonably be expected to occur (i.e., the Project Site vicinity). In determining the Project Site vicinity, the Historic Report considered three factors: (1) the existing setting of the Project Site; (2) the scale and nature of the proposed Project; and (3) the impacts the Project could have on historical resources, if such resources exist. The Historic Report defined the Project Site vicinity as all parcels immediately adjacent to the Project Site, as well as all parcels located directly across the street from the Project Site. Properties beyond the Project Site vicinity were not analyzed because the Project would have no potential to directly or indirectly impact those properties. The western boundary of the Miracle Mile North HPOZ sits more than 800 feet from the easternmost edge of the Project Site and cannot be reasonably considered to be part of its environmental setting under CEQA, nor is there any potential for significant impacts to the Miracle Mile North HPOZ from the Project. Therefore, impacts to the Miracle Mile North HPOZ were not analyzed as part of the Draft EIR. The Beverly Fairfax Historic District also sits beyond the Project Site vicinity. The potential for impacts to the Beverly Fairfax Historic District were addressed in the Historic Report, however, for informational purposes. The Historic Report also discusses the Orange Grove Avenue–Gardner Street Multi-Family Residential Historic District for informational purposes on page 39. As stated in the Draft EIR and Historic Report, there would be no potential for the Project to result in significant impacts as defined by CEQA to these historic districts due to the physical separation and distance between the historic districts and the Project Site.

The comment that impacts to “the settings” of these historic districts would be significant is not representative of historic districts and how they are defined. Industry standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic districts. NPS defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”¹⁵⁸ Thus, a historic district derives its significance as a single unified entity.

Boundaries for historic districts are selected to encompass the single area of land containing the significant concentration of buildings, sites, structures, or objects that contribute to the historic significance of the district and delineate the historic district from immediately surrounding areas of a different historic character or development pattern. NPS guidance on defining historic district boundaries state that boundaries should be drawn by observing the following:

¹⁵⁸ National Park Service, U. S. Department of the Interior, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, 1997.

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new development, highways or development of a different character.
- Visual changes in the character of the area due different architectural styles, types or periods, or to a decline in the concentration of contributing resources.
- Boundaries at a specific time in history such as the original city limits, or the legally recorded boundaries of a housing subdivision, estate, or ranch.
- Clearly differentiated patterns of historic development, such as commercial versus residential or industrial.¹⁵⁹

These tenets can be observed in the historic districts in the general vicinity of the Project Site. All have boundaries to exclude areas of different historic development pattern such as commercial development or areas of later development not associated with the period of significance for the individual district. In this manner, setting features associated with the historic significance of the historic district are necessarily included within the district boundaries. The larger setting located outside the district boundaries are not considered character-defining or important to the integrity of the historic district.

The Project Site is located well outside the boundaries of all of the historic districts in the area (over 200 feet from the Beverly Fairfax Historic District and over 800 feet from the Miracle Mile North HPOZ) and no physical alterations or changes within the boundaries of those historic districts are contemplated by the Project. As such, the Project cannot physically alter or change the setting of any historic district as all the setting features that contribute to the significance of the historic district are contained within its boundaries.

Additionally, the commenter misapplies Standard 9; refer to Response to Comment No. 363-5.

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10 regarding vehicle trips in the Beverly Fairfax Historic District.

¹⁵⁹ National Park Service, U. S. Department of the Interior, National Register Bulletin Defining Boundaries for National Register Properties, revised 1997, p. 12.

Comment No. 363-8**VIII. CONCLUSION**

Based on the issues described in this letter, the Draft EIR for the TVC 2050 Project fails to adequately analyze, disclose, and acknowledge direct and indirect historical resources impacts, especially to the Gilmore Adobe, Farmers Market, and adjacent and nearby historic districts.

Attachment—Kathryn McGee Statement of Qualifications and Résumé [2 pages]

Response to Comment No. 363-8

As demonstrated by Response to Comment Nos. 363-1 through 363-7 provided above, the analysis of potential direct and indirect impacts in the Draft EIR associated with historical resources was comprehensive and fully complies with CEQA requirements.

Comment Letter No. 364

Allyse McGrath
353 N. Sierra Bonita Ave., #6
Los Angeles, CA 90036-2456

Comment No. 364-1

I am writing today to express my deepest concerns about the proposed studio expansion project. My concerns specifically pertain to parking and traffic in the neighborhoods close to the project site.

Response to Comment No. 364-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 364-2 through 364-4.

Comment No. 364-2

First of all, an expanded Television City will mean more commuter traffic from workers and cast members headed to the campus. How many are expected on a daily basis? How many days of the week? When will those additional commuters begin working and visiting there? What does your analysis find will be the additional number of cars overall weekly and monthly? Will they be arriving at any time of day? For example, will the site be used 24 hours a day, seven days a week? Will the volume of expected incoming and outgoing traffic differ depending on the day?

Response to Comment No. 364-2

This comment is identical to Comment No. 253-3. Please refer to Response to Comment No. 253-3, above.

Comment No. 364-3

Secondly, the increase in traffic from cars and trucks passing through will mean more noise, more emissions, and more accidents. What does the noise study say will be the increase expected every day, over what it is now? What will the air quality impacts be? Won't this be affect our overall air quality indicators for our community? Please provide that evaluation. What is going to be the impacts on the number of car accidents, bicycle accidents, and pedestrian accidents in this area? The site is located at the intersection of two of the highest injury streets. Will the expected increase in accidents put Beverly and

Fairfax in an even higher ranking for high injury streets? What measures are going to be taken to ensure this does not happen and that there will be no increase at all in the number of car, bike and pedestrian accidents, deaths and injuries. Please think about the children and families who call this place their home.

Response to Comment No. 364-3

This comment is identical to Comment No. 253-4. Please refer to Response to Comment No. 253-4 above.

Comment No. 364-4

There has been little to no transparency or communication so far from the developer and their team. It is my sincerest hope that you will evaluate this project based on merit and impact for residents who live in the area, not just the people who commute to work at the studio.

Response to Comment No. 364-4

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment Letter No. 365

Megan McGregor
8125 1/2 Blackburn Ave.
Los Angeles, CA 90048-4423

Comment No. 365-1

I am writing about the Television City development being proposed, and I am opposed to the development because residents in the nearby neighborhoods, including me, know very little about it. And we are concerned this project is going to be approved with the community getting very little specific information.

Response to Comment No. 365-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 365-2.

Comment No. 365-2

My main concern is residents have no idea what is being built. What exactly is going to be built? The draft EIR talks about studios, stages, offices, production space, but what is the actual description of the project? What is a specific plan? And what does it mean that there will be flexibility in deciding what the spaces or new buildings are going to be used for?

When is more information going to be provided about what goes into the specific plan that will allow residents to make an informed decision? And that about the effects on residential neighborhoods once the specific plan is actually “specific”?

Does the Planning department have the specific plan that can be reviewed by the community? If not, why isn't it required that the Planning department know more specifics about the project so that it can be evaluated thoroughly and completely? It is not acceptable for the community to be told, we'll tell you more when we know more.

What if the developers of this project change their mind about the buildings, such as height, location and what they will be used for, after the project changes? Is that going to be allowed? How will the community be informed about any changes? And what happens if the impacts of the project the community is told about then change as a result of those

changes? What if the impacts are expected to be worse once more specific plans about the project are actually made—what happens then?

Response to Comment No. 365-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. As also discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

As further discussed in Topical Response No. 1 and Response to Comment No. 9-14, the Draft EIR's environmental analysis encompasses the proposed development program and all maximum scenarios under the proposed Land Use Exchange Program, and thereby accounts for the maximum potential environmental impacts associated with the buildout of the Project. Further, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 365-3

The idea that a developer could say one thing and then do another is not fair to the community. I strongly oppose this project until very specific details are made available, along with the impacts of what is being planned and what could be approved as part of the project. I urge all our city leaders to also do the same.

Response to Comment No. 365-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the

decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 365-2.

Comment Letter No. 366

Dayn McHugh
537 N. Orlando Ave., Apt. 2
Los Angeles, CA 90048-2530

Comment No. 366-1

I am struggling to get through the entirety of the draft EIR. This document is extremely long, and I don't know how people are expected to read through this entire document to fully understand the project. The EIR itself is 1,000 pages with an additional 5,000 pages of appendixes. Studies have shown that on average it takes people about five minutes to read a page of technical materials. So on average, that means that I can read about 12 pages per hour. Therefore, if I read 2 hours a day after work, it would take me 200 days to read the draft EIR. The comment period is only 30 days! It would be impossible for me to even read the entire draft report before the comment period closed. There is no way the average person in our community would be able to read this. Can you please explain how this meets the requirements of CEQA? How is this document supposed to be an informational document for the public to get an understand of the project at 6,000 pages of much technical information? Why hasn't the city held any public meetings to explain what is being proposed, how the community is going to be affected, and give us a chance to ask all the questions we need to? How is the average person supposed to be expected to spend 400 hours reading this? Have you polled the community to see how many residents have read this document, or even understand what is being proposed? If you haven't, do you plan to? Have you polled the community to see if residents actually want and need this project?

Response to Comment No. 366-1

Section I, Executive Summary, of the Draft EIR provides a brief summary of the Project and its environmental impacts in compliance with Section 15123 of the CEQA Guidelines. The Executive Summary is intended to provide readers with a comprehensive overview of the Project, and is shorter in length than the entirety of the Draft EIR. While the commenter correctly points out that the Draft EIR is of considerable length, community members are not required to read the entirety of the Draft EIR, but rather are welcomed to read sections that interest them or address their outstanding concerns regarding the Project's environmental impacts. Furthermore, the Draft EIR was written in accordance with Article 9, Contents of Environmental Impact Reports, of the CEQA Guidelines, and contains all components described therein. Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 366-2

Furthermore, it seems like the most important documents to understand the project are missing from the report! Why isn't the specific plan included? The conceptual plan is nothing but a concept and so the developer in theory could build whatever they want. They can build literally anything in the commercial zones. How does the EIR analyze the hundreds of possible variations of the project? Please explain how we can possibly understand the project if there is no specific plan?

Response to Comment No. 366-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, 9-14, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the limited Land Use Exchange Program, and how the Project Description discloses all of the elements of the Project required by CEQA. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan, which were disclosed and analyzed in the EIR. As further discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As also discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment Letter No. 367

Chris McKee
gawara@ragcha.com

Comment No. 367-1

I expect you're mostly hearing complaints about this project, because there's an organized resistance to development, period. NIMBYs have caused rampant homelessness here in California [missing text] every major industrialized city in the world.

I understand, of course, TV City is not meant to become housing at all. But I am writing to support its development with a few caveats, which may help assuage some of the complaints of the [missing text]

1. Require the project use only electric vehicles. Volvo and Tesla are accepting orders for electric semis now, which will start shipping to buyers next year. And Mack and Caterpillar are already [missing text] other construction equipment. This will mitigate much of the pollution.
2. Require the construction start by building a parking structure on Fairfax south of Olympic—perhaps where the 7-11 [sic] is—and then get rid of the curbside parking on that stretch to reduce traffic [missing text] keep the shops and cafes on that stretch alive, with parking for their customers.
3. Extend the no stopping/parking zone from 7am–7pm on 6th street between La Brea and Just West of Cochran, where the road widens, to reduce jams there. Look for similar stretches on Be [missing text] Fairfax.
4. Look into the dozens of abandoned and underdeveloped properties on Fairfax to determine why they have not been developed into 5-story apartment buildings. Also the delayed development [missing text] One of the complaints I'm hearing is that there aren't enough homes for all the people who will be working in the expanded site once it is completed. I contend there is plenty of space here [missing text] not been developed. I will include a photo of an entire blighted block, just one block from 3rd & Fairfax, which should be replaced with housing.

Thank you for your time and consideration. I hope these ideas help the stakeholders find an acceptable compromise.

Response to Comment No. 367-1

While electric truck use for Project operation will inevitably occur as a result of CARB's recent decision to phase out diesel trucks by 2036, electrification of the

construction truck fleet is not a feasible measure given the large fleet of trucks required, distance traveled, and weight of loads. However, Mitigation Measure AIR-MM-2 has been amended to require the use of model year 2014 or newer heavy-duty trucks meeting CARB's low NOx standard during construction to the extent commercially available. Refer to Response to Comment No. 164-3 for a discussion of trucking, haul routes, and health effects.

The construction of a public parking structure and redeveloping properties the Applicant does not own are beyond the scope of a project EIR. Nevertheless, the suggestions are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The idea of an extended no stopping zone is not required to mitigate any Project impact. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 368

Luke McKinley
538 N. Spaulding Ave.
Los Angeles, CA 90036-1857

Comment No. 368-1

Heavy traffic, congestion, road closures and air pollution are already elements of living in L.A. This project makes all of those elements worse—does the Air Quality analysis show that there could be 50, 100 or 200 production trucks spewing diesel particulates in the community for years to come?

Response to Comment No. 368-1

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

The commenter's assertion regarding the number of production trucks to be used by the Project is incorrect. Please refer to Response to Comment No. 87-1 regarding emissions related to production trucks and Response to Comment No. 26-E.1-16 regarding the number of Project-related operational trucks accessing the Project Site per day. As shown therein, the truck trips (approximately 31 total net new diesel trucks) would be substantially less than the 100 trucks criteria cited in the Draft EIR that would trigger the need for a mobile air toxics HRA (see page IV.A-72 of the Draft EIR). This information further supports the Draft EIR's conclusion that Project-related TAC emission impacts during operations would be less than significant and consequently not result in a potential health risk impact.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to SCAQMD comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. On May 5, 2023, SCAQMD concluded that the HRA protocol adequately addresses health risk impacts related to the Project. The HRA utilizes methods formulated to be protective of the health of the most sensitive individuals in the population, including children and seniors. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased truck trips associated with future operations, would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Comment No. 368-2

What about the greenhouse gas emissions from all these trucks?

Response to Comment No. 368-2

Please refer to Response to Comment No. 335-1 regarding GHG emissions from Project-related trucks.

Comment No. 368-3

Are the power generators used at the basecamps going to run on diesel fuel or 100% electric? If it's the former, what is the plan for dealing with the toxic emissions and noise from these generators? Where will these power generators be located and how much will they run?

Response to Comment No. 368-3

This comment is substantively similar to Comment Nos. 188-4. Refer to Response to Comment No. 188-4, above .

Comment No. 368-4

And if these environmental impacts are as grim as they seem to be, how could the City have approved this project?

Response to Comment No. 368-4

Pursuant to Section 15092(a) of the CEQA Guidelines, project approval occurs only after the Final EIR has been completed and the Lead Agency decides whether or how to approve or carry out the project. Therefore, approval of the Project would not occur until after review and consideration of the Final EIR.

Comment Letter No. 369

Tara McVictor
153 S. Laurel Ave.
Los Angeles, CA 90048-3513

Comment No. 369-1

The Beverly Fairfax area deserves to receive real information that addresses the CBS building expansion in full. From what has been shared on the internet, this seems like a giant endeavor that is going to be constructed over the next 15 years. I still have no idea what in the world this proposal is. Will there be any apartments? Or just a bunch of offices? Surely, they aren't using a substantial amount of space for office, right? People work from home, and we need housing. We need AFFORDABLE housing. Where is the specific plan for this?

Response to Comment No. 369-1

As discussed throughout the Draft EIR, the Project is a studio project, which would continue the existing studio use; accordingly, the Project does not include any housing. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan and Topical Response No. 3, Permitted On-Site Uses, and Response to Comment Nos. 5-6, 9-13, and 26-16 with regard to the land uses that would be permitted in the proposed Specific Plan and the mix of studio uses. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

Regarding the timing of the Project, refer to Response to Comment No. 9-24.

As discussed in Topical Response No. 1, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project. Neither CEQA nor City policy requires a draft Specific Plan to be included in the EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

The commenter's opinion regarding housing is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 369-2

As far as I can tell, this is going to be a 20-year build. Is it in phases? When will it start? How many trucks are coming in per day? What will be done about the damage to the roads? Will you use the grove entrance for this? The construction is destined to impact school traffic.

Response to Comment No. 369-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, with regard to the Project Description and proposed Specific Plan and Topical Response No. 14, Construction Vehicle Impacts, regarding construction haul routes, truck trips, and the proposed CTMP, which includes measures to reduce the effect of construction trips on the surrounding community, including schools.

Regarding the timing of the Project, refer to Response to Comment No. 9-24.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding traffic and safety.

With regard to roadway damage, in the unlikely event that roadway damage occurs during construction, repair would occur under the direction of the City.

Comment No. 369-3

Not only is this a traffic nightmare that the city is not prepared to handle, but it is going to destroy the climate. LA has the best weather in the world. We can't destroy what we have with all these additional cars on the road, in addition to all the trucks that will be needed for the project. With the increased traffic, all those cars and construction trucks will be idling in the gridlock. Has there been a climate study?

Response to Comment No. 369-3

Please refer to Response to Comment No. 335-1 regarding GHG emissions from Project-related vehicles and trucks.

The Draft EIR provides a thorough analysis of the Project's GHG impacts within Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. The analysis includes quantification of construction and operational GHG emissions (including Project-related construction and operational vehicular and truck trips), quantification of applicable reduction measures, and consistency with applicable local plans and policies. However, the threshold of significance adopted by the City for the CEQA GHG analysis is qualitative

and based on the Project's consistency with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Thus, although provided for informational purposes only, the quantitative data and analysis demonstrate with substantial evidence that the Project's consistency with applicable plans, policies, regulations, and requirements will in fact result in notable GHG emissions reductions.

The Draft EIR correctly concluded that the Project would result in less than significant GHG impacts.

Mobile source emissions were modeled using CalEEMod which is based on EMFAC and includes both idle and travel emissions. Mobile source (e.g., cars and trucks) GHG emissions are provided in Table IV.E-11 (Annual Project GHG Emissions Summary) on page IV.E-78 of the Draft EIR.

Pursuant to SB 743, congestion is not a CEQA impact. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 369-4

Has there been a health study that includes the additional gas and diesel emission from the additional car and truck traffic?

Response to Comment No. 369-4

Refer to Response to Comment No. 26-E.1-21 for a discussion of the Draft EIR's analysis of localized air quality impacts. Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to public comments on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the findings of the Draft EIR.

Comment No. 369-5

Also, we're in the middle of drought. What about the lack of water in this region? How much water will a project of this size require per day? Is this the best use of water?

Response to Comment No. 369-5

Refer to Response to Comment No. 16-66 with regard to the adequacy of water supply to serve the Project and the consideration of drought conditions. Refer to Response

to Comment No. 26-175 regarding the Project's water demand and impact analysis. As discussed therein, LADWP's analysis does not focus on "best use of water." Rather LADWP's analysis focuses on the water demand associated with the Project as well as conservation features to reduce water demand.

Comment No. 369-6

Please address these concerns. Our community deserves better.

Response to Comment No. 369-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 369-1 through 369-5.

Comment Letter No. 370

Peter Meadows
360 1/2 N. Gardner St.
Los Angeles, CA 90036-5723

Comment No. 370-1

EIR fails as an informational document for the public or the City. There are so many issues that are not addressed and the project is not even clearly defined.

Response to Comment No. 370-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. With respect to the claim that the EIR fails as an informational document, refer to Response to Comment Nos. 370-2 through 370-6, below, which support the adequacy of the Draft EIR. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 370-2

Will there be a specific description of what the project is and what will be built? When will it be released to the public? What is the specific plan and where is it?

Response to Comment No. 370-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project. Neither CEQA nor City policy requires a draft Specific Plan to be included in the EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Refer also to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan.

Comment No. 370-3

Where will the Television City employees be located? Where will they park? Where are they commuting from? I know this is an entertainment studio, but how much noise are we as residents to expect on a daily basis?

Response to Comment No. 370-3

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Section IV.I, Noise, of the Draft EIR addresses potential noise impacts associated with construction and operation of the proposed Project. Noise associated with studio-related production is discussed beginning on page IV.I-44 of the Draft EIR, which, as stated on page IV.I-45 of the Draft EIR, noise impacts associated with outdoor studio production activities would be less than significant. Details in support of the noise impacts analysis are provided in Appendix J of the Draft EIR. As discussed therein, operational noise impacts would be less than significant.

Comment No. 370-4

Mostly, I am concerned about parking and traffic. Where in the analysis does it address the hundreds if not thousands of people who may come to attend the audience shows at the property? Please explain how the parking will work for people who come to see shows during the day when the parking structures are full with the 8,000 employees. I read that the project could affect the farmers markets parking. What happens when this inconveniences the public enough to stop going and it gets shut down?

Response to Comment No. 370-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The

Project would not affect parking at The Original Farmers Market as described in Section C, Parking Spillover into Adjacent Neighborhoods and Properties, of the topical response.

Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, regarding the number of audience visitors and trips.

Comment No. 370-5

On top of that I understand that commercial loading zones are going to take over a number of metered parking spots. There is already a lack of parking in this area, what mitigation measures are going to be put in place for this?

Response to Comment No. 370-5

With respect to on-street metered parking, the Project does not propose to remove any such parking.

Comment No. 370-6

I read that streets, cross walks, sidewalks and bike lanes will be effected by the project. There is talk in the EIR of possibly improving some of these means, but no definite answer as to how. How are we supposed to believe that pedestrian safety is being prioritized when the project is taking them over? How will we be expected to travel anywhere at all considering traffic will be increased by 8,000+ people?

Response to Comment No. 370-6

There are no plans for any long-term sidewalk or bike lane closures as part of the construction process. There are some utility upgrades that would require new or revised connections between the Project Site and utilities that currently run under the streets. For these connections, sidewalks and bike lanes would have to be closed temporarily, but the CTMP prepared pursuant to Project Design Feature TR-PDF-1 would require that temporary sidewalks and bicycle rerouting be provided to maintain pedestrian access past the Project Site.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

With respect to congestion, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and

Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 370-7

There seems to be too many unanswered questions regarding this project and we as citizens deserve answers, detailed answers. There is little to no impact analysis and this terrifies me. I do not know what to expect living in this community anymore. Please provide us with a detailed EIR that will be circulated throughout the city. Everyone deserves a say in this matter and they deserve to know how they will be affected.

Response to Comment No. 370-7

Refer to Response to Comment Nos. 370-2 through 370-6. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 371

Zak Means
9217 Alcott St.
Los Angeles, CA 90035-3103

Comment No. 371-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 371-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 372

Faige Meller
336 N. Kilkea Dr.
Los Angeles, CA 90048-2227

Comment No. 372-1

Regarding the TVC 2050 expansion of the CBS studios, I would like you to address several concerns that I have.

Response to Comment No. 372-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 372-2 through 372-6.

Comment No. 372-2

Regarding traffic:

1. There will be a lot of car and truck traffic caused by this expansion. I think there needs to be turn lanes for traffic making right turns onto the project. Why aren't there going to be any dedicated turn lanes for trucks and cars? Were they considered? How is the problem of cars and trucks trying to make turns, darting across oncoming traffic going to be addressed?
2. Grove Drive is not a very large street. Why is the large parking garage going to be located on the Grove drive? Did you consider how many cars will have to drive on that street? Please explain the rationale for its use? Were alternative streets considered?
3. Grove Drive is also an access point for the Holocaust Museum with lots of school buses dropping kids off. How will the school buses be able to safely drop kids off with thousands of additional cars across the street? Will this be safe for school children? What measures are going to be taken so that safety remains a priority?

Response to Comment No. 372-2

This comment is identical to Comment No. 324-2. Please refer to Response to Comment No. 324-2, above.

Comment No. 372-3

Regarding zoning:

1. The DIER [sic] says that any use in the C2 zone will be allowed. What exactly is a C2 zone? From what I understand there are over 100 uses that could be allowed in the C2 zone. How will the community know what uses could be going to be proposed?

Response to Comment No. 372-3

This comment is identical to Comment No. 324-3. Refer to Response to Comment No. 324-3, above.

Comment No. 372-4

How will the community be informed about when and if that happens?

Response to Comment No. 372-4

This comment is identical to Comment No. 324-4. Refer to Response to Comment No. 324-4, above.

Comment No. 372-5

How are traffic impacts analyzed for the project for the variety of potential uses? Does that impacts analysis have to be done with potential uses are actual planned uses?

Response to Comment No. 372-5

This comment is identical to Comment No. 324-5. Refer to Response to Comment No. 324-5, above.

Comment No. 372-6

Regarding Vehicle Miles Traveled:

1. The analysis says the average travel distance is 3.5 miles. This does not make sense to me. Can you provide more details on how this number was reached and what it means?

Response to Comment No. 372-6

This comment is identical to Comment No. 324-6. Refer to Response to Comment No. 324-6, above.

Comment Letter No. 373

Harry Meller
6500 W. Fifth St.
Los Angeles, CA 90048-4712

Comment No. 373-1

I am a resident who is very concerned with the proposed Television City expansion project. We have not been made aware of just what this project will entail and what the details are, but my understanding is that it will be developed over 20 years, significantly enlarging the current footprint of Television City.

Response to Comment No. 373-1

This comment is nearly identical to Comment No. 256-1. Refer to Response to Comment No. 256-1, above.

Comment No. 373-2

I have several questions:

1. The neighborhood includes multiple schools and nursing facilities. Have these organizations and other types of businesses, not to mention residents, been notified of the increase in truck traffic and car traffic due to construction? What specific information have they been told about the impacts of those increases because someone told me the developer said there were no significant impacts, but there cannot be no impacts with a project like this? What impacts are considered by the city as not significant? Who determines what is significant or not for residents who are affected?

Response to Comment No. 373-2

This comment is identical to Comment No. 256-2. Please refer to Response to Comment No. 256-2, above.

Comment No. 373-3

2. On a related note, the developer would be keeping trucks in the community where Loyola High School and Kaiser Hospital are. The trucks would be an eyesore, polluting the air, backing up traffic, and potentially causing harm to the health of people who are already facing struggles. That area is a low-income area, so I would like to know how it was decided that trucks would be in this particular community. How that could be considered acceptable when there are

impacts to that low-income area? For what periods of time would those trucks be there? And would they be parked there, idling while waiting to drive somewhere else? Where exactly would they be parked?

Response to Comment No. 373-3

Refer to Response to Comment Nos. 178-3 and 183-1 regarding off-site staging. The Project has been modified to eliminate the off-site staging of haul trucks along streets serving the Project Site. There is no longer a plan to stage haul trucks near Kaiser Hospital or Loyola High School. All haul truck staging would be accommodated within the Project Site itself. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 373-4

3. The older buildings of Television City, from the 1960s and early 1970s, are not considered historic due to the definition of historical resource because that date is 1963. Please explain where that year of 1963 comes from in determining what part of the building is historic, and why the other buildings from Television City's past are not worthy of being preserved? Who or what policy sets that standard? What is involved in having the other older parts of Television City be preserved because there is a lot of history in those older buildings as well?

Response to Comment No. 373-4

Buildings and structures constructed after 1963 were not included in the HCM designation; these buildings were also analyzed as a part of the Draft EIR historical analysis and confirmed not to be historical resources. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 19-12 regarding the period of significance.

Comment No. 373-5

Thank you for your consideration.

Response to Comment No. 373-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 374

David Meltzer
heytmrw2@gmail.com

Comment No. 374-1

This is David Meltzer and I read people with an opinion on the CBS construction project should make their feelings known by Monday. OK—I oppose this project unless it can be shown those behind it live in the beverly grove [sic] area. SOOOOOOO easy to ask others to sacrifice when you are far away. I could go on and will if you and the councilman want me to do so. I am not afraid to express myself face to face or thru technology to the extent I understand the technology which is barely. Contact me if you wish Dylan. I am at your disposal as a retired 40 year federal employee who worked alongside federal administrative law judges and won awards for my performance.

Response to Comment No. 374-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 375

David Meltzer
heytmrw2@gmail.com

Comment No. 375-1

Hackman people want to talk to me. I imagine the person who will speak with me for them is adept at deflecting criticism and turning things to the bright side maybe all the benefits LA will secure down the line. I suppose self serving statements from the company that does these acquisitions for a living is to be expected but they will not deter me and my pursuit of the reality here which may mean no money for people who will NEVER EVER have enough.

Response to Comment No. 375-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 375-2

The congestion in an area already afflicted with that as the Grove, Farmers market already makes driving around there a cause for delays and now this and if what I've received in the mail is true city closures which ONLY could happen if the city was on board!!!!!!!

Response to Comment No. 375-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 375-3

I don't think the company can just hire guys to stand there with flags stopping traffic allowing that parade of trucks access if frankly CITY PLANNING was not in agreement.

Response to Comment No. 375-3

Pursuant to Section 15092(a) of the CEQA Guidelines, project approval occurs only after the Final EIR has been completed and the Lead Agency decides whether or how to approve or carry out the project. Therefore, approval of the Project would not occur until after review and consideration of the Final EIR.

Comment No. 375-4

But most of all it is this dispersal of NO_x that should trouble anyone living around CBS.

Response to Comment No. 375-4

Refer to Response to Comment No. 16-12 for a discussion of Project localized air quality impacts, including localized impacts related to NO_x. As discussed therein, Project construction and operational emissions would not exceed SCAQMD's localized significance thresholds with incorporation of mitigation measures. SCAQMD's localized significance thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.

Comment No. 375-5

And I doubt if any Hackman people do!!!!!!!!!!!!!!

Response to Comment No. 375-5

The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 376

Hannah Menkin
424 N. Alta Vista Blvd.
Los Angeles, CA 90036-2541

Comment No. 376-1

I am writing to express my concern and opposition toward the TVC 2050 project and its impacts on the community.

Response to Comment No. 376-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 376-2 and 376-3.

Comment No. 376-2

How can the public understand and weigh in when it hasn't been made clear what the actual planned uses are? When will a definitive plan be made available? How can the City approve a project that is more in concept than in specifics? If that is even possible, what do you then tell community members about how the project is going to actually affect their daily and long-term lives?

Response to Comment No. 376-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, 9-14, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the limited Land Use Exchange Program, and how the Project Description discloses all of the elements of the Project required by CEQA. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan, which were disclosed and analyzed in the EIR. As further discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 376-3

Will the city have any power to impose restrictions on how they use this property in a way that is more restrictive than the C2 zoning? What powers do they have and what will the enforcement method be? What penalties can be imposed on the developer if they violate those restrictions?

Response to Comment No. 376-3

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan, which were disclosed and analyzed in the EIR. As discussed therein, based on input received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project and specifically removes the reference to all C2 uses (even though these uses are currently permitted); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses—sound stages, production support, production office, general office, and retail—as well as related ancillary and supportive uses. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan.

Comment No. 376-4

The developer should be required to add more clarity to the draft EIR about the intended uses on their property. Neighbors deserve to know what will actually happen on the property.

Response to Comment No. 376-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 376-2 and 376-3.

Comment Letter No. 377

Alex Messana
481 S. Roxbury Dr.
Beverly Hills, CA 90212-4165

Comment No. 377-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 377-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 378

Ida Messinger
448 N. Edinburgh Ave.
Los Angeles, CA 90048-2308

Comment No. 378-1

The applicant likes to talk about the studio uses on this site, but the Draft EIR lists a bunch of other stuff that they can do on the site with no analysis or explanation—including all uses in the C2 zone! The Draft EIR doesn't tell you, but I looked at Planning's "Lists of Uses Permitted in Various Zones" and it could be HUNDREDS of uses, including carnivals, hospitals, massage parlors, medical offices, and sports arenas. What's really going on here? The Draft EIR needs to explain which and how much of all of the proposed uses will be allowed and how they will be regulated. The impacts of the uses could be dramatically different than what is described. And what exactly is production support and production office? There's no explanation in the Draft EIR. And is there any restriction on what can occur in basecamps? How are we supposed to understand what the impacts will be and if they have been properly assessed if there's no explanation? The Draft EIR is useless. Where are the uses and activities described? Where are the impacts disclosed? If not disclosed then they shouldn't be permitted.

Look forward to your response.

Response to Comment No. 378-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan; Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment No. 5-7 with regard to the definition of floor area under the proposed Specific Plan; and Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan. As discussed in Topical Response No. 3, based on input received in response to the Draft EIR, the permitted uses were clarified to reflect the studio-related objective of the Project and specifically removes the reference to all C2 uses (even though these uses are currently permitted); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan only permits five land uses—sound stages, production support, production office, general office, and retail—as well as related ancillary and supportive uses. The EIR comprehensively analyzed all proposed uses, areas and activities.

The Project does not include carnivals, hospitals, massage parlors, medical offices, and sports arenas, and such uses would not be permitted under the proposed Specific Plan. Refer to Response to Comment Nos. 5-6, 28-6, and 224-1 regarding the specific uses discussed in this comment.

Refer to Response to Comment No. 26-122 regarding the definitions of production support and production office. Refer to Response to Comment No. 26-121 regarding the basecamp use.

Comment Letter No. 379

J. Brandon Meyer
535 N. Spaulding Ave.
Los Angeles, CA 90036-1855

Comment No. 379-1

I am a 26 year resident of the Beverly Fairfax community. I am writing to you today in response to the Draft Environmental Impact Report. After reading through it, I am left with many questions and even more concerns.

Response to Comment No. 379-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 379-2 through 379-7.

Comment No. 379-2

As someone who commutes to and from work by car, I am primarily concerned with the impact the Television City project would have on traffic in my neighborhood. Have you analyzed the impacts to those of us who drive in and out of the neighborhood for work, not just those you expect to drive here for work at the new site?

The plan drawings show several semi-trucks onsite. These trucks will consistently have to make left turns into oncoming traffic. Have studies been conducted to analyze how much extra traffic this would create? If so, can that please be outlined to me in a response to my letter? How will some of those trucks access the site, from other points as well? Furthermore, the plan fails to specify *how many* trucks would be on-site and when. Can you please specify? There's a big difference in the amount of traffic created by 50, 100,200, [sic] and so on trucks.

Response to Comment No. 379-2

This comment is identical to Comment No. 231-2. Please refer to Response to Comment No. 231-2,above.

Comment No. 379-3

Additionally, I am extremely concerned about the negative health impacts this project could have. Since you are putting a truck road and studio building next to apartments, negative

health impacts will undoubtedly occur. What kind of health studies have been conducted to evaluate the impact of noise and fumes on the residents? Did your health analysis, if one was conducted, include the impacts of students at the nearby schools? Which schools were shown to be most affected? What kind of health effects should I be worried about as a resident of Beverly Fairfax?

I understand that there will also be a large parking structure located on Grove Drive. The concerns I have above apply to this parking structure as well. Can you please draft an alternative in which parking is put somewhere else besides Grove Drive? And can you please avoid residential areas for such parking structures? Additionally, I am concerned about the children and seniors that use Grove Drive. Has a health impact analysis been conducted for these two groups as well? How will the exhaust emitted from the vehicles using the parking structure impact these groups?

Response to Comment No. 379-3

This comment is identical to Comment No. 231-3. Refer to Response to Comment No. 231-3, above.

Comment No. 379-4

Furthermore, this project proposes to stage thousands of trucks next to a hospital. What measures has the city taken to inform nearby residents and hospital employees that 60,000 trucks will be creating traffic nearby? What happens when the trucks are creating traffic and an ambulance needs to get to the emergency room? Can the public please see your plans for this?

Response to Comment No. 379-4

This comment is identical to Comment No. 231-4. Refer to Response to Comment No. 231-4, above.

Comment No. 379-5

Until we receive real information about the extra traffic created by this project and the real impacts expected, I cannot support this. Please respond to my letter with thorough responses to each of my questions. With more information, I can better form my opinion.

Response to Comment No. 379-5

This comment is identical to Comment No. 231-5. Refer to Response to Comment No. 231-5, above.

Comment Letter No. 380

Stephen Meyerson
2503 Spreckels Ln.
Redondo Beach, CA 90278-5336

Comment No. 380-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 380-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 381

Lisa Miller
527 N. Orlando Ave., Apt. 5
West Hollywood, CA 90048-2576

Comment No. 381-1

I hope you will seriously reconsider the proposed Television City expansion project. The EIR is confusing and incomplete. There are so many concerns with this proposed huge facility for a neighborhood that is historic. Please address these issues not explained in the EIR.

Response to Comment No. 381-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 381-2 through 381-9.

Comment No. 381-2

The Television City proposes improvements that will increase the height of some buildings by many stories. How will 20-story buildings appear behind our Farmer's Market and the Avila Adobe? The adobe has historical significance and has been around since 1818. How will the developer protect it from damage during all the construction? How close will the construction be to the edges of the adobe and market property? How will the increased traffic impact business at the Farmer's Market?

Response to Comment No. 381-2

This comment is identical to Comment No. 209-2. Refer to Response to Comment No. 209-2, above.

Comment No. 381-3

Also, it seems those tall buildings even fit into the neighborhood, was this even considered? The drawings show a mammoth sized complex. How could that kind of development fit into our community? What will happen to any views that residents in apartments have now?

Response to Comment No. 381-3

This comment is identical to Comment No. 209-3. Refer to Response to Comment No. 209-3, above.

Comment No. 381-4

With construction, residents need to know the schedule. How is the project construction going to be mapped out? Neighbors need to know the phases of the project, so please provide a plan. During construction there will be so many trucks, coming and going. Why is the route for this traffic pattern not confirmed already?

Response to Comment No. 381-4

This comment is identical to Comment No. 209-4. Refer to Response to Comment No. 209-4, above.

Comment No. 381-5

The digging required for this project will impact the groundwater. How will the nearby homes and businesses be affected by this change in the ground? Will foundations be shifted due to subsidence? Have the potentially affected owners of property been notified of these groundwater issues?

Response to Comment No. 381-5

This comment is identical to Comment No. 209-5. Refer to Response to Comment No. 209-5, above.

Comment No. 381-6

Has the developer partnered with the LA Conservancy in this development? It seems there has been a settlement of some kind. What is this settlement, and is it included in the EIR? Why does the LA Conservancy speak for our community? How does the settlement agreement affect the goals of the expansion project? How can the community know the limitations agreed to if it is not available to the public?

Response to Comment No. 381-6

This comment is identical to Comment No. 209-6. Refer to Response to Comment No. 209-6, above.

Comment No. 381-7

In the EIR, the Vehicle Miles Travelled analysis is difficult to understand. Please explain what vehicle miles travelled is and why is that used rather than number of cars and number of trips. The distance people drive in LA is greater than the averages you used; when are you going to correct those mileage numbers? The information does not seem to align with what are the typical transportation modes of Angelenos. For example, the VMT analysis makes assumptions about people traveling via public transportation, but most people's experience says otherwise. What data was used to create the analysis? If it showed a high percentage of people travelling via bus and metro, etc., then please provide that data.

Response to Comment No. 381-7

This comment is identical to Comment No. 209-7. Please refer to Response to Comment No. 209-7, above.

Comment No. 381-8

Thank you for your time.

Response to Comment No. 381-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 382

Lori Miller
527 N. Orlando Ave., Apt. 5
West Hollywood, CA 90048-2576

Comment No. 382-1

As a member of the Fairfax community, I feel threatened by the proposed project. How could such an egregious plan be put forward? There are many concerning aspects, and I will highlight a few of my main concerns below.

Response to Comment No. 382-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 382-2 through 382-4.

Comment No. 382-2

As it stands, there is a large parking structure being placed on Grove Drive. Grove Drive is right across from Pan Pacific Park. Children, senior citizens, and everyone in between frequent this park. With this new parking structure, there are going to be many more trucks entering Grove Drive and emitting fumes and exhaust next to the park. How many trucks are expected to be in this parking structure? How much diesel exhaust is going to be emitted? What are the health risks to people? Are the health risks different for younger children than for senior citizens? Please provide a proper analysis on the health risks associated with all of this exhaust.

Response to Comment No. 382-2

This comment is substantively similar to Comment Nos. 231-3 and 300-4. Refer to Response to Comment Nos. 231-3 and 300-4, above.

Comment No. 382-3

Staying on the theme of Grove Drive, essentially all of the parking is located on the road. This means that all the people trying to get to the project site will use Grove Drive. This seems impossible and is bound to be chaotic. How is the Grove gate going to handle this congestion? What will happen if 25% of traffic uses the Grove gate? What about 50%? 75%? And on the most extreme end, what would happen if 100% of the traffic tries to use the Grove gate?

Response to Comment No. 382-3

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access and use of The Grove Drive.

Based on the Conceptual Plan, almost 40 percent of the parking supply would be served directly from Fairfax Avenue and the remaining 60 percent would be equally served by the Beverly Boulevard and The Grove Drive signalized driveways. The parking supply on the Project Site is primarily served by the three signalized driveways and can be accessed from each of these driveways. Figure 22 on page 80 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that during the morning peak hour, approximately 32 percent of the inbound Project trips would use The Grove Drive entry, approximately 32 percent would use the Beverly Boulevard/Genesee Avenue driveway, and approximately 23 percent would enter the Project Site via one of the driveways on Fairfax Avenue. The remaining approximately 14 percent of entering vehicles would use the unsignalized driveways along Beverly Boulevard or along the Southern Shared Access Drive.

Comment No. 382-4

Another thing that concerns me is parking plan. In its current state, it makes no sense. The Draft EIR outlines that there will be roughly 8,000 people employees on site. Additionally, the large audience stages could bring in 3,000 to 5,000 people a day to the site. However, the project is allotting 5,300 parking spaces. What is the plan for employee parking? How are parking permits going to be distributed? How are they going to be monitored and enforced? With these numbers, there are not enough spaces. Where is the overflow going to park? Are you going to have designated spaces for them nearby or are they expected to park all around our community?

Response to Comment No. 382-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 382-5

All of the points above need to be addressed. They all directly impact the health and lifestyle of residents like me, and it is important for these questions to be answered and changes to be made. The plan it stands is unacceptable and needs to be heavily reconsidered.

Response to Comment No. 382-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 382-2 through 382-4.

Comment Letter No. 383

Ronda Minks
514 N. Hayworth Ave., Apt. 204
Los Angeles, CA 90048-2787

Comment No. 383-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 383-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 384

Kristin Mirek
525 N. Curson Ave.
Los Angeles, CA 90036-1813

Comment No. 384-1

The “Television City Project,” will be a major, extremely disruptive construction project that could last up to twenty years. The community knows very little about this project, in a lot of ways it is because of the EIR saying the developer “may” do this or that.

Response to Comment No. 384-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 384-2 through 384-6.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 384-2

For example, the developer “may” include pedestrian improvements in the plan. What improvements? When will they be made? Why won’t the developer commit to improvements? Why aren’t the improvements made on the front end of construction to make everything more convenient for the community? What will determine if the developer does or doesn’t make the improvements? When will the community be informed with the specifics? I expect real answers if the developer wants to build a 1.8 million square feet expansion in our community. There really isn’t even any certainty on the layout of this development.

Response to Comment No. 384-2

Refer to Response to Comment Nos. 16-72, 16-76, 28-18, 35-101, 172-3, and 313-2 regarding the Project’s pedestrian-oriented design and public realm improvements.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the

Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan.

Comment No. 384-3

The developer also includes mention of potential “project alternatives,” but can you explain what those alternatives are? Why are alternatives considered at all? And why and how are any alternatives disregarded outside of a public process? Just another non-answer on what this project even is.

Response to Comment No. 384-3

Refer to pages V-1 and V-2 of Section V, Alternatives, of the Draft EIR for an introduction to CEQA’s requirements regarding analysis of alternative project scenarios. PRC Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. CEQA Guidelines Section 15126.6(b) states that the discussion of project alternatives must focus on those alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Each alternative is explained in detail in Section V, Alternatives, of the Draft EIR, which is a public document that was published and circulated in accordance with CEQA. Refer also to Topical Response No. 16, Project Alternatives Analysis.

Refer to Response to Comment No. 32-3 regarding the noticing of the Project in compliance with CEQA.

Comment No. 384-4

They also have no idea what construction looks like for the development. The report evaluates based on a 32-month construction time period, but then it could actually be spread out over twenty years? How is that possible? Can you explain to me why a more consistent and predictable timeline is not required? Not preferred? What will be constructed first? I can’t imagine having to deal with construction for twenty years.

Response to Comment No. 384-4

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 384-5

What will be done about parking and managing the employees and construction workers that are going to invade our community and neighborhoods? What sort of enforcement is in place to make sure workers aren't parking in bike lanes or in neighborhoods? This could be a serious safety risk. Has this been considered? Where?

Response to Comment No. 384-5

The Project Site is large enough that all construction workers would be able to park on the Project Site itself. No off-site parking is needed to accommodate the parking demands of the construction workers and vehicles. Construction workers would be prohibited from parking off-site as part of the required CTMP prepared pursuant to Project Design Feature TR-PDF-1.

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 384-6

What about signage? Will there be signage for safety during construction? I believe there will be billboards surrounding the project site, but what about adequate signage for safety? Sometimes cones are used when a lane is about to gradually end; is that kind of driver notice going to be used, because the crews never plan well for it? Will there be billboards lit up at night? Has there been a study on the impact of these lights going into people's homes?

Response to Comment No. 384-6

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR. Also refer to Response to Comment Nos. 26-129 and 213-2 regarding off-site signs and billboards, which would not be permitted under the proposed Sign District. Note that pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts (including impacts with respect to lighting) shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only. Refer to pages 38 through 40 of the Initial Study for a discussion of lighting.

Refer to Response to Comment No. 73-2 regarding the proposed CTMP. As discussed therein, the CTMP, which will be prepared and submitted to the City for review and approval prior to commencing construction, will identify specific actions during construction, including appropriate signage, that will reduce effects on the surrounding community.

Comment No. 384-7

There just isn't any obvious way the developer is going to handle working with the community. There has already been so little information shared, and I don't see things getting better. Enough is enough.

Response to Comment No. 384-7

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 384-2 through 384-6.

Comment Letter No. 385

L. Mita
8701 Delgany Ave., Unit 103
Playa del Rey, CA 90293-8151

Comment No. 385-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 385-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 386

Nicole Mitchell
367 N. Stanley Ave.
Los Angeles, CA 90036-2338

Comment No. 386-1

I genuinely am concerned about the outlook of this proposed studio expansion construction project in the Beverly Fairfax neighborhood. I am familiar with some of the numbers that are being put before the public as far as the increase in Metropolitan transit ridership that will result from this new development.

Response to Comment No. 386-1

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 386-2

The proposal, as I understand it, outlines relatively specific increases in ridership that will supposedly result directly from the studio site. The purpose of this study, I am guessing, is to reassure the public that most of the increased traffic that would otherwise find itself on roadways will be rerouted on to rapid transit. The problem with this proposal is that most of this transit is almost a mile or more from the site. On what basis are you projecting the numbers of people coming to the site will take the metro and then walk the rest of the way? What actual use of transit is that based on? I doubt most commuters will walk that far. Furthermore, the Wilshire/Fairfax station which appears to be the nearest stop to the studio area isn't even expected to be ready for use for at least a couple more years. What is the plan for the meantime? Doesn't the fact that the stop is not operating yet change the analysis and findings?

Response to Comment No. 386-2

Tables 4A and 4B on pages 58 and 59 of the Transportation Assessment (Appendix M.1 of the Draft EIR) show the number of bus routes and stops near the Project Site. They also show that the current bus service has sufficient capacity available to accommodate the entire transit demand to be generated by the Project, even before the Metro D (Purple) Line Wilshire/Fairfax Station opens.

The trip estimates in the analysis show that up to 15 percent of the trips associated with the Project would take transit or bike or walk to the Project. Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

The transit connection to the Wilshire/Fairfax Station is not expected to be made on foot as suggested in the comment. The Project's TDM Program would require an extensive system of shuttle buses to carry Project employees and visitors between the Wilshire/Fairfax Station and the Mobility Hub on the Project Site.

The comment is correct that the opening of the Wilshire/Fairfax Station is probably still two years away. However, the Project is currently in the entitlement process and, once approved, would include approximately 32 months of construction. The Wilshire/Fairfax Station would likely be open prior to the completion of the Project.

Comment No. 386-3

It does not seem realistic to rely on public transit as a way of alleviating the otherwise seemingly inevitable traffic patterns that would arise from this expansion project. I am concerned that if we take these numbers as is, we will wake up a year or two from now regretting that we believed them. Why is the developer trying to say that all of the increase traffic is just not going to be a problem? For someone like me, many of the details of this proposal seem rather misleading.

Response to Comment No. 386-3

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM. Please note that the CEQA transportation analysis in Section IV.K, Transportation, of the Draft EIR conservatively did not account for the Project's full TDM Program. Nevertheless, the Draft EIR concluded that potential transportation impacts would be less than significant.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment. The Transportation Assessment (Appendix M.1 of the Draft EIR) identifies the key intersections in the Study Area where the Project trips would add delay to the future operations (Table 18 on page 162) and identifies both safety and operational improvements to reduce these delays and improve traffic safety.

Comment No. 386-4

Can you please explain to the concerned members of the public how we are supposed to adapt if the transit numbers are off and traffic spikes around our neighborhoods? What else am I missing here in this proposal? What other details are residents and commuters not being told?

Response to Comment No. 386-4

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

The transit assumptions are very conservative (i.e., low) in that they can be achieved even without the extensive shuttle bus system that is being provided to move Project employees and visitors between the Project Site and the Metro D (Purple) Line Wilshire/Fairfax Station.

Please note that the CEQA transportation analysis in Section IV.K, Transportation, of the Draft EIR conservatively did not account for the Project's full TDM Program. Nevertheless, the Draft EIR concluded that potential transportation impacts would be less than significant.

Comment No. 386-5

Please let me know of any information pertaining to these questions. I appreciate your time.

Response to Comment No. 386-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 386-1 through 386-4.

Comment Letter No. 387

Maliha Moloo
8125 Blackburn Ave.
Los Angeles CA 90048-4423

Comment No. 387-1

I ask that you take a closer look at the impact on air quality that the new studio at Television City would create if constructed. The air with breath [sic] around Los Angeles is already intoxicating and if there is a significant increase in carbon and pollutants from the traffic and construction of the project, we could be in for even more hazardous air.

Does the air quality analysis show that there could be 50, 100 or 200 production trucks spewing diesel particulates in the community for years to come? What exactly will be emitted? During what hours and over how many days? What about the greenhouse gas emissions from all these trucks? What are the specific effects expected from each of the types of particulate matter?

Response to Comment No. 387-1

This comment is identical to Comment No. 335-1. Refer to Response to Comment No. 335-1, above.

Comment No. 387-2

What can the developer possibly do to mitigate the health impacts of the worsening air quality due to this project? Other than not allowing the size, the amount of expected people, the volume of cars and trucks? Will the developer reduce the scale and density of what is being planned given the already poor air quality in Los Angeles?

Response to Comment No. 387-2

This comment is identical to Comment No. 335-2. Please refer to Response to Comment No. 335-2, above.

Comment No. 387-3

Also, I ask you consider the health risks to children and senior [sic] from all the trucks that will be entering Grove Dr and emitting diesel exhaust next to a park—where is the breakdown of the emissions just due to those trips in that location? Why is the large parking structure being placed on Grove Drive, which is a small street, and right across

from Pan Pacific Park? Think of the children that will have to breath [sic] dirty air from the pollution from all these trucks.

Response to Comment No. 387-3

This comment is identical to Comment No. 335-3. Please refer to Response to Comment No. 335-3, above.

Comment No. 387-4

As both a resident and concerned citizen, I humbly ask for you to consider these risks and pass these questions to the developer.

Response to Comment No. 387-4

This comment is identical to Comment No. 335-4. Refer to Response to Comment No. 335-4, above.

Comment Letter No. 388

Richard Moon
richard@wom3pl.com

Comment No. 388-1

Hi, please do not approve this “REOGIONAL [sic] CENTER” project.

The designation is inappropriate, and you need to take more time to review because our community needs more time to understand the massive negative impact this project will have.

Thank you for your time and consideration.

Response to Comment No. 388-1

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 389

Lynn Mooney
150 S. Detroit St.
Los Angeles, CA 90036-2914

Comment No. 389-1

There are some things that are not made clear in the draft EIR for the TVC 2050 project, and I want a better understanding.

Most of us in the community know the importance of the historic and iconic landmark of the CBS Television City studios. But what we don't know is how the developer is able to build such an enormous and modern project when the entire property has a long and important history.

Please explain how only one small part of the site is being preserved? What is it I read about a settlement agreement between the LA Conservancy and the project's developer? How was the conservancy able to make an agreement that affects residents without our even knowing about it? Are the terms in the settlement agreement considered in the EIR? Doesn't this affect the historic designation the property got a few years ago? Does the agreement have specific constraints?

Another question I have is quite simply—what is the agreement? Is the project's developer paying the Conservancy? How much? Please provide more detail on what the agreement is at its core. Do the settlement agreement's limitations impact the project objectives? How so? In what capacity? Which specific objectives?

Another question I have is how will development be clustered in the center of the project site if the LA Conservancy settlement agreement requires setting back from the already existing buildings? This makes no sense to me. Please provide a detailed plan on how the development will be clustered in the middle given the agreement.

And lastly, and perhaps most importantly, how can the city of LA and community at large even understand what these issues are? The reason I ask that is because no one has had access to the Settlement Agreement. This issue seems large and impactful enough for the residents of the affected community to be kept in the loop.

I think it is fair for residents to be provided with the agreement. If you will not do so, please give us enough detail so that we understand what the agreement is. What are most significant aspects of the agreement? Who benefits the most from the agreement and in

what capacity? Who “loses” the most from the agreement? In one sentence, what is the agreement? If the developer is paying the conservancy, we would like to know how much.

Response to Comment No. 389-1

Refer to Sections B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, as well as Response to Comment Nos. 26-46 and 186-1 regarding the rehabilitation and preservation of the integrity of the Primary Studio Complex.

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

Comment No. 389-2

To be kept in the dark here is wrong and offensive, and I want a detailed response to all of the points made above.

Response to Comment No. 389-2

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 389-1.

Comment Letter No. 390

Robert Moran
120 N. Fuller Ave.
Los Angeles, CA 90036-2812

Comment No. 390-1

I'm writing today as a concerned citizen with many concerns and questions I'd like to share. I have read over the Television City EIR and here are the questions I would like addressed by the applicant.

Response to Comment No. 390-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 390-2 through 390-4.

Comment No. 390-2

As a resident that lives within 5 miles of the project site, my biggest concern is the traffic and the parking. According to the EIR, the average commute for visitors and employees will drive about 3 miles each way to the new studio. How could this possibly be true? As a resident of this area, I can assure you that thousands of these employees do not live in this area.

1. What model and analysis did you use to come up with the 3-mile commute figure?
2. How did the applicant take into consideration public transportation and the unknowns that arise with ride share.
3. How would the applicant accommodate parking if the site were to ever expand in the future?

Where is the data on how the applicant came up with these figures and please explain the data in a way residents can understand? We are scratching our heads wondering how they projected a 3-mile commute for employees. The home prices within a 3-mile radius of the proposed site would be out of the price range for mid level employees that would be working at the studio.

4. What economic factors did you take into consideration when commissioning the traffic study? As the cost-of-living increases, the number of employees who will move out of the city center and move further out. This will mean that most of the employees will be driving into work each day.

Response to Comment No. 390-2

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

The VMT Calculator is based on the citywide LADOT travel demand forecast model that projects land use and transportation choices out 20 years into the future. It tracks home-to-work trips through the entire Southern California region and looks at the likely distribution of trips that would be attracted to jobs at the Project Site. Transit choices, traffic congestion, residential and job density, housing prices, and a whole host of other factors go into the projection of future travel patterns in the region.

Refer to Topical Response No. 11, Transportation Demand Management, regarding the trip adjustment assumptions.

Refer to Topical Response No. 13, Parking, for a discussion of the Project's on-site parking supply and demand.

Comment No. 390-3

I am imagining that your under-estimation of commuters will have also skewed your air quality data. The air quality will definitely be worse with the presence of so many additional cars and trucks to the area.

5. Explain how you conducted the air quality test and what numbers you used in that test.
6. When commissioning the air quality test, did you take into consideration the increasingly hot summers and how that will continue to impact the air quality around the site?

Response to Comment No. 390-3

Please refer to Response to Comment No. 26-E.1-23 for a detailed discussion regarding transportation trip generation. The count of VMT identified in the User Defined Commercial line item on pdf page 102 of Appendix B of the Draft EIR are representative of

VMT estimated for all operations. Detailed estimation methodologies are presented in Appendix B-1, Air Quality and Greenhouse Gas Emissions Methodology, of the Draft EIR.

See Response to Comment No. 26-E.1-25 for a discussion of summer versus winter emission factors used for Project vehicle emission estimates.

Comment No. 390-4

I am just a concerned resident that would like answers. I would like to understand how the applicant came up with some of the data and findings, especially how the applicant states there are no significant impacts. Please explain?

Response to Comment No. 390-4

The Transportation Assessment included as Appendix M.1 of the Draft EIR includes a discussion of the methodology used in the analysis. Refer to pages 83–84 of the Transportation Assessment. Refer also to Topical Response No. 8, Vehicle Miles Traveled, for a discussion of the VMT analysis.

Comment Letter No. 391

Rick Morgan
424 N. Ogden Dr., Apt. 2
Los Angeles, CA 90036-1725

Comment No. 391-1

I live nearby to Television City and the proposed Television City 2050 project.

Response to Comment No. 391-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 391-2

I would like to know what it is going to do to the area I live in. Specifically, how is it going to affect traffic. Also, how will it affect the Metro? Is this really going to take 20 years?

Response to Comment No. 391-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The Project would support Metro through a privately funded shuttle bus system that will transport Project employees and visitors between the Wilshire/Fairfax Station and the Mobility Hub on the Project Site. The Project would not affect existing Metro services.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 391-3

The construction for this project is going to bring so many trucks to the area and then once it is completed there will be many more people and cars than the area is used to. How many cars and trucks did your studies find will be coming to the area during each of the years of construction? And when is the community going to know if construction will be 3 years or up to the 20 years? We should know that before the project gets approved,

because otherwise are you going to tell the community “we’ll let you know down the road at some point?” What about all the additional cars during all the years when construction is done and the new development starts being used, how many then?

Response to Comment No. 391-3

This comment is identical to Comment No. 135-2. Please refer to Response to Comment No. 135-2, above.

Comment No. 391-4

Most of us in the neighborhood have no idea what a Regional Center is, so please explain what that is, why it’s being considered to be put here, and what that will mean for our community? What if we don’t want a Regional Center here? Don’t the residents and businesses here have a say in that? Does it mean the property will always be a Regional Center? Is that something that goes into the city general plan? If so, can it be taken out of the general plan?

Response to Comment No. 391-4

This comment is identical to Comment No. 135-3. Refer to Response to Comment No. 135-3, above.

Comment No. 391-5

I am wondering what is going to happen with all of the trucks that will be hauling away debris and waste from the construction site? How often will they be leaving the site to haul loads? What times of day and which days? What routes will these trucks be taking? Traffic gets backed up badly now on Fairfax, on Beverly and on West 3rd, so why do you expect all those trucks won’t make the situation even worse? How do we know they will they be kept out of our neighborhoods? What enforcement will be done to make sure that trucks are not idling in the area damaging the already bad air quality?

Response to Comment No. 391-5

This comment is identical to Comment No. 135-5. Please refer to Response to Comment No. 135-5, above.

Comment No. 391-6

I hope that there are good answers to all these questions.

Thank you for your time.

Response to Comment No. 391-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 391-2 through 391-5.

Comment Letter No. 392

Alyssa Morris
458 1/2 N. Spaulding Ave.
Los Angeles, CA 90036-6305

Comment No. 392-1

I was totally shocked to see that the proposed construction will take 20 years.

Response to Comment No. 392-1

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Comment No. 392-2

Will we have to endure consistent, loud construction noise and haul trucks for the entire duration? Where will these trucks be allowed to idle? What about the buses and shuttles that brings people in and out of the site—where will they be allowed to idle?

Response to Comment No. 392-2

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise. Additionally, construction activity, including truck trips, would vary by construction phase. Refer to the construction noise analysis included in Section IV.I, Noise, of the Draft EIR. All haul truck staging locations will be provided on-site, so no haul trucks will be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Bus and shuttle idling would also occur within the Project Site. Idling during construction and operation would be restricted to no more than 5 minutes at any given time consistent with CARB airborne toxic control measure (ATCM) requirements.

Comment No. 392-3

Will they refuel on site? If so, does that mean that there will be a full-on gas station?

Response to Comment No. 392-3

The Project would not include fueling stations. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 392-4

What if the trucks and big buses break down? There will be instant traffic gridlock.

Response to Comment No. 392-4

This comment provides a general statement on the possibility that construction vehicles and buses may break down and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 392-5

There are just too many unknowns about this project for us to support. I think the Draft EIR should be reconsidered from the beginning and then recirculated to the public.

Response to Comment No. 392-5

Refer to Response to Comment Nos. 392-1 through 392-4. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 393

Adam Moysey
130 N. Gardner St.
Los Angeles, CA 90036-2720

Comment No. 393-1

As an 11 year resident, my husband Andy and I, would like to share our concerns about the EIR and its relation to the Television Studio Project.

Response to Comment No. 393-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 393-2 through 393-5.

Comment No. 393-2

1. The Draft EI [sic] has stated that the developer's return on investment is a project objective. The financial data behind this claim has not been supported. Please provide and circulate to the public the developer's proforma. Since the Developer has included as an objective, the financial information must be made available.

Response to Comment No. 393-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 393-3

2. The Draft EIR says any use in the C2 zones will be permitted. There are over 100 uses permitted in the C2 zone, including department stores, auditoriums up to 3,000 people, museums, hotels, car washes, schools, circus, auto repair facilities, building material stores, hospitals, nursing facilities, medical laboratories, and dozens of different kinds of retail stores and other establishments. Many of these uses and their related impacts have not been analyzed. Can you please provide an analysis of the potential impacts associated with this range of uses? For example, what would the traffic impacts

be if the project included a hospital? Or the air quality impacts if it includes auto repair facilities?

Response to Comment No. 393-3

This comment is substantially similar to Comment No. 224-1. Refer to Response to Comment No. 224-1 regarding the proposed uses.

Comment No. 393-4

3. A number of construction trucks will be used in the process of construction. How will large trucks make left hand turns on the streets in the area? Why doesn't the project have any lanes to get trucks and cars off the street? How will it work for trucks to turn into and out of traffic? And from which directions will they be required to come? The project should provide dedicated lanes to make right turn lanes onto project. Please analyze the ability of the project to provide these lanes.

Response to Comment No. 393-4

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 9-22 regarding construction haul routes, truck trips and the proposed CTMP. As discussed therein, three haul routes were selected to comprehensively analyze the potential haul routes and ensure all associated environmental impacts were evaluated in the Draft EIR.

Refer to Response to Comment Nos. 83-1 and 26-E.4-15 regarding turn lanes, truck turns, and maneuvering.

Comment No. 393-5

4. We are in desperate need of housing. Housing is a necessity and will impact the living situation and wellbeing of the community. Why is there no housing in this project? All kinds of housing, including affordable housing? Please show an alternative with housing as part of this project.

Response to Comment No. 393-5

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing and Response to Comment No. 159-4 regarding Alternative 4, which is a mixed-use alternative with an affordable housing component.

Comment No. 393-6

We have seen many mishaps in the past and we would hate for this project to be detrimental to the community.

Response to Comment No. 393-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 393-2 through 393-5.

Comment Letter No. 394

Travis Muroki
427 N. Ogden Dr.
Los Angeles, CA 90036-1710

Comment No. 394-1

I am writing to express my concerns regarding the proposal for the TV City expansion.

Response to Comment No. 394-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 394-2 through 394-7.

Comment No. 394-2

I am concerned about the lack of specifics contained within the plan, particularly when it comes to noise during the construction phase and after the construction is complete.

Response to Comment No. 394-2

This comment is identical to Comment No. 310-2. Refer to Response to Comment No. 310-2, above.

Comment No. 394-3

Construction obviously produces all types of noise: noise from the trucks driving in and out of and on the construction site, from the construction equipment itself, and from the construction activities. What kinds of construction trucks and equipment will be entering the property? What times of day will there be construction activities and which days of the week? Are there certain days and times of the day that we will not have to deal with construction vehicles driving into and out of the area? What permits do these vehicles need, and are they different for the different kinds of equipment? It doesn't seem there has been any acknowledgement of how all this noise and hours of construction will impact residents.

Response to Comment No. 394-3

This comment is identical to the first paragraph of Comment No. 161-2. Refer to Response to Comment No. 161-2, above.

Comment No. 394-4

Where is the information about what kinds of noise, from what sources, and which streets and neighbors are going to be impacted the most and the least? Please don't just tell me where to find the information, as I can't make my way through some long and complicated report. Please respond to those questions above when you respond to this letter. And I want to know how this information was derived—what are the thresholds for noise pollution? Who decides what those thresholds are?

Response to Comment No. 394-4

This comment is identical to the second paragraph of Comment No. 161-2. Refer to Response to Comment No. 161-2, above.

Comment No. 394-5

How was it determined when construction can occur? Are all of the other activities that are happening in the area at the same time taken into account when any analysis of noise levels was done—noise from daily commuting, weekends when more shoppers and visitors may visit the area?

Response to Comment No. 394-5

This comment is identical to Comment No. 161-3. Refer to Response to Comment No. 161-3, above.

Comment No. 394-6

What is going to be done to mitigate the different sources and times of noise? If the project could take three years or it could twenty years, that suggests construction could be ongoing for upwards of twenty years. What construction activities will occur in each of those years and generating what levels of noise? And what steps in each of those years will be taken to keep noise levels to a minimum?

Response to Comment No. 394-6

This comment is identical to Comment No. 310-6. Refer to Response to Comment No. 310-6, above.

Comment No. 394-7

Furthermore, with the number of soundstages that will be added, including outdoor soundstages, what will be the sound dampening efforts to deal with the noise once in use?

What days and hours will the outdoor soundstages be allowed to operate? On what basis is it determined what days and hours of the week those outdoor stages can be used?

Response to Comment No. 394-7

This comment is identical to Comment No. 310-7. Refer to Response to Comment No. 310-7, above.

Comment No. 394-8

The community needs specifics about what the plan is and what the impacts will be. People who live here need clarity and to know exactly how they will be impacted. Telling residents that there will be no impacts is just [sic] true. Thank you for responding to these questions and concerns.

Response to Comment No. 394-8

The claim that the Draft EIR did not identify any impacts is incorrect. Refer to Section I, Executive Summary, of the Draft EIR for a summary of the potential impacts associated with the Project and a list of the PDFs and mitigation measures to be implemented as part of the Project.

The remainder of this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 394-2 through 394-7.

Comment Letter No. 395

Ethan Murphy
531 N. Flores Ave.
West Hollywood, CA 90048-6038

Comment No. 395-1

This project is trying to do way too much on this property that is in an already congested area. It needs to be scaled back substantially. I am all for maintaining the existing studio use, but this location is not appropriate for 1.4 million sf of office and 225' buildings. There is no support in the EIR for why a studio needs this amount and size of office uses to supposedly maintain the studio. Office space attached to and at the height of the stages should be enough, like the applicant showed at the Neighborhood Council meeting. The height is out of character with this area which consists mainly of 1 and 2 story commercial and residential buildings. If the applicant wants to develop a high-rise office project, it should look to the nearby Wilshire corridor which is planned for tall office towers.

Response to Comment No. 395-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The remainder of this comment is identical to Comment Nos. 110-2 and 110-3. Refer to Response to Comment Nos. 110-2 and 110-3, above.

Comment Letter No. 396

Thomas Murphy
Marta Barbosa
351 1/2 N. Orange Grove Ave.
Los Angeles, CA 90036-2147

Comment No. 396-1

We have lived in this neighborhood for 27 years and can attest that traffic is already horrible.

Response to Comment No. 396-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 396-2 through 396-5, below

Comment No. 396-2

This project is likely to bring thousands of workers and audience people a day. What happens when they park in the community?

Response to Comment No. 396-2

Refer to Topical Response No. 10, Trip Generation, regarding employee and audience trips.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 396-3

Speeding through our neighborhood at all times of the day and night, coupled with hundreds of massive trucks, and impacting the air quality will profoundly affect our quality of life for years to come.

Response to Comment No. 396-3

Air quality was fully evaluated in Section IV.A, Air Quality, of the Draft EIR. This comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 396-4

Construction noise during the day and from all of the shows at night will further impact our daily lives.

Response to Comment No. 396-4

Noise during both construction and operation is fully analyzed in Section IV.I, Noise, of the Draft EIR.

Comment No. 396-5

And obviously, thousands of people pouring in our streets will create safety issues—will there be sufficient police coverage if hundreds or even thousands of people are walking around and parking on our streets every day?

Response to Comment No. 396-5

Refer to Topical Response No. 13, Parking, regarding a discussion of the adequacy of the proposed on-site parking supply and that spillover parking into adjacent neighborhoods and properties is not anticipated. The Project will provide a convenient and sufficient parking supply on the Project Site, available to all employees and visitors, in addition to an NTMP. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan. In combination, these are the most effective safeguards to prevent spillover parking. Therefore, spillover parking into the nearby residential neighborhoods and commercial properties is not anticipated. Accordingly, Project Site visitors are also not anticipated to be walking in the surrounding neighborhoods.

Refer to Response to Comment No. 16-5 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment Letter No. 397

Paulette Nessim
10330 Rochester Ave.
Los Angeles, CA 90024-5354

Comment No. 397-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 397-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 398

Eric Netherland
438 N. Ogden Dr.
Los Angeles, CA 90036-1769

Comment No. 398-1

I've recently learned of the purchase and expansion of the CBS building on Beverly and Fairfax avenues. As a resident of this neighborhood, I welcome the growth for the local Television business but I have a few concerns.

Response to Comment No. 398-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 398-2.

Comment No. 398-2

Primarily the potential increase in traffic and parking in an already congested area. For myself and my wife the solution is simple but rarely implemented and that is to increase and improve our public transit, bike paths, and walkability.

A comprehensive bus, train system that is safe and frequent would go a long way to improving the neighborhoods [sic] sound and air pollution and to decreasing the traffic issues. Parking and safety would also benefit proportionally.

For those that are able, biking would be a healthier commuter solution but this is not considered safe enough without a well thought-out bike path system.

For those that cannot walk, bike, or take public transit, a ride share plan that compensates workers for their additional cost could be implemented. This would also mitigate traffic and reduce parking.

Public transit needs to improve to become more used and more popular. A large project funded at this level has the opportunity to significantly move us toward this goal. I encourage you to use your resources to promote healthier and less impactful type of commuting and to work with the city to build, purchase, and employ a less car-centric plan.

Response to Comment No. 398-2

This comment, providing a general statement on the traffic conditions in the area and the City's public transit system and bicycle network, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Topical Response No. 15, Transportation Improvement Program, which discusses the Project's transit program aimed at reducing vehicle trips and promoting public transit usage. One of the key features of the Project's transportation plan is the development of a privately-funded shuttle bus system to directly connect the Metro D Line Wilshire/Fairfax Station currently under construction to the Mobility Hub on the Project Site. This shuttle system would allow Project employees and visitors to seamlessly use the public investment already being made in the subway system to reach the Project Site. See Topical Response No. 7, Mobility Hub, and Topical Response No. 11, Transportation Demand Management.

Refer to Response to Comment No. 16-72 regarding the Project's pedestrian-oriented design, which would enhance walkability around the Project Site.

Comment Letter No. 399

Irene Nicolai
338 S. Citrus Ave.
Los Angeles, CA 90036-3036

Comment No. 399-1

I am more than worried about this potential Television City expansion.

Response to Comment No. 399-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 399-2 through 399-5.

Comment No. 399-2

We as a community are basically in the dark. There is a Draft EIR, but it only provides fragments of information of what the developer might do.

Response to Comment No. 399-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed there in, the Project Description in the Draft EIR is accurate, stable, and finite and the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 399-3

I am particularly concerned about the environmental impact on the community. Will there be explosions from the gas underground when the construction workers must excavate? What is the risk of that happening? Will this action release gas into the environment, such as methane? And what is the developer going to do about gas that is released into the air?

Response to Comment No. 399-3

Significant impacts related to the release of hazardous gases are not anticipated. Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-87 regarding methane and subsurface gases.

Comment No. 399-4

Please provide the scientific data about the gases released due to excavation. What other sources of emissions from gases and toxins could be emitted? How will this impact the air in the neighborhood and to LA's air quality? Aren't we already in a non attainment area when it comes to air quality? What is the developer's commitment to reducing methane emissions and other pollutants into our environment and to combatting climate change in our community and globally?

Response to Comment No. 399-4

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, 16-85, and 26-78 regarding the Draft EIR's discussion of soil and groundwater contamination, including among other things, the extent and source of contamination, under existing conditions and the proposed Project. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane and its mitigation. Refer to Response to Comment No. 26-86 for a discussion of emissions from excavation of potentially contaminated soils and groundwater and related health risk impacts. As discussed in Response to Comment No. 26-99, methane is a naturally occurring gas found in the subsurface within the City of Los Angeles Methane Zone. As such, outside the buildings and structures, the naturally occurring methane will continue to escape and dissipate at the surface at the regular, natural rate. This would not be considered a new source of methane emissions. Refer to Response to Comment No. 26-75 for a discussion of the Project's less than significant GHG impacts and PDFs that would reduce GHG emissions. Please note that Table IV.A-1 (Ambient Air Quality Standards) on page IV.A-2 of the Draft EIR acknowledges that the Air Basin is non-attainment for ozone.

Refer to Subsection 5.i in Section II, Project Description, of the Draft EIR regarding the Project's commitment to sustainability.

Comment No. 399-5

The traffic impacts will be significant, both during construction and in the years to come. It appears the EIR uses a calculation or estimate that employees in Los Angeles commute 6.7 miles per day. Is this accurate? Is that one way or round trip. That can't possibly be right. On what basis is that number? When was it calculated? Was it studied during Covid when many people were not commuting to work? Most people in LA commute much more than a 6.7 miles distance. Also, what about all of the other kinds of driving, not just commuting to and from a job.

Response to Comment No. 399-5

As shown in Table I-1, Summary of Impacts Under the Project, in Section I, Executive Summary, of the Draft EIR, transportation impacts associated with the Project would be less than significant. Details that provide substantial evidence in support of that conclusion are provided in Section IV.K, Transportation, and Appendix M, Transportation, of the Draft EIR.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 399-6

These are the kind of significant issues and questions that need to be addressed.

Thank you for your time and for answering my questions.

Response to Comment No. 399-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 399-2 through 399-5.

Comment Letter No. 400

Nima and Claudine
404 N. Harper Ave.
Los Angeles, CA 0048-2221

Comment No. 400-1

I am upset and have questions about several things presented in the EIR for the Television City Project.

Response to Comment No. 400-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 400-2 through 400-5.

Comment No. 400-2

1. Will the project pump groundwater? How much groundwater? When during the project timeline will groundwater pumping occur and for how long? Won't that potentially cause contamination of the groundwater that we use? How will this groundwater be disposed of? How this crucial part of the project is going to be done needs to be made more clear.

Response to Comment No. 400-2

This comment is identical to Comment No. 247-2. Refer to Response to Comment No. 247-2, above.

Comment No. 400-3

2. This project is right nearby the La Brea Tar Pits. Any amateur paleontologist would tell you there could be a variety of fossils in the area. What will be the impact of project activities on resources in the ground such as fossils? Where is the analysis to identify those potential resources, and what does were the findings? If fossils do end up being unearthed, what steps will be taken to handle those artifacts? Will construction be shut down so that a full and proper examination of the area be done?

Response to Comment No. 400-3

This comment is identical to Comment No. 247-3. Refer to Response to Comment No. 247-3, above.

Comment No. 400-4

3. The EIR says that events and filming could be held outdoors. What kinds of events would be held? Do the different kinds of events require different permits or fall under different regulations? Different kinds of outdoor activities obviously can cause serious noise in the area, as well impact the community. How is outdoor activity handled differently from a safety and noise perspective? Will scenes with guns be filmed?

Will there be large audiences or casts if filming? Or large crowds attending if [sic] an event? What hours will events be allowed? What hours would filming be allowed to be done? It looks like the studio is going to be surrounded by houses, which seems dangerous at best, and definitely residents who will be affected. More analysis is needed; where is the detailed information about all these outdoor activities and the specifics about the impacts associated with the different kinds of outdoor events and outdoor filming?

Response to Comment No. 400-4

This comment is identical to Comment No. 247-4. Refer to Response to Comment No. 247-4, above.

Comment No. 400-5

4. What are all the project features it says in the EIR that the studio will use to keep bad things from happening?—everything from greenhouse gasses, to noise, and traffic are dealt with by these features. There doesn't seem to be master list of all of them in the EIR. Who at the city is responsible for keeping track of them? And how do we know they will actually be implemented. And shouldn't we know what the impacts are instead of being masked by something called project features? Please outline what those actual "features" are and what the impacts will be if the features aren't actually built or implemented.

Response to Comment No. 400-5

This comment is identical to Comment No. 247-5. Refer to Response to Comment No. 247-5, above.

Comment No. 400-6

A lot of people promise a lot of things, but what is important are the mechanisms to make sure they are done. Please let me know what that is.

Response to Comment No. 400-6

This comment is identical to Comment No. 247-6. Refer to Response to Comment No. 247-6, above.

Comment Letter No. 401

Steve Nori
458 N. Laurel Ave.
Los Angeles, CA 90048-2351

Comment No. 401-1

The Adobe and Farmers Market are true community landmarks and important to the community. How will the expansion of Television City affect the Adobe? During construction, it seems they would be impacted by construction noise, dust, and debris, so what will those impacts be? How much blasting, drilling, and other construction activity will there be to impact it? Won't visitor to the Farmers Market be impacted by the noise, traffic and daily construction? What steps are being taken to ensure the increased traffic and people coming into the area does not displace regular customers and visitors?

Response to Comment No. 401-1

This comment is identical to Comment No. 214-4. Refer to Response to Comment No. 214-4, above.

Comment No. 401-2

I understand there will be power generators at the basecamps. Since generators often run on diesel fuel, how will the pollution, both air and noise, be handled? How often will the generators be used? What will be they be used for? What about safety and hazard concerns?

Response to Comment No. 401-2

This comment is identical to Comment No. 214-5. Refer to Response to Comment No. 214-5, above.

Comment No. 401-3

We have seen every time there is development of this magnitude, promises are made but are never kept. The applicant mentions many possible enhancements that could be made, but where are the specifics as to what the applicant has committed to doing? Please detail those improvements and enhancements. Will they be made just to the site? Or are any being promised in the actual surrounding neighborhood? What are those? When will they be made? What is the schedule the community can expect to see those done?

Response to Comment No. 401-3

PDFs, including off-site improvements, that would be implemented as part of the Project are identified on pages I-16 through I-29 in Section I, Executive Summary, of the Draft EIR. The timing for implementation of these PDFs is provided as part of the Mitigation Monitoring Program, which is included as Section IV of this Final EIR.

Refer also to page II-30 of Section II, Project Description, of the Draft EIR, which provides a description of the improvements to the public realm included in the Project. These include, but are not limited to, new and, in some locations, widened sidewalks; parkways providing planting areas for street trees, shrubs, and groundcover; fencing, walls, and landscaped buffers; and berms and other visual screening to conceal parking areas.

Comment Letter No. 402

Aselle Nova
6270 Jackie Ave.
Woodland Hills, CA 91367-1422

Comment No. 402-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 402-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 403

Erik Oh
439 N. Vista St.
Los Angeles, CA 90036-5742

Comment No. 403-1

I am worried about the environmental consequences of this project. As a community resident, I need to know the plans to transform my community will not destroy it in the process. In the DEIR, I read that the developers are planning to excavate down about 45 feet, removing over 700,000 cubic yards of dirt. I kept reading to see if there was any more information about any of the potential impacts, yet there are just two pages failing to provide a meaningful analysis.

Response to Comment No. 403-1

This comment is identical to Comment No. 323-1. Refer to Response to Comment No. 323-1, above.

Comment No. 403-2

Excavating down nearly 45 feet will likely lead to the discovery of historic resources. Archaeological excavation takes patience, and discovering dinosaur bones or other artifacts may occur. How will the developers plan on excavating all of this dirt while not damaging the resources in the ground? If anything is found, who will the artifacts be given to? What will be the chain of custody for anything found? Will the project construction be stopped until the affected area is thoroughly examined by archeologists? These details are essential to protecting the Beverly Fairfax Historic District.

Response to Comment No. 403-2

This comment is identical to Comment No. 323-2. Refer to Response to Comment No. 323-2.

Comment No. 403-3

Where will the dirt taken be disposed of and what research will be conducted to ensure that the dump site will not have any damage? I believe that it is important not only that the district's land will be okay but also that this does not raise environmental concerns for another area. On a more logistical note, what time of day will the excavation take place? And how many days per week? If the plan is agreed on, I will need to be waking up earlier

in anticipation of the traffic so I am concerned that I could be spending a long time waking up to the digging.

Response to Comment No. 403-3

This comment is identical to Comment No. 323-3. Refer to Response to Comment No. 323-3, above.

Comment No. 403-4

For years, tar preserved the bones of trapped animals at La Brea Tar Pit yet the developers are not considering that this excavation could unveil the bones of ancient animals. How far will the excavation site be from this landmark? If the developers plan on using massive excavators, how long are they planning on spending on excavation while looking for resources? These excavators can carry 19 to 24 tons—spotting an ancient bone would be like finding a needle in a haystack.

Response to Comment No. 403-4

This comment is identical to Comment No. 285-4. Refer to Response to Comment No. 285-4, above.

Comment No. 403-5

Until my concerns about Beverly Fairfax's historic and cultural resources are addressed, I will urge my neighbors to stand up against the project

Response to Comment No. 403-5

This comment is identical to Comment No. 285-5; nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 404

Sean O'Leary
Calsak Plastics
19801 S. Rancho Way, Unit B
Rancho Dominguez, CA 90220-6316

Comment No. 404-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 404-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 405

D. Ariela Olivas
611 N. Spaulding Ave.
Los Angeles, CA 90036-1881

Comment No. 405-1

Hello. I am writing regarding the proposed Television City 2050 construction near my home. I have a lot of concerns and questions about this. If it is handled poorly, and the plans do not look good, it could be a complete catastrophe for those of us who live in the neighborhoods Television City borders. This project is way too big for the neighborhood.

Response to Comment No. 405-1

Regarding the size of the Project, refer to Response to Comment No. 11-3. This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 405-2 through 405-9.

Comment No. 405-2

I am not looking forward to the overflow of parked cars, drivers, and pedestrians into my neighborhood, which is where many of them will wind up if this goes through as planned.

Response to Comment No. 405-2

Under SB 743, the adequacy of a new development's parking supply and congestion are not CEQA considerations. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. The Project no longer proposes off-site parking; the Project's parking supply and demand would be entirely accommodated on-site; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 405-3

Here are the questions I have regarding Television City and what might be coming to my neighborhood:

- 1.) As I mentioned, the overflow of cars and drivers into my neighborhood is a major concern for me. With thousands of visitors coming to the site each day, and nowhere near enough parking planned, what is going to happen when these visitors park on the residential streets surrounding the site? How can you even ensure that won't happen, and when it does, what controls are going to be put in place?

Response to Comment No. 405-3

See Response to Comment No. 405-2. As discussed in Topical Response No. 13, Parking, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. As also discussed in that topical response, elimination of long-term parking by non-residents in residential neighborhoods can most easily be accommodated by the institution of a residential parking permit district whereby local residents and their guests are allowed to park on the public streets within a parking district, usually during standard business hours. The neighborhoods to the north and west of the Project Site already have residential parking permit systems. Under the NTMP that is proposed as a condition of approval for the Project, this system could be further evaluated and expanded upon with neighborhood input. Strategies that could assist in addressing neighborhood concerns include modifying the time limits or the process for obtaining a permit, maintaining consistent enforcement, and/or making the permit system more effective.

Comment No. 405-4

- 2.) Speeding and careless driving are already major concerns here. What is going to be done to ensure the safety of pedestrians in the residential neighborhoods?

Response to Comment No. 405-4

The issue of speeding cars on the arterial street system is a matter of law enforcement and roadway design. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for a description of the neighborhood traffic planning process and goals. In working with the neighbors, the NTMP will identify strategies and improvements to reduce speeding in the neighborhoods with the goal of increasing safety.

Comment No. 405-5

- 3.) Has there been a study done to see how it is going to impact traffic on residential streets due to this influx of parking?

Response to Comment No. 405-5

Refer to Response to Comment No. 405-2 regarding the non-CEQA cut-through analysis. As discussed in Topical Response No. 13, Parking, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 405-6

Has there been a study to see how this extra traffic, with more exhaust and idling cars when backed up, is going to impact air quality in the area?

Response to Comment No. 405-6

Refer to Response to Comment No. 124-3. Please refer to page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, which shows that off-site vehicle trips associated with the Project would not approach screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects.

Comment No. 405-7

- 4.) Beverly and The Grove Drive are two important streets in our area. Beverly is heavily trafficked and The Grove Drive is home to apartment buildings and parking garages. These two streets are going to be overloaded as the only entrances for parking to the Television City site. Please provide information on how this is going to impact traffic on these streets and the impacts to the side streets that intersect with them.

Response to Comment No. 405-7

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-17 regarding access and use of The Grove Drive. Topical Response No. 12 provides a discussion of the queuing provided at each signalized entrance to the Project Site, to prevent queuing into surrounding streets.

Comment No. 405-8

- 5.) The Farmer's Market is an important fixture both for our neighborhood and the city as a whole. What is going to be done when parking for the Farmer's Market is taken up by employees and visitors can't park at the new development? Where have you evaluated the impacts of parking in other business parking lots and what were the findings?

Response to Comment No. 405-8

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Section C, Spillover Parking into Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking, for a discussion of parking effects of the Project on The Original Farmers Market. Project parking would not affect The Original Farmers Market.

Comment No. 405-9

- 6.) Regarding the residential streets that make up the bulk of the community here, these streets are narrower than the main streets surrounding the project. There are plenty of narrow streets that are filled with parked cars now, and a car has to wait until an oncoming car goes by in order to then proceed. Did you study those narrow streets for the expected additional cars driving through the neighborhood? How will you prevent trucks, trying to avoid gridlock on the main streets, from driving on those narrow streets?

Response to Comment No. 405-9

Refer to Response to Comment No. 405-2 and Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Regarding trucks on residential streets, trucks would not be allowed on residential streets. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD. A Construction Manager would be appointed by the Project, and his/her phone number would be advertised on the Project website and communicated to the neighbors so that trucks on the local streets could be reported to the Construction Manager, who, in turn, could call for targeted enforcement.

Comment No. 405-10

These are just some of the concerns that come up when I think about this project. Please consider the residents before giving this the go ahead. These plans have not been fully thought out and they need to be!

Response to Comment No. 405-10

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 405-2 through 405-9.

Comment Letter No. 406

Collin Olympius
1830 W. 36th St.
Los Angeles, CA 90018-3813

Comment No. 406-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 406-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 407

Gerard Oropeza
20623 Lisa Gail Dr.
Santa Clarita, CA 91350-1982

Comment No. 407-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 407-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 408

Lisa Oropeza
7961 Blackburn Ave., Apt. 2
Los Angeles, CA 90048-4442

Comment No. 408-1

Are studios important employers here? Sure. We all know this is a vital industry for Los Angeles. However, I am concerned about how my area will take on all of consequences of what is being proposed to expand the studio facilities at Television City because this is a major project, and one that does not fit in our neighborhood.

Response to Comment No. 408-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 408-2 through 408-7.

Comment No. 408-2

First, the studio expansion will bring thousands of new employees driving thousands of cars. These workers won't all be from this area, and so my biggest question is, where will they all park? It seems like the studio's parking is already maxed out, and the EIR says that more than 5,000 new parking spaces are required. Where is that additional parking going to go? Is it going to spill into the neighborhood? And if they build these large parking structures, how will anyone get out of them during rush hour?

Response to Comment No. 408-2

This comment is identical to Comment No. 355-2. Refer to Response to Comment No. 355-2, above.

Comment No. 408-3

And what happens if there is an emergency during that time? How will emergency response vehicles be able to get to Cedars Sinai in an emergency? There is gridlock now that can keep an EMT vehicle stuck, not being able to get through bottlenecks in traffic. The application seems to minimize the problem so what assumptions were used in studying this issue?

Response to Comment No. 408-3

This comment is identical to Comment No. 355-3. Refer to Response to Comment No. 355-3, above.

Comment No. 408-4

The studios are in the business of promoting themselves and the movies and TV shows they make. What is the plan for billboards and advertising signage in the area? Will the planned signage be distracting? Will it block views? How large? We already have a lot signs in the area, and to me, it overly commercializes the area and cheapens the place where we live. Will there be a limit to the kinds, size and amount of signage to make sure it isn't splattered everywhere? It's Hollywood. They are in the business of "big, big and bigger!" How do we keep the signs from doing the same? Are there regulations to stop these billboards being lit up at night? Will video boards be allowed? Let's be real.

Response to Comment No. 408-4

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR. Also refer to Response to Comment Nos. 26-129 and 213-2 regarding off-site signs and billboards, which would not be permitted under the proposed Sign District. Refer to Response to Comment No. 26-129 regarding digital signage. Note that pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts (including impacts with respect to lighting and views) shall not be considered significant impacts on the environment and, therefore, do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.

Comment No. 408-5

These types of billboards are a blight on the community and use a huge amount of energy.

Response to Comment No. 408-5

Refer to Response to Comment Nos. 26-129 and 213-2 regarding billboards, which would not be permitted under the proposed Sign District. Refer to Response to Comment No. 102-6 regarding energy usage for signage.

Note that pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic

impacts (including impacts with respect to lighting) shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.

Comment No. 408-6

Finally, what is the studio doing to let people work from home and limit traffic and congestion? Zoom meetings work, and remote working should be factored into new large-scale employers coming into the area. Where is the study that looks at how many of the new employees can do some of those expected jobs remotely? How many staff could be impacted? People can collaborate over vast distances effectively, and don't need to commute across town to sit in an office and type on a computer.

Response to Comment No. 408-6

The trip generation estimates in the Transportation Assessment (Appendix M.1 of the Draft EIR) are based on pre-pandemic conditions when remote working was uncommon. Therefore, the trips estimated represent a conservative (i.e., high) estimate of the likely trips to be generated by the Project. While many of the studio employees would have to be on-site to perform their duties, certain office workers can work remotely at least part of the time, and this practice would reduce the vehicle levels below those shown in the Draft EIR.

The remainder of this comment discusses non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 408-7

What is the smallest footprint possible for the objectives of the development? Sure they need sound stages to make big action movies, loud ones at that, but do they need thousands of square feet of office space? Did anyone look at a different set of options that maybe only included the production facilities and not all the offices? What offices are actually going to be used and for what purposes?

Response to Comment No. 408-7

This comment is identical to Comment No. 355-4. Refer to Response to Comment No. 355-4, above.

Comment No. 408-8

This all seems like too much for my community to take in, especially since there have to be other viable options. Please listen to the community and take another look at whether this project is really necessary.

Thank you for listening.

Response to Comment No. 408-8

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 408-2 through 408-7.

Comment Letter No. 409

Allison Osario
908 N. Genesee Ave., Apt. 3
West Hollywood, CA 90046-7375

Comment No. 409-1

I am very concerned about a number of issues with the plan for development at Television City.

Response to Comment No. 409-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 409-2 through 409-8.

Comment No. 409-2

One of my main concerns is the parking situation.

Response to Comment No. 409-2

This comment provides a general statement on parking and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 409-3

I have lived here for 8 years. The plan for parking seems very unrealistic given the number of workers, employees and visitor expected on a daily and regular basis. Please explain more clearly how parking will be distributed around the property? Which roads will be used to enter and exit? Will trucks enter and exit from those same places during construction? How many parking areas are there going to be in total? What exactly is planned for parking on Grove Drive? In each parking area, how many cars will be able to fit? Is truck parking accounted for, or is that a separate issue? If it is a separate issue, please detail those plans in your response to this letter.

Response to Comment No. 409-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, regarding access and use of The Grove Drive.

During construction, trucks would enter and exit the Project Site from both Fairfax Avenue and Beverly Boulevard. Once the Project is completed, trucks would primarily use the three signalized entrances to the Project Site.

Truck parking would take place on-site primarily in the basecamp areas surrounding the sound stages and in an underground level below Project Grade.

Comment No. 409-4

Is parking going to be free for employees and visitors? If not, how much will it cost?

Response to Comment No. 409-4

As discussed in Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of Topical Response No. 13, Parking, the Project would provide convenient and sufficient on-site parking to its employees and visitors to meet its full demand. Project employees and visitors would be provided with temporary or long-term parking credentials. Audience members would be pre-screened and provided with access to parking facilities for the duration of their visit to the Project. Retail customers would be provided a time-limited grace period and would require further validation or provision of a fee beyond the initial time period.

The cost of parking is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 409-5

What about parking during events—where will that parking be? Will it be the same if the events are held during the day or held at night?

Response to Comment No. 409-5

Parking would be entirely provided on-site and no off-site parking is proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Refer to Section A, Parking Supply, of Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project.

Comment No. 409-6

Already in our neighborhood, it can be difficult to find parking. My street has both apartment buildings and homes. The streets in our neighborhoods are lined with cars now, and it can be hard to pass cars driving in both directions because so many streets are narrow. What assurances are the surrounding neighborhoods going to have that the project is not going to make that situation even worse with works, employees and visitors parking on our neighborhood streets? Those assurances need to be backed up, not just our being told “we are sure these folks aren’t going to park in your neighborhood.”

Response to Comment No. 409-6

Under SB 743, the adequacy of a new development’s parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. Also refer to Topical Response No. 9, Neighborhood Traffic Management Plan, for a discussion of a program in which the neighbors adjacent to the Project Site will work with the Applicant and LADOT to identify traffic and parking strategies to protect the neighborhoods from cut-through trips and spillover parking.

Comment No. 409-7

What is the plan for where all of the construction trucks are going to park? Will they be parking onsite only and for the entire time? What about if they are not in active use? My neighbors and I are extremely concerns that large trucks will try to drive down our narrow streets. What is the plan to ensure this does not happen?

Response to Comment No. 409-7

All construction haul truck staging and parking, as well as construction worker parking, would be accommodated on-site. Refer to Topical Response No. 14, Construction

Vehicle Impacts, and to Response to Comment No. 157-2 regarding parking during construction. Refer to Response to Comment Nos. 178-3, 183-1, and 231-4 regarding off-site staging. All haul truck staging locations would be provided on-site; accordingly, no haul trucks would be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Project construction trucks would not be permitted to drive on residential streets. If they do, neighbors would have the contact information for the Construction Manager, and they can report any trucks violating the residential streets. These trucks would be subject to citations written by LAPD.

Comment No. 409-8

Parking is one of those things that can really bottle neck and disrupt a neighborhood, so it is especially important that the community be given direct and true information.

Response to Comment No. 409-8

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment Letter No. 410

Conor O'Sullivan
457 1/2 N. Hayworth Ave.
Los Angeles, CA 90048-2703

Comment No. 410-1

I have lived in this area for 18 years.

Response to Comment No. 410-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 410-2

I am concerned what this will do to our traffic and it's effect on our public parking.

Response to Comment No. 410-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Accordingly, public parking would not be affected.

Comment No. 410-3

If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with the consequences of the increased pollution, noise and traffic, the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—

because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 410-3

This comment is identical to Comment No. 114-5. Refer to Response to Comment No. 114-5, above.

Comment No. 410-4

Thank you for your time.

Response to Comment No. 410-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 411

Ara Ouzounyan
ara.ouzounyan@tvcityla.com

Comment No. 411-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 411-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 412

Jason Paich
317 1/2 Stanley Ave.
Los Angeles, CA 90036-2328

Comment No. 412-1

I am writing to you with a serious concern regarding the developer's plan because I believe that more needs to be done to protect the environment. With our planet's surface temperature rising at a dangerous speed, I am concerned about this project's lack of environmental and social responsibility. Renewable energy is our future. Solar, geothermal, hydroelectric, wind, and biomass energy are used more and more as climate change becomes a growing concern.

Response to Comment No. 412-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 412-2 through 412-5.

Comment No. 412-2

I read in the EIR that the project might not be complete until 2045... why is renewable energy not in the developers plan for the project? In twenty years, the project's energy use could be completely outdated, inefficient and damaging to the environment to me. What percentage of the developer's most recent projects uses electricity? I want to know about previous projects that have been electrified.

Response to Comment No. 412-2

Refer to pages IV.C-43 to IV.C-44 in Section IV.C, Energy, of the Draft EIR, which includes an analysis of Project energy impacts under a long-term buildout scenario. As discussed therein, a long-term buildout would result in an overall reduction in energy use due to improved efficiencies and more stringent requirements in the future.

Refer to Response to Comment Nos. 45-1 and 77-4, which detail the sustainability features included in the Project, the Project's compliance with the City's new all-electric buildings ordinance, and new natural gas usage associated with the Project. Regarding renewable energy, Table IV.C-2 (Summary of Net Annual Energy Use During Project Operation) of the Draft EIR shows that the Project's solar generation (i.e., Project Design

Feature GHG-PDF-2) would result in an approximately 383,000-kWh increase in production relative to existing conditions.

The remainder of this comment discusses topics that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 412-3

I am concerned about the use of diesel fuel in the projects. At basecamps, will the power generators run on diesel fuel? How are toxic emissions going to be dealt with? I am concerned about the health and safety of my community and need information about the measures the developers will take.

Response to Comment No. 412-3

This comment is substantively similar to Comment No. 188-4. Refer to Response to Comment No. 188-4, above.

Comment No. 412-4

What will the noise levels for the generators be during the day and during the night? If they plan on emitting toxic chemicals into the air that my children and I breathe, is it really necessary to keep me up at night, too?

Response to Comment No. 412-4

Refer to Response to Comment No. 188-4. Generators associated with filming are included in the air quality and noise analyses in the Draft EIR. Refer to Table IV.A-7 on page IV.A-64 of Section IV.A, Air Quality, and page IV.I-44 in Section IV.I, Noise, of the Draft EIR, respectively. As discussed therein, the Project's operational air quality and noise impacts would be less than significant. Also refer to Response to Comment No. 1-3 regarding how future emissions from new generators will substantially decrease in comparison to existing emergency generators. Furthermore, during operation of the Project, emergency generators will be included for emergency use during a power outage and regularly tested for maintenance purposes but otherwise will not be used to provide power to basecamps, which will be outfitted with electric tie-ins, which reflects the City's new all-electric buildings ordinance (refer to Response to Comment No. 155-4). Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project would be below the applicable significance thresholds and impacts would be less than significant.

Refer to Response to Comment No. 26-138 for a discussion of noise exposure and hearing loss.

Comment No. 412-5

How much money will it cost for the project to be 100% electric? I do not want to support a company that will spend heinous amounts of money to build not one, not two, but fourteen stages in the concert arena instead of allocating a portion of those proceeds to eliminate the need for power generators to be used at the basecamps.

Response to Comment No. 412-5

The comment regarding cost does not concern an environmental issue under CEQA. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please refer to Response to Comment No. 26-51 regarding the City's new all electric ordinance, which the Project would comply with.

The Project does not include any concert arenas. Refer to Topical Response No. 3, Permitted On-Site Uses, regarding the five studio land uses that would be permitted under the proposed Specific Plan.

Refer to Response to Comment No. 26-36 regarding basecamp power.

Comment No. 412-6

Until specific information is distributed about the energy use plan, I will continue to advocate against this project.

Response to Comment No. 412-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 413

Tracey Paleo
417 N. Gardner St.
Los Angeles, CA 90036-5754

Comment No. 413-1

I have significant concerns with the TVC 2050 project and how it will impact access to public transit and non-vehicle access in the Beverly-Fairfax area.

Los Angeles is a car-intensive community and walking or biking in our city can be perilous at times. I'm concerned that the intensity of the construction work for TVC 2050 and the length of time construction will be ongoing will make my neighborhood practically unlivable.

Response to Comment No. 413-1

This comment is identical to Comment No. 234-1. Refer to Response to Comment No. 234-1, above.

Comment No. 413-2

The draft EIR for this project calls for the excavation of 700,000 cubic yards of dirt. That means a tremendous number of trucks entering and leaving the site to remove not just soil but demolition debris as well. How is this going to impact the air quality of the neighborhood? What are the plans for making sure all the dust from this project doesn't find its way into our lungs?

Response to Comment No. 413-2

This comment is identical to Comment No. 234-2. Refer to Response to Comment No. 234-2, above.

Comment No. 413-3

Will blasting be required during any of the phases of construction? When during construction and how much blasting? What days and times? How will neighborhood residents be notified?

Response to Comment No. 413-3

This comment is identical to Comment No. 234-3. Refer to Response to Comment No. 234-3, above.

Comment No. 413-4

The draft EIR also seems to suggest a significant portion of the visitors to TVC 2050 once production starts will take mass transit to get there. How do they arrive at their projections? Will this increase in the number of mass transit users crowd out neighborhood residents who use mass transit for commuting and errands?

Response to Comment No. 413-4

This comment is identical to a portion of Comment No. 234-4. Refer to Response to Comment No. 234-4, above.

Comment No. 413-5

If visitors to TVC park on residential streets or at the Farmer's Market, will neighborhood residents be inconvenienced?

Response to Comment No. 413-5

This comment is identical to a portion of Comment No. 234-4. Refer to Response to Comment No. 234-4, above.

Comment No. 413-6

Please provide more detailed answers and information.

Response to Comment No. 413-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 413-2 through 413-5.

Comment Letter No. 414

Cathy Palmer
511 N. Fuller Ave.
Los Angeles, CA 90036-1940

Comment No. 414-1

I am a 50 year resident of Beverly Fairfax. I am writing to express my concerns about the plan for the Television City project presented in the draft EIR.

Response to Comment No. 414-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 414-2 and 414-3.

Comment No. 414-2

My primary concern is this project's impact on the environment. This huge enlargement of the complex in a residential area will create adverse health effects on community members. There is no way that all of the additional cars, various kinds of truck traffic, added noise, increased water usage and more will not have an adverse effect. What kind of studies have been conducted to examine each potential cause of adverse health impacts? If they have not yet been conducted, when will they be? When will the findings be released to the community? On what basis can the city approve a project if it is found to have any adverse health effects at all on people, not just "significant" health effects?

Response to Comment No. 414-2

The Project is located in a mixed commercial and residential area. The Project would represent the continuation and expansion of an existing studio complex in an urban commercial area. The Project's Draft EIR, which has been made available to the public for review, measures the impacts of the Project on a wide variety of technical and environmental issue areas. The transportation analysis in the Draft EIR (Appendix M.1 of the Draft EIR) showed that the Project would not have a significant transportation impact related to VMT, plan consistency, geometric hazards, or traffic safety. Air quality and noise analyses during both construction and operation of the Project have been completed in accordance with CEQA and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively. As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operation emissions. All other air quality impacts would be

less than significant or less than significant with mitigation. As discussed in Section IV.I, Noise, of the Draft EIR, the Project would result in significant and unavoidable on- and off-site noise and vibration impacts during construction. All other noise impacts would be less than significant, including those associated with operational traffic.

Water supply is analyzed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR. As discussed therein, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operational impacts on water supply would be less than significant.

A quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the points of maximum impact (PMIs), even after accounting for increased truck trips associated with future operations, would be below SCAQMD's risk thresholds, further affirming the statements on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of toxic air contaminants would result in a less than significant impact.

Comment No. 414-3

These trucks will also increase the noise level, which can disrupt our sleep and increase stress. This problem will persist after construction concludes, as making movies can be noisy too. What noise level analyses have been conducted with a set development plan? How can I be sure they will be accurate?

Response to Comment No. 414-3

This comment discusses issues that are similar to those in Comment No. 147-3. Refer to Response to Comment No. 147-3, above. Refer to Response to Comment No. 26-138 for a discussion of noise exposure and hearing loss.

The noise analysis included in Section IV.I, Noise, of the Draft EIR was conducted in accordance with CEQA and City guidelines and is based on the Conceptual Site Plan. Refer to Response to Comment No. 236-4 regarding noise impacts associated with truck trips. With the exception of trucks associated with concrete mat pour activities (which would occur for a maximum of five days), construction trucks would be used during daytime hours and, thus, would not result in sleep disturbance. As provided in Response to Comment No. 26-146, the estimated noise levels associated with outdoor production and basecamp productions at off-site residential and hotel/motel uses during the nighttime hours would be less than under existing conditions. Therefore, Project operation would not result in sleep disturbance.

Comment No. 414-4

Until I receive answers to my questions above, I urge that this project be rejected. I look forward to hearing what steps will be taken to resolve the issues I have outlined.

Thank you for your time and consideration.

Response to Comment No. 414-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 415

Katrina Palmer
455 N. Ogden Dr.
Los Angeles, CA 90036-1753

Comment No. 415-1

The safety impacts of the Television City project will be tremendous and I feel the EIR does not adequately address all of them and how they will be mitigated. I am concerned about the traffic this will bring to our area.

Response to Comment No. 415-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 415-2 through 415-6.

Comment No. 415-2

The mobility hub sounds like an area of the development where a lot of activity could be happening, and it could attract people who hang out there rather than passing through. How will the city keep people legitimately using the hub safe? What will the police presence be at the mobility hub? How will the people using the hub for non-transportation needs (i.e. people who have nowhere else to go or someone looking for a quick buck) be handled?

Response to Comment No. 415-2

With regard to the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment No. 16-5 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 415-3

There will be special events held at the site. What limits have been determined for special events in terms of the number of people and does it depend on the kind of event? How often will these events be held, weekly, monthly? And what days of the week and hours will these special events be held? Will specific or different equipment be brought in and for what purpose? Are there any special events that will not be allowed there, if so what are

those? Where will guests attending these events be directed to park? How has the additional noise from these events been analyzed and how will it impact not only those attending but the neighbors? The potential impacts of increased noise levels are often overlooked.

Response to Comment No. 415-3

The first six sentences of this comment are identical to Comment No. 102-2. Refer to Response to Comment No. 102-2, above.

The seventh sentence of this comment is identical to Comment No. 102-3. Refer to Response to Comment No. 102-3, above.

The last two sentences of this comment are identical to Comment No. 102-4. Refer to Response to Comment No. 102-4, above

Comment No. 415-4

I understand the construction will take 20 or more years. What are all of the different kinds of construction activity that will take place? And should we expect to be the different kinds of noise—jackhammering? blasting or explosions? What about the excavation/digging? Loading dump trucks and truck driving on site? I want to have a much clearer understanding of what all the sources and decibels of noise will be.

Response to Comment No. 415-4

This comment is identical to Comment No. 102-5. Refer to Response to Comment No. 102-5, above.

Comment No. 415-5

The signage is not described in enough detail. It seems billboards were mentioned but what about lighting of those and any other signs? Light pollution is a real thing. How will these lighting impact residents? How much energy will the signs use? What about any signage planned for on the property?

Response to Comment No. 415-5

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR. Also refer to Response to Comment Nos. 26-129 and 213-2 regarding off-site signs and billboards,

which would not be permitted under the proposed Sign District. Note that pursuant to SB 743 (Public Resources Code Section 21099), because the Project is an employment center project located on an infill site, the Project's aesthetic impacts (including impacts with respect to lighting) shall not be considered significant impacts on the environment and therefore do not require evaluation under CEQA. Nevertheless, the Initial Study included as Appendix A of the Draft EIR included an aesthetics analysis for informational purposes only.

Refer to Response to Comment No. 102-6 regarding the energy calculations, including energy for the proposed signage.

Comment No. 415-6

Another major concern is the portion of the BIR that states a goal for this Television City project is to make money for the developer. The city has no reason to state this. Why was that included? Is the city working for the developer or the people who live here?

Response to Comment No. 415-6

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 416

James Panozzo
LAUNCH LA
170 S. La Brea Ave.
Los Angeles, CA 90036-3090

Comment No. 416-1

I am the Director of LAUNCH LA, a neighborhood nonprofit arts organization close to Television City. I respectfully ask the City to approve the studio's plans to invest in more jobs and enhance and modernize its production facilities while at the same time working with its immediate neighbors to achieve these goals.

Television City has been in the Beverly/Fairfax District for generations, and the studio owners have been good neighbors.

I support the plan's overall goal of ensuring Television City remains a top level production hub attracting the best crews and talent in the entertainment industry while continuing to act as a good and cooperative neighbor. This plan will contribute to the long-term viability of the studio and area businesses, while preserving Television City's role in the neighborhood as a first-class production center.

Response to Comment No. 416-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 417

Jun Park
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 417-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 417-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 418

Rosa Park
537 N. Croft Ave.
West Hollywood, CA 90048

Comment No. 418-1

I would not have moved into this neighborhood a year ago if I had known about this project. None of the plans will benefit the existing community—what's really needed is housing, and NOT more than 1.4 million square feet of office space. Have you considered the vacancy rate of offices in the area? It seems to me that a lot of people will continue to work remotely. Instead, why can't a portion of this site be dedicated to housing?

The City of LA should be focused on making this our neighborhoods more healthy, more livable, and more walkable.

Response to Comment No. 418-1

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment Letter No. 419

Debra Pasquerette
325 N. Gardener St.
Los Angeles, CA 90036-5715

Comment No. 419-1

This project is not at all clear and it seems like the developer can essentially do whatever it likes once it gets the green light. For example, the Draft EIR continuously references a “specific plan” for the regulations that will dictate the project, but the draft specific plan isn’t included and obviously there could be hundreds of variations of the project—each having different impacts. We deserve to see the draft specific plan.

Response to Comment No. 419-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, 9-14, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the limited Land Use Exchange Program, and how the Project Description discloses all of the elements of the Project required by CEQA. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan, which were disclosed and analyzed in the EIR. As further discussed in Topical Response No. 1, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As also discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning’s website prior to the publication of this Final EIR.

Comment No. 419-2

And what are all of these Project Design Features? Are they a part of the project and if so, how will they be enforced? Seems that the EIR does not analyze the project’s impacts without project design features.

Response to Comment No. 419-2

Refer to Response to Comment No. 9-34 regarding the proposed PDFs.

Comment No. 419-3

The public can't understand the impacts if the analysis assumes project design features, whatever those are. The EIR needs to be recirculated to the community for further review and comment.

Response to Comment No. 419-3

Refer to Response to Comment No. 9-34 regarding the inclusion of PDFs in the Draft EIR.

The Draft EIR was prepared in accordance with the requirements of CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 420

Charles Paus
548 Spaulding Ave.
Los Angeles, CA 90036-1808

Comment No. 420-1

My wife and I have lived in this community for 25+ years and oppose every element of this plan—none of it will benefit the people who already live here. To the contrary: traffic and parking will be infinitely worse, construction is scheduled for the next 20 YEARS, emissions and pollution will be a constant, thousands of huge trucks will be rumbling through our streets, there will be a huge impact on our water resources, ceaseless noise, we will have ongoing security and safety concerns, historic and cultural sites like the Adobe, the Farmers Market and the Holocaust Museum will be affected...

Response to Comment No. 420-1

Regarding traffic, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding parking, under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project does not propose off-site parking.

Regarding the buildout timeline, refer to Response to Comment No. 9-24.

Air emissions during construction and operation, including those associated with truck trips, are fully analyzed in Section IV.A, Air Quality, of the Draft EIR.

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding truck trips during construction.

Impacts related to water resources are also analyzed in the Draft EIR. Refer to Section IV.G, Hydrology and Water Quality, of the Draft EIR for a discussion of water quality and Section IV.M.1, Utilities and Service Systems—Water Supply and

Infrastructure, of the Draft EIR for a discussion of water supply. As discussed in these respective sections, impacts would be less than significant.

Noise impacts during construction and operation are analyzed in Section IV.I, Noise, of the Draft EIR.

Impacts related to public safety are addressed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR.

Impacts to cultural resources, including historical resources, are analyzed in Section IV.B, Cultural Resources, of the Draft EIR. As discussed therein, impacts would be less than significant. Please note that the Holocaust Museum is not a historical resource as defined by CEQA. Refer to Response to Comment No. 41-4.

The remainder of this introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 420-2

Did we read the EIR correctly that one of the project objectives is to make money for the developer? Why is the City of Los Angeles saying that private sector profit is an objective for this project? What about the impacted community?

Response to Comment No. 420-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 421

Jennifer Peagler
351 N. Sierra Bonita Ave.
Los Angeles, CA 90036-2467

Comment No. 421-1

I write today in reference to the Television City redevelopment plan in our neighborhood.

Response to Comment No. 421-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 421-2

My number one concern is that it doesn't seem that we have considered strongly enough the negative impact that additional car traffic from the development coupled with the morning and afternoon school traffic from Fairfax High School will have on the adjacent neighborhoods. How have you studied the impact of the development on school traffic? Did your study look at traffic around 8:00am and 3:00pm when school traffic is at its peak?

Response to Comment No. 421-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR). Notwithstanding, the Transportation Assessment investigated the operational effects of Project trips on the streets and intersections near Fairfax High School and in the nearby neighborhoods. The Transportation Assessment included the evaluation of Project effects on three signalized intersections along Fairfax Avenue (at Melrose Avenue, Clinton Street, and Rosewood Avenue) immediately adjacent to Fairfax High School. These intersections were studied in the morning (7–9 A.M.) and afternoon (4–7 P.M.) as per LADOT TAG. In addition, the neighborhood streets around Fairfax High School were evaluated as part of the residential street cut-through traffic analysis found on pages 167–179 of the Transportation Assessment (Appendix M.1 in the Draft EIR). These streets would be included in the NTMP to be developed by the neighbors, Applicant, and LADOT for the neighborhood north of the Project Site, including the Fairfax High School campus area.

Refer also to Topical Response No. 9, Neighborhood Traffic Management Plan, for a description of the neighborhood traffic planning process and goals, including a discussion of the deterrence of cut-through traffic. Fairfax High School is located within the north neighborhood area that would be addressed as part of the NTMP, and, therefore, solutions to school traffic affecting the neighborhood would be considered as part of the NTMP.

Comment No. 421-3

Have you taken into account how the number of students at this high school might change over the next twenty years? How will you adequately study the traffic over the next twenty years (and possibly 20 years of construction!) if the number of students does drastically change?

Response to Comment No. 421-3

The Transportation Assessment (Appendix M.1 of the Draft EIR) projects traffic into the future using an annual growth factor to account for increases in traffic. This growth factor is intended to account for growth in school, residential, and commercial projects that might occur in addition to the 68 related projects studied in the analysis.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 421-4

We already experience issues with the student and parent traffic on our residential streets, and I believe that it will only get worse as they are forced to avoid main roads due to the construction taking place in and around Television City. Will you have guidelines for where students and parents should and should not park? How will you communicate these guidelines?

Response to Comment No. 421-4

The control of traffic around public schools is beyond the purview of the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. As described in the Response to Comment No. 421-2, the high school is part of the NTMP, and a school traffic management plan could be an outcome of the NTMP.

Comment No. 421-5

If all the traffic is pushed to residential streets, this is a massive safety issue for our pedestrians. How will you ensure more traffic does not flow onto our neighborhood

streets? What measures will be taken to ensure all residential streets have proper crosswalks, sidewalks, and signage for the pedestrians?

Response to Comment No. 421-5

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Comment No. 421-6

The bottom line is how are we going to ensure that traffic isn't redirected into the surrounding neighborhoods? And how will you protect the residents if it is? I appreciate your attention to this matter!

Response to Comment No. 421-6

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 421-2 through 421-5, above.

Comment Letter No. 422

Ruth Peebles
142 S. Kilkea Dr.
Los Angeles, CA 90048-3526

Comment No. 422-1

Thank you for the opportunity to express my strong opposition to this project—it is not at all clear what the finished project is supposed to look like, exactly where it's supposed to be located, how our neighborhood will be impacted, and when.

There could be literally hundreds of variations of the project—each having different impacts.

Response to Comment No. 422-1

This comment is similar to Comment No. 366-2. Refer to Response to Comment No. 366-2 regarding the Project Description and Specific Plan.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 422-2

What are the phases of how this project will be built? It's outrageous that we haven't been shown a phasing plan for this project—how can the community know what will be built, and when the phases will start and finish? And what kinds of disruptions to our lives are expected?

Response to Comment No. 422-2

Regarding Project phasing, refer to Response to Comment No. 9-24. The Project's construction schedule is included in Appendix B of the Draft EIR and is also provided in Table 1 of Appendix FEIR-8, Details of Project Buildout and Construction.

Section IV, Environmental Impact Analysis, of the Draft EIR includes a detailed analysis of Project impacts during both construction and operation.

Comment No. 422-3

The public deserves to see the draft specific plan and it should be included in a recirculated Draft Environmental Impact Report.

Response to Comment No. 422-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Refer also to Response to Comment No. 5-3. As discussed in Topical Response No. 1, the Draft EIR disclosed all of the elements of the Project required by CEQA and provides a comprehensive analysis of the Project, and the proposed Specific Plan is not necessary for evaluation of the Project.

Please note that the Preliminary Draft Specific Plan incorporates all of the same Project elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR. Future Project changes that are substantially different than the proposed Project or are beyond the scope of impacts evaluated in the EIR would require additional City review and approval, as well as CEQA compliance review. Refer to the Preliminary Draft Specific Plan, which is publicly available on the Department of City Planning's website.

With regard to recirculation, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 423

Tim Peng
timpeng@kw.com

Comment No. 423-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive

Response to Comment No. 423-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 424

Simone Perusse
101 N. Gardner St.
Los Angeles, CA 90036-2719

Comment No. 424-1

As a concerned resident who has lived in the neighborhood for 13 years. [sic]

Response to Comment No. 424-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 424-2

I am writing to you because I feel the Draft EIR is deficient as it did not include a copy of the proposed Specific Plan for the project.

The Draft EIR references the Specific Plan throughout the document. Initially, I thought the Specific Plan was included in the appendices of the Draft EIR. However, much to dismay, it was nowhere to be found. It is difficult to understand how the public can comment effectively on the land use section of the Draft EIR when the most important component of the project i.e., the land use regulations of the Specific Plan, was not included. Presenting fragmented references to a document that does not exist fails to provide the disclosure of information for the public's benefit. Can you explain if this was an oversight by the City and how it will be corrected?

Based on the fact that the Specific Plan was entirely omitted from the Draft EIR, an egregious error on the City's behalf, please recirculate the Draft EIR to include the Specific Plan. It would not be appropriate to include the Specific Plan in the Final EIR as the public would not have the opportunity to provide comments in a timely manner.

I appreciate your consideration of my comments.

Response to Comment No. 424-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description in the Draft EIR is

accurate, stable, and finite and contains all necessary data to evaluate and determine the potential environmental impacts of the Project.

As also discussed therein, all of the physical aspects of the Project that will be implemented by the proposed Specific Plan were fully disclosed and analyzed in the Draft EIR in accordance with CEQA, and although neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 425

Danielle Peters

Comment No. 425-1

The above-referenced Project will negatively and irrevocably change my neighborhood, and the DEIR does not adequately identify or address these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of their project required a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it.

Response to Comment No. 425-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 425-2**The Scope of This Project is Too Large for the Infrastructure of our Neighborhood**

The infrastructure of this neighborhood was sufficient to support the CBS of the past. It was NEVER intended to support the scope of what is being proposed by the Project applicants. While we treasure CBS Television City, the needs of the studio have changed over the last 50 years ago, and it and may have outgrown the neighborhood

First, the Los Angeles Police Department lacks the man power for the incredibly large area they must cover, and. response times are already marginal. Our neighborhood has seen a drastic increase in both the homeless population and residential crime (including the murder of Gabriel Donnay in 2021). This is serious, ongoing issue that already exceeds existing resources. Any increase in the amount of people in an area will inevitable bring about increase in crime. There are simply not enough resources available to keep our neighborhoods safe as it is.

Second, the frequency and duration of power outages in our neighborhood has also drastically increased over the past few years. This is further evidence of an infrastructure that is already over taxed and unable to support the MUCH greater load that the CBS redevelopment would generate.

Response to Comment No. 425-2

With regard to the scope and size of the Project, refer to Response to Comment Nos. 5-8 and 11-3. Infrastructure impacts were fully addressed and analyzed in Section IV.M, Utilities and Service Systems, of the Draft EIR and impacts were concluded to be less than significant.

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Response to Comment No. 16-5 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

With regard to power outages, as discussed on page IV.M.3-12 of Section IV.M.3, Utilities and Service Systems—Electric Power, Natural Gas, and Telecommunications Infrastructure, of the Draft EIR, LADWP confirmed in its will-serve letter (included in Exhibit 5 of the Utility Report [Appendix O of the Draft EIR]) that the Project's estimated electricity demand could be met by the existing electrical infrastructure in the Project area, and impacts would be less than significant. An updated will-serve letter was also issued by LADWP as part of this Final EIR and is included in Appendix FEIR-18.

Comment No. 425-3**A “Regional Center” Does Not Belong in Our Neighborhood**

Project Applicants claim that we “have always had a Regional Center in our backyards” and that they are just asking that the land use designation “catch up.” This is empirically false. A “Regional Center” is the same designation as Century City and Downtown Los Angeles. It is a place with tall buildings, commuters, traffic, people who come for their workday but don't have a vested interest in the community because they leave when the day is over.

This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, gridlock, soil destabilization as a result of dewatering, and air quality issues.

There is a process for changing the designation of an area, in our case the Wilshire Community Plan. The Project applicants are not going through that process. Consequently, our community members are being deprived of the opportunities to voice our concerns that such a process affords. Furthermore, this opens the door for future developers to request Regional Center designations in neighborhoods like ours, where such designations simply do not belong.

Response to Comment No. 425-3

Refer to Response to Comment Nos. 5-8, 11-29 and 16-4 regarding the proposed Regional Commercial designation.

The second paragraph of this comment is identical to a portion of Comment No. 100-6. Refer to Response to Comment No. 100-6 regarding the proposed development program.

Refer to Topical Response No. 6, Wilshire Community Plan Update, and Response to Comment No. 28-20 with regard to the Wilshire Community Plan update.

Comment No. 425-4**“Base Camps” Are Not Included In FAR Calculation**

Renderings of the Project on their own website shows what are called “Base Camps” that are under cover (i.e. [sic] there is a roof above them) and clearly being used for activities. However, these areas are not included in the FAR calculations. Most projects would include area that is under roof [sic] and being used in operations as part of FAR calculations. Therefore, assertions made to the public that there is only a modest increase in FAR seem misleading.

Response to Comment No. 425-4

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 with regard to the definition of floor area under the proposed Specific Plan, how the Draft EIR does not underestimate the size of the Project, how all of the proposed uses, areas and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area, and how no active production activities would be located in the parking and basecamp areas below Project Grade.

Comment No. 425-5**Traffic—Negatively Impacts (1) The Safety of Our Walkable Neighborhood and (2) Our Daily Commutes**

This Project will dramatically increase traffic, congestion, and gridlock and degrade the walkability and safety of the neighborhood. Our quiet streets—the streets we jog on, walk our dogs on, where our children play—will be filled with cars and cut through traffic impacting not only safety but also our regular commutes.

The Project applicants assert that their data shows that traffic will not be impacted, as the majority of employees would live in this neighborhood. This is ludicrous, and even they acknowledge that they do not yet know who will constitute their tenant base or who will be renting studio space. So, the actual number of commuters at any given time is not only an unknown, but a fluctuating unknown.

The DEIR “analysis” of cut through traffic is conveniently confined to a very small area directly around the Project. This not how cut through traffic operates. We already live with the consequences of traffic on Beverly Boulevard, Third Street, La Cienega and Wilshire during peak commuting hours. We are also keenly aware that drivers avoid that traffic in through OUR neighborhood streets. This is the reality.

Response to Comment No. 425-5

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Regarding walkability, refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

The City of Los Angeles has established criteria for determining if a proposed project would result in cut-through traffic effects. The analysis of cut-through traffic was not limited to just the neighborhoods north and west of the Project Site. Rather, the analysis looked at many neighborhoods around the Project, and the residential neighborhoods immediately north and west of the Project Site were the only ones that met the City’s criteria. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

The Draft EIR does not state or suggest that the majority of the Project employees would live in the neighborhood. The VMT analysis demonstrates that the location of the Project would result in a work VMT per employee that fell below the target threshold for work trip travel in this area of Los Angeles. This indicates that the jobs are well placed in relationship to the distribution of residential uses served by the employment center. Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project’s VMT analysis, including as related to employee trip lengths.

The remainder of this comment discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 425-6

Lack of Affordable Housing—Rents Will Increase

The Project will employ approximately 8,000 workers, putting enormous pressure on area rents. For many of those that are employed by the studios, living here is simply not affordable, and thousands more commuters will be coming into and out of our neighborhood daily. For our community, this means that landlords will be able to charge a new tenant a great deal more than they are charging us. For our current renters, that is not a good place to be. For our future renters, the cost of renting will be significantly higher.

Response to Comment No. 425-6

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, the provision of housing, and the consideration of economic and social effects under CEQA.

Vehicle trips anticipated to be generated by the Project and the associated impacts on the transportation system are addressed in Section IV.K, Transportation, of the Draft EIR. As discussed in Section IV.K of the Draft EIR, Project impacts related to transportation would be less than significant and no mitigation measures would be required.

Comment No. 425-7

Water Table—Soil Instability in a Seismically Active Area

From Beverly Boulevard to the Farmer's Market property line, the Project proposes 800,000 yards of excavation for underground facilities. Water will be depleted from surrounding areas causing soil instability. In an area that is seismically active, there must be further analysis done on the impact of a seismic event, at various intensities on surrounding areas whose water tables have been depleted. Much more needs to be understood about the impact on natural resources and soil stability in an area with a high water table and potentially serious seismic risks.

Response to Comment No. 425-7

Refer to Response to Comment No. 26-69 with respect to dewatering as it relates to subsidence and other seismic risks. Refer to Response to Comment No. 26-E.3-7 regarding seismic-related impacts.

Comment No. 425-8**Conclusion**

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, they offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

Response to Comment No. 425-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 425-2 through 425-7.

Comment Letter No. 426

Danielle Peters

Comment No. 426-1

The DEIR Air Quality Analysis for the above referenced Project (the “Proposed Project”) is fraught with error and puts the health of sensitive receptors at risk. Specifically in this communication I am focusing on the Hancock Park Elementary School (“HPES”). I have been a resident of this area my whole life, I am an alumnus of HPES and am now the President of the booster club and parents to two young children who attend HPES. The DEIR for the Proposed Project fails to keep my children and our community safe. The DEIR fails to (1) analyze the cumulative air quality effects concurrent overlapping construction (2) substantiate claims about atmospheric dispersion, (3) account for the proximity of the haul route to HPES (a sensitive receptor) in its calculations and does not accurately report trips along that route and (4) require preparation of a Health Risk Assessment. As such, HPES students, especially as a sensitive population, are at significant risk and that risk is undisclosed to the general public.

Response to Comment No. 426-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comments Nos. 426-2 through 426-5 for specific responses to the issues raised in this comment letter.

Comment No. 426-2**I. The DEIR Does Not Sufficiently Analyze the Cumulative Effects of Emissions/ Pollutants as it Relates to HPES**

The Town and Country Project (“TC Project”), which is identified as a related project (DEIR page III-6) is projected to have a construction period of approximately three (3) years with construction projected to begin in late November, 2022.

An environmental impact report (EIR) must identify and focus on the significant environmental effects of the proposed project (Cal. Code Regs., tit. 14, § 15126.2, subd. (a)). A significant environmental effect is a substantial, or potentially substantial, adverse change in the environment (Pub. Resources Code, § 21068; Cal. Code Regs. tit. 14, § 15382). “Environment” means the physical conditions that exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance (Pub. Resources Code, §

21060.5; Cal. Code Regs., tit. 14, § 15360). Even if a project's impact may be individually limited, this impact may be cumulatively considerable, and an EIR must discuss these impacts (Pub. Resources Code, § 21083, subd. (b)(2); Cal. Code Regs., tit. 14, §§ 15065, subd. (a)(3), 15130, subd. (a)). **“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects** (Pub. Resources Code, § 21083, subd. (b)(2); Cal. Code Regs., tit. 14, § 15065, subd. (a)(3)). [Emphasis added]

San Franciscans for Livable Neighborhoods v. City and County of San Francisco (2018) 26 Cal. App. 5th 596, 622

The DEIR must account for the cumulative effects of pollutants caused by the Project *in addition* to any simultaneous and concurrent demolition and/or construction of the T & C Project. HPES has had the opportunity to thoroughly analyze the TC Project and did not oppose the EIR for that project or any information therein however the same cannot be said [sic] the Proposed Project.

The DEIR does not adequately evaluate emissions to show estimates that would include emissions from T & C Project. As argued below, the numbers that the DEIR is basing its analysis on are already based on underestimations and therefore already flawed. This in conjunction with the fact the DEIR fails to analyze the cumulative effects of proposed levels of emissions/pollutants resulting from the Project in addition to the increased pollutants that will exist during the concurrent construction of the T & C Project at various stages of construction, results in a gross miscalculation of the health risks to HPES. This is particularly concerning with respect to the emissions resulting from the haul route discussed below.

Response to Comment No. 426-2

Contrary to the commenter's assertion, the Town & Country project was accounted for in the cumulative impact analyses throughout the Draft EIR. As shown in Table III-2, Related Projects, on page III-9 of Section III, Environmental Setting, of the Draft EIR, the Town & Country project is included as Related Project No. 13. The cumulative methodology for air quality impacts recommended in this comment would not be consistent with SCAQMD guidance for the evaluation of cumulative impacts. Based on SCAQMD guidance, as discussed on page IV.A-77 of the Draft EIR, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the

Air Basin is in non-attainment.¹⁶⁰ Refer to the cumulative air quality analysis on pages IV.A-77 through IV.A-79 in Section IV.A, Air Quality, of the Draft EIR.

Comment No. 426-3

II. DEIR Relies on Unsupported Claims About Atmospheric Dispersion

Hancock Park Elementary School (“HPES”) is located approximately 1,500 feet south of the Project Site. (DEIR, IV.A.-29). This school is one of many sensitive receptors identified within the Project area (DEIR IV.A 30–31). Children and those with cardio-respiratory diseases are considered more sensitive to air pollution. (DEIR. [sic] IV.A-31; Appendix A, page 46).

The DEIR uses Southern California Air Quality Management District (SQACMD) Localized Significant Threshold which provides mass rate look-up tables with Localized Significance Thresholds (“LST’s” [sic] which are based on the distance between sensitive receptors and Project Site boundaries. (DEIR IV.A-31). According to these tables, the shortest receptor distance is 25 meters (82 feet). (DEIR IV.A-31). SQACMD recommends that LSTs are used for receptors within 25 meters of the Project. Therefore, DEIR assumed LST receptor distance to be 25 meters. “All other existing air quality-sensitive used are located at greater distances from the Project Site” and thus “*would experience lower air quality impacts from potential sources of emissions at the Project Site due to atmospheric dispersion effects.*” [Emphasis Added] (Page IV.A-31). **These claims are not supported by modeling of atmospheric dispersion let alone modeled accounting for simultaneous and concurrent construction that will also affect HPES.** The DEIR must include modeling for atmospheric dispersion and in that modeling must account for emissions from concurrent construction.

Response to Comment No. 426-3

Refer to Response to Comment No. 26-28 for a discussion of why atmospheric dispersion is not necessary to evaluate the localized impacts of Project emission sources. Refer to Response to Comment No. 26-E.1-21 for a discussion of the analysis of localized air quality impacts, the LST methodology and the 25-meter criterion.

As discussed on pages IV.A-77 to IV.A-80 and shown in Table IV.A-13 in Section IV.A, Air Quality, of the Draft EIR, the cumulative localized air quality impacts would be less than significant with mitigation.

¹⁶⁰ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.

Comment No. 426-4**III. [sic] The DEIR Does Not Account for Proximity of Haul Route to HPES and Underestimates Haul Trips Along That Route**

Using SQACMD's Localized Significant Threshold for CEQA Evaluations which provides mass rate look up tables with Localized Significant Thresholds (LSTs), the DEIR determines that because the Project Site is greater than 25 meters from HPES it is at a great enough distance to experience lower air quality impacts. (DEIR page IV.A-31). This claim—that sensitive receptors such as HPES would experience lower air quality impacts due to atmospheric dispersion—does not account for the proximity of the Proposed Project's haul route.

The scheduled truck route for excavation and fill takes all vehicles directly past the HPES campus—well within the 25-meters set forth above. (DEIR IV.A 60–62, DEIR Appendix A page 38). “The haul route for these trips would include traveling Southbound on South Fairfax to San Vicente...” (DEIR, Appendix N, page 38). Stated differently, all construction and demolition debris, will make its way past HPES. This included 60,000 cubic yards of hazardous soil material. (DEIR Appendix B-3) the “excavation and export of approximately 86,500 cy of soil” is “estimated to generate approximately 12,358 haul truck trips... over an approximate three-month period.” (DEIR, Appendix A page 38). In fact, the portion of HPES that is located closest to this traffic is playground for the Transitional Kindergarten and Kindergarten children—the youngest group of students at HPES. Additionally, the route passes a large portion of the main building with classrooms whose windows open onto Fairfax Avenue.

Having said that, the DEIR underestimates the number of hauling trips evaluated in the air dispersion calculations and therefore grossly underestimates the air quality impacts. The DEIR appears to only calculate hazardous waste hauls but does not include approximately 95,000 haul trips in the emission analysis. Should this number be corrected, it would nearly double the VMT. Should this number be corrected AND include data from concurrent simultaneous construction, it would be clear how at risk these children are. The DEIR's failure to accurately account for trips renders the Air Quality analysis, atmospheric dispersion analysis (or lack thereof) and the related documents upon which these analyses are based ineffective, misleading putting and dangerous to human lives.

Response to Comment No. 426-4

Refer to Response to Comment No. 26-E.1-21 for a discussion of the localized air quality impact analysis and the Project's use of the 25-meter LST lookup tables. Please refer to Response to Comment No. 26-30 for a discussion of the Project's CalEEMod model accounting for all Project-related hauling, including a total of approximately 126,972 truck trips related to grading import/export (111,000 trips for import/export, 7,400 trips that

could be used for deliveries or import/export, and 8,572 trips related to export from contaminated soils). As discussed therein, potential impacts were evaluated at the closest off-site sensitive receptor, which is the residential use located directly east of the Project Site boundary. The localized impact analysis included both off-road (e.g., bulldozers, loaders, and excavators) and on-site on-road vehicles (e.g., haul and delivery truck travel and idle time). As shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with the incorporation of mitigation measures. Construction-related trucks along haul routes near the Project Site would represent a small fraction of the total emission evaluated in the air quality analysis as a truck would only be located next to a single residence or sensitive receptor, such as Hancock Park Elementary School, for a very short duration (traveling around 25 mph). As discussed above, the total on-site emissions would result in a less-than-significant localized air quality impact at the closest sensitive receptor. Therefore, no additional analysis of trucks along haul routes is required under CEQA.

The claim that the Draft EIR underestimates the number of hauling trips is incorrect. As shown above, the Project includes approximately 126,972 truck trips and is substantially more than the CalEEMod default of 102,750 truck trips. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Appendix B of the Draft EIR regarding the number of construction trucks.

Comment No. 426-5

IV. The DEIR Fails to Prepare a Health Risk Assessment

Despite the Proposed Project being close to a number of sensitive receptors, including HPES, the DEIR fails to prepare a Health Risk Assessment (“HRA”). As previously stated, the Proposed Project subjects HPES, a sensitive receptor, to diesel particulate matter—known carcinogens and other toxic air contaminants that could have a serious health risk impact. Due to the proximity of (1) HPES to the Proposed Project, (2) the proximity of HPES to the truck haul route, (3) the 772,000 cubic yards of cut and 50,000 cubic yards of fill going to and from the Project site, (4) the number of trucks trips (which is highly underestimated) and the emission resulting thereof, (5) concurrent construction emissions and (6) the release of harmful pollutants resulting from moving soil and hauling that contaminated soil past HPES, there is a very serious risk that must be communicated to HPES families.

The California Supreme Court in *Sierra Club v. County of Fresno* (Dec. 24, 2018) 6 Cal.5th 502 held that portions of the air quality analysis in Fresno County’s BIR for the 942-acre Friant Ranch Specific Plan violated CEQA. In reaching this decision, the Court made four important holdings which include, but are not limited to: (1) for an EIR’s discussion of environmental effects “is sufficient to satisfy CEQA, an EIR must include sufficient detail to

enable those who did not participate in its preparation to understand the issues raised by the proposed project and (2) an BIR must show a “reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.

Response to Comment No. 426-5

The air quality analysis in Section IV.A, Air Quality, of the Draft EIR analyzed impacts to Hancock Park Elementary School as a sensitive receptor. As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased truck trips associated with construction and operations, would be below SCAQMD’s risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less than-significant impact.

Refer to Response to Comment No. 26-E.1-21 for a discussion of the analysis of localized air quality impacts, the LST methodology and the 25-meter criterion. Refer to Response to Comment No. 426-4 regarding the analysis of haul trucks. Refer to Response to Comment No. 426-4 regarding the number of haul truck trips. Refer to Response to Comment No. 426-3 regarding cumulative localized impacts. The Draft EIR’s air quality analysis accounted for dust emissions that would result from soil-handing activities. Refer to Response to Comment No. 11-26 regarding the Friant Ranch decision and the Draft EIR’s air quality analysis.

Comment No. 426-6

V. Conclusion

The DEIR Air Quality analysis is erroneously analyzed and, among other shortcomings, is based on unfounded statements about atmospheric dispersion, an underestimated number of hauling trips, a lack of analysis on overlapping concurrent construction and resulting operational emissions and without an HRA. Based on flawed calculations, or a complete lack of analysis on others and without an HRA it is impossible for HPES families to know and understand that potential risks associated with the Proposed Project and therefore robs them of the ability to mitigate those impacts for their families.

I respectfully request that the DEIR be recirculated upon the following corrections being made: (1) the DEIR must include detailed modeling of atmospheric emissions including emissions from concurrent and overlapping construction , (2) the DEIR Air Quality analysis be corrected to reflect an accurate number of hauls & truck trips, (3) appropriate mitigations

be adopted accordingly and (4) that a detailed HRA be prepared to calculate and disclose the risk of cancer and other health risks to HPES and other sensitive receptors.

Response to Comment No. 426-6

Refer to Response to Comment Nos. 426-2 through 426-5. As demonstrated therein, the Draft EIR meets the requirements of CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 427

Edward Petlak
174 S. Detroit St.
Los Angeles, CA 90036-2914

Comment No. 427-1

I'll be frank; I don't understand the traffic analysis provided with the draft EIR for the TVC 2050 project. The traffic plan provided as part of the draft EIR doesn't give any indication how traffic will be re-routed. It also doesn't take into account special events when traffic counts are heaviest or trash collection days. How will first responders navigate the neighborhood when its gridlocked?

Will the developers provide additional detail to back up their claims?

Response to Comment No. 427-1

This comment is identical to Comment No. 78-1. Please see Response to Comment No. 78-1, above.

Comment No. 427-2

The plans for parking during construction don't seem credible to me. Tens of thousands of construction vehicles will be entering the site off of Fairfax. Do we have any idea where these trucks will be staging and idling? What kind of impact will the truck traffic have on noise and air quality? Have the developers communicated at all with any of the schools, residences, and nursing homes along Fairfax regarding the possible disruption to their lives? What have they been told about impacts that will affect them?

Response to Comment No. 427-2

This comment is identical to Comment No. 78-2. Please refer to Response to Comment No. 78-2, above.

Comment No. 427-3

According to the draft EIR, almost 8,000 employees will be on site once the production facilities become operational. Up to 5,000 people per day will access the site as television audience members. Yet the draft EIR calls for 5,300 parking spaces on site. Where will everyone else park? How did they arrive at these numbers. Will people accessing the TVC site be allowed to park in adjacent neighborhoods? Will audiences be accessing the facilities during the evening hours? We haven't been provided answers to these questions.

Response to Comment No. 427-3

This comment is identical to Comment No. 78-3. Please refer to Response to Comment No. 78-3, above.

Comment No. 427-4

I hope you'll demand answers from the developers to my questions. I also hope you'll demand the developers do a better job of communicating with neighborhood residents and business owners. The more I learn about TVC 2050, the more concerned I become. Please don't let this project move forward until our questions are answered.

Response to Comment No. 427-4

This comment is identical to Comment No. 78-4. Refer to Response to Comment No. 78-4, above.

Comment Letter No. 428

Michael Petruncola
603 N. Laurel Ave.
Los Angeles, CA 90048-2320

Comment No. 428-1

I'm writing on behalf the TVC 2050 application. The Draft EIR has zero details, and there needs to be an in-depth review of impacts to streets. The location of the planned project sits in one of the busiest intersections in one of the busiest areas of Los Angeles.

Response to Comment No. 428-1

This comment is identical to Comment No. 305-1. Refer to Response to Comment No. 305-1, above

Comment No. 428-2

How will the project—at the corner of what I understand have been deemed **two** high injury network streets, Beverly Blvd and Fairfax—impact safety? The draft EIR gives no specifics about what it means for a street to be in the high injury network, but it's no surprise that they are. So what determines a high injury street? What are the high injury statistics for those two streets? What are the findings on what the increase in high injury accidents will be when this project is being built? And when it is done? What is the project planner required to do as a result of his project being at the corner of two high injury network streets? I would expect different measure would have be taken, right? since going into the project, we all know those streets will be hugely affected.

Response to Comment No. 428-1

This comment is identical to a portion of Comment No. 305-2. Please see Response to Comment No. 305-2, above.

Comment Letter No. 429

Roderick Pinkney
4859 W. Slauson Ave., #137
Los Angeles, CA 90056-1290

Comment No. 429-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 429-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 430

Devora Pinson
243 S. Formosa Ave.
Los Angeles, CA 90036-2813

Comment No. 430-1

The Television City project's plans will be extremely damaging to the community's economy and environment.

Response to Comment No. 430-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 430-2 through 430-5.

Comment No. 430-2

I am concerned about the project's response and acknowledgement of global trends. Since the beginning of the Coronavirus pandemic, more employers are providing remote work flexibility as well as downsizing their office space. The project includes plans that are outdated and an ineffective use of resources. With thousands of new employees expected, why isn't remote work considered in the plan? What are the projected trends of remote vs in person work trends for the entertainment industry? Many people were surprised to see the decreasing popularity of movie theaters in the United States in the past twenty years. An industry that was once flourishing and deeply ingrained in American culture now struggles to stay afloat. What research has been done about concerts and their popularity? Are the developers concerned about the long-term vitality of the concert venue?

Response to Comment No. 430-2

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Note that the Project does not propose a concert venue on the Project Site; refer to Topical Response No. 3, Permitted On-Site Uses. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 430-3

With the expansion and creation of many buildings, what about plans for landscaping? What is the design vision for the streets of Beverly Fairfax? Will funds be reserved toward planting trees and grass, or adding parks in the community?

Response to Comment No. 430-3

Refer to pages II-23 through II-25 in Section II, Project Description, of the Draft EIR for a discussion regarding landscaping improvements associated with the Project. Refer to Response to Comment No. 16-47 for additional information regarding the Project's landscape improvements. The Project is not proposing a park for public use. Refer to Response to Comment Nos. 16-72, 28-18, and 172-3 regarding the proposed public realm enhancements and pedestrian-oriented design.

Comment No. 430-4

The plan is to make our community a regional center, so I do not know if that vision will include developments to the area. What exactly does that mean anyway, to be a regional center? What if the community does not want that?

Response to Comment No. 430-4

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Following the publication of this Final EIR, the Project approvals, including the proposed General Plan Amendment, among others, and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Comment No. 430-5

Automotive companies have been racing to offer electric cars, and more consumers are making the switch. California is requiring sales of only electric vehicles. Yet, the draft EIR does not include information about electric charging availability. What will the breakdown of parking spots with electric charging stations to those without charging stations be? With incredible developments in environmentally friendly cars in the past five year, the plans for the parking structure must consider the needs residents and workers will have in 2045.

Response to Comment No. 430-5

As stated on page IV.E-51 of the Draft EIR, the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces must include EV charging equipment, and a total of 30 percent of all new parking spaces would be required to be EV "ready," which must be capable of supporting future EV charging equipment. In addition, a PDF is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, to require the installation of electrical hookups at all basecamp areas. In addition, four EV chargers would be provided at the Mobility Hub for future electrical shuttles. Refer to Response to Comment No. 26-52 regarding electricity associated with EV charging and Response to Comment No. 26-E.1-38 regarding ZE and NZE infrastructure support.

Comment No. 430-6

Thank you for considering my concerns about the project. I want the best for Beverly Fairfax and will be awaiting your responses to my questions.

Response to Comment No. 430-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 430-2 through 430-5.

Comment Letter No. 431

Yossi Pinson
243 S. Formosa Ave.
Los Angeles, CA 90036-2813

Comment No. 431-1

I would like to comment on several aspects of the Proposed TVC 2050 Project.

Response to Comment No. 431-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 431-2 through 431-4.

Comment No. 431-2

The project proposed to have production facilities in the basement of the parking garage. Does that mean no cars will be able to get through these areas? What is the plan for circulation then? Why is production space being allotted in that location? So which access points or gates will cars and trucks be using? Only on Beverly and the Grove Drive? Please explain because the plan is not understandable. Can you show analysis of what will happen if cars and trucks cannot park except through Beverly and Grove gates?

Response to Comment No. 431-2

Refer to Response to Comment No. 16-11 regarding the Project's multi-level circulation plan, which is discussed on pages IV.K-42 to IV.K-44 in Section IV.K, Transportation, of the Draft EIR. Please note that no active production activities or uses would occur in the parking and basecamp areas below Project Grade. Refer to Figure II-6(a) in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Much of the truck activity would occur in the lower (subterranean) level of the Project Site although there would still be underground parking covering much of the Project Site. The lower-level truck areas would be used for basecamps to support the sound stages and for deliveries.

The primary entry points for both trucks and cars would be through the three signalized entrances on Fairfax Avenue, Beverly Boulevard, and The Grove Drive. Cars

entering through any of the three signalized entrances would be able to travel within the Project Site to any of the parking areas.

If all access to/from the Project Site were limited to the Beverly Boulevard and The Grove Drive gates, they would both operate at a lower level of service than shown in the Transportation Assessment and congestion on both Beverly Boulevard and The Grove Drive would increase.

Comment No. 431-3

It also appears that almost all of the parking is located on the Grove drive, so wouldn't most people trying to get to the site use that entrance? What happens if all of the traffic to the site tries to use that Grove gate? Was other analysis done of the various levels of usage at each gate? Where is that analysis available? Several of us in the community do not understand the plan for entering and exiting parking, the access points if not on Grove, and what happens when traffic gets backed up trying to enter a parking garage. Please explain in detail.

Response to Comment No. 431-3

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Topical Response No. 12, Safety and Congestion, regarding access and use of The Grove Drive. The Grove Drive was selected as one of three signalized access driveways for the Project because The Grove Drive has more available capacity than either Fairfax Avenue or Beverly Boulevard.

Figure 22 on page 80 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the assignment of trips in and out of each Project driveway and Table 18 on page 162 shows the performance of each of the signalized driveways, indicating that all three driveways operate at LOS B upon full buildout of the Project. Refer to Section A, Queuing at Project Driveways, of Topical Response No. 12, Safety and Congestion.

The remainder of this comment discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 431-4

I am also very concerned about putting a truck road and studio buildings so close to apartments. This will create a health risk for residents. What are the health impacts on

residents from fumes coming from these trucks and studios? What about when those trucks are idling? Trucks and studios are also very loud. What will the noise impact be on the adjacent residential apartments? There is also a school across the street. Please analysis the noise and health impacts on the apartment residences and the school.

Thank you.

Response to Comment No. 431-4

This comment is similar to the first paragraph of Comment No. 231-3. Refer to Response to Comment No. 231-3 regarding health impacts. Also refer to Response to Comment No. 126-2 regarding truck idling.

The Draft EIR also includes an analysis of Project impacts with respect to noise. As discussed on pages IV.I-54 through IV.I-56 Section IV.I, Noise, of the Draft EIR, Project operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the City's General Plan or Noise Ordinance, or applicable standards of other agencies, resulting from all on-site sources, as well as roadway vehicle noise from the Project. Therefore, the Draft EIR concluded that the Project's impacts with respect to noise during operation would be less than significant.

Comment Letter No. 432

Todd Powers
569 N. Rossmore Ave.
Los Angeles, CA 90004-2452

Comment No. 432-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 432-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 433

David Purdie
451 N. Sierra Bonita Ave.
Los Angeles, CA 90036-2471

Comment No. 433-1

As a member of the Fairfax community, I feel threatened by the proposed project. How could such an egregious plan be put forward? There are many concerning aspects, and I will highlight a few of my main concerns below.

Response to Comment No. 433-1

This introductory comment is identical to Comment No. 382-1 but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 433-2

As it stands, there is a large parking structure being placed on Grove Drive. Grove Drive is right across from Pan Pacific Park. Children, senior citizens, and everyone in between frequent this park. With this new parking structure, there are going to be many more trucks entering Grove Drive and emitting fumes and exhaust next to the park. How many trucks are expected to be in this parking structure? How much diesel exhaust is going to be emitted? What are the health risks to people? Are the health risks different for younger children than for senior citizens? Please provide a proper analysis on the health risks associated with all exhaust.

Response to Comment No. 433-2

This comment is identical to Comment No. 382-2. Refer to Response to Comment No. 382-2, above.

Comment No. 433-3

Staying on the theme of Grove Drive, essentially all of the parking is located on the road. This means that all the people trying to get to the project site will use Grove Drive. This seems impossible and is bound to be chaotic. How is the Grove gate going to handle this congestion? What will happen if 25% of traffic uses the Grove gate? What about 50%? 75%? And on the most extreme end, what would happen if 100% of the traffic tries to use the Grove gate?

Response to Comment No. 433-3

This comment is identical to Comment No. 382-3. Refer to Response to Comment No. 382-3, above.

Comment No. 433-4

Another thing that concerns me is parking plan. In its current state, it makes no sense. The Draft EIR outlines that there will be roughly 8,000 people employees on site. Additionally, the large audience stages could bring in 3,000 to 5,000 people a day to the site. However, the project is allotting 5,300 parking spaces. What is the plan for employee parking? How are parking permits going to be distributed? How are they going to be monitored and enforced? With these numbers, there are not enough spaces. Where is the overflow going to park? Are you going to have designated spaces for them nearby or are they expected to park all around our community?

Response to Comment No. 433-4

This comment is identical to Comment No. 382-4. Refer to Response to Comment No. 382-4, above.

Comment No. 433-5

All of the points above need to be addressed. They all directly impact the health and lifestyle of residents like me, and it is important for these questions to be answered and changes to be made. The plan as it stands is unacceptable and needs to be heavily reconsidered.

Response to Comment No. 433-5

This comment is identical to Comment No. 382-5. Refer to Response to Comment No. 382-5, above.

Comment Letter No. 434

Adam Raeburn
451 N. Poinsettia Pl.
Los Angeles, CA 90036-2504

Comment No. 434-1

I am writing to raise questions that need to be answered about the proposed Television City plan.

Response to Comment No. 434-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 434-2 through 434-3.

Comment No. 434-2

It appears from the Draft EIR that only a qualitative description of a long-range project buildout was provided. The analyses all seem to be based on a three-year construction timeline even though the applicant is asking for a 20-year Development Agreement, meaning that construction could actually go on for 20 years.

Given that a long-term buildout scenario is definitely possible, why isn't the city requiring a full analysis of that potential, with complete data and information that would allow member of the public and concerned parties to learn about and understand the full range of potential impacts? How would the city be able to approve a project with significant long-range impacts that have not been quantified and examined? And why would the city want to take such an irresponsible action?

Response to Comment No. 434-2

Regarding the Project timeline, refer to Response to Comment No. 9-24. As discussed therein, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts associated with a 20-year buildout is included for each of the environmental topics studied in the Draft EIR. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment No. 434-3

In an area that is so traffic-intensive for many miles in every direction, why was only a .5 mile radius used to analyze cumulative impacts that would result from other projects? And why was it assumed that all related projects would be completed by 2026 for the purpose of doing the traffic analysis? Why were the only projects included in the traffic assessment those within .5 miles?

Even the EIR's projected growth estimates used a .5 radius as a basis for the analysis, even though there is awful traffic on all the streets leading to and away from the project site. Why was that radius used? Wouldn't it make more sense to actually capture the distance from the project site that will be effected? The city needs to make sure these analyses are redone to take into account the on-the-ground reality of the broad reach of the impacts this project will have.

Response to Comment No. 434-3

Under SB 743, the transportation impacts of a project are measured in terms of VMT instead of the previous criteria based on traffic capacity and congestion. The VMT analysis uses the City's regional travel demand forecast model to track work trips from their homes (wherever they may be in the entire region) to the place of employment. The City's travel demand model is based on long-range projections 20 years into the future and covers not just a 0.5-mile radius from the site but covers the entire region. The City of Los Angeles also requires a non-CEQA operational impact that measures the Project's potential impacts on key intersections near the Project. For this reason, the Transportation Assessment (Appendix M.1 of the Draft EIR) selected 31 intersections near the Project Site and measured the LOS effects of Project trips on these locations. Beyond the radius selected for the Study Area, the incremental impact of Project trips quickly dissipates.

Future traffic levels in the Study Area were a combination of existing (pre-pandemic) traffic levels, an ambient growth rate applied to all existing traffic, and traffic expected from 68 related projects that may send all or a portion of their traffic through the study intersections.

While the comment suggests that only related projects within a 0.5-mile radius of the Project Site were investigated, a review of Figure 14 on page 47 and Table 5 on pages 60–65 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows that the actual boundaries of the related project search area was Sunset Boulevard on the north, Pico Boulevard on the south, the Santa Monica Boulevard/Wilshire Boulevard intersection on the west, and La Brea Avenue on the east. This represents a related project study area of approximately four miles wide by three miles high. This is clearly much larger than the 0.5-mile radius cited in the comment. The 68 related projects were all conservatively assumed

to be approved, constructed, and fully occupied by 2026, which is highly unlikely to occur. Nevertheless, all these related projects were assumed to be generating traffic onto the street systems by the time that the Project is completed.

The growth estimates used in the Transportation Assessment were based on an annual growth rate increase of 1 percent per year. This growth rate was applied to all the existing traffic using the streets in the area today, regardless of where the trips originated.

The combination of 68 related projects and the 1-percent annual growth rate resulted in future base 2026 traffic levels approximately 12.8 percent higher than are on the streets today. This is a higher growth rate than the SCAG regional travel demand model predicts for area streets in the Year 2040.

Comment Letter No. 435

Ali Rahimi
464 S. Mansfield Ave.
Los Angeles, CA 90036-3516

Comment No. 435-1

As I read the draft EIR for the TVC 2050 project, the people who are building this monstrosity are trying to convince us traffic will not be all that bad if the project is approved. Who are they kidding?

Response to Comment No. 435-1

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 435-2

They claim that large numbers of people will start using mass transit in the Beverly-Fairfax area, both tourists and residents alike, rather than deal with the traffic headaches caused by decades of high-rise construction and the arrival and departure of production trailers. I have no idea how they arrived at their numbers for transit users, but I can guess they have very little understanding of Angelenos and their love of cars. Can you please explain how it was determined that a large number of people will start using mass transit? Do you know the average number of people that are expected to switch to mass transit? How were these numbers determined? How will these numbers be adjusted when studies are done of the actual transportation used of people working and visiting there? How will the impacts that are being stated as not significant be re-analyzed for actual transit use, not some projections? If the project is approved based on these kinds of assumptions, then how can we go back once it's shown that the transit use numbers are just not happening? What happens then?

Response to Comment No. 435-2

This comment is identical to Comment No. 90-2. Refer to Response to Comment No. 90-2, above.

Comment No. 435-3

All of these construction trucks and production trucks and the re-routed commuter traffic is going to be in very close proximity to residential properties and apartments. I fear an increase in traffic accidents, injuries and worse. Where are the estimates of the increase in accidents, injuries and deaths resulting from all of the additional cars and trucks? You know that Beverly and Fairfax are two of the highest injury streets, right? How can this huge development be considered in that situation, for that location? How do you plan to mitigate traffic accidents or injuries? Who will be responsible for these accidents?

Response to Comment No. 435-3

This comment is identical to Comment No. 90-3. Please see Response to Comment No. 90-3, above.

Comment No. 435-4

Please pump the brakes on TVC 2050 and ask the developer to provide a lot more detail to their plans. Neighborhood residents deserve details.

Response to Comment No. 435-4

This comment is identical to Comment No. 90-4. Refer to Response to Comment No. 90-4, above.

Comment Letter No. 436

Danielle Railla
341 N. Stanley Ave.
Los Angeles, CA 90036-2398

Comment No. 436-1

The community is aware of the information sent out in the EIR regarding the upcoming project. However, the EIR appears to generate several concerns.

Response to Comment No. 436-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 436-2 through 436-5.

Comment No. 436-2

With tens of thousands of trucks having to come up Fairfax to get to the project site, the Draft EIR should analyze the air quality, noise and other issues impacting all the sensitive uses along Fairfax. What specific plans are in place to illuminate noise from the construction? There are many schools, nursing homes and residential uses that will be impacted. Have these people been notified of the incredible impact's tens of thousands of trucks will have on their lives?

Response to Comment No. 436-2

The first sentence of this comment is similar to a portion of Comment No. 49-2. Refer to Response to Comment No. 49-2 regarding trucks on Fairfax.

Refer to Response to Comment Nos. 26-E.1-2 and 26-E.1-16 regarding sensitive receptors. Refer to Response to Comment Nos. 26-E.1-2 and 26-E.1-16. Refer to pages IV.I-35 through IV.I-59 of Section IV.I, Noise, of the Draft EIR for a detailed discussion of construction-related noise impacts associated with on-site construction activities and haul trucks.

Comment No. 436-3

The project may have thousands of audience people a day. What happens when they park in the community, is there a strategy outlined for community parking? With the number of people in the area increasing, people in the neighborhood would need to be more cautious.

What are the risks of a security standpoint for the community? Speeding in the area could raise a big problem for school children, the elderly, and for Jewish people walking to services. Is there a plan to control motor vehicular accidents during the time of construction?

Response to Comment No. 436-3

The first two sentences of this comment are similar to Comment No. 396-2. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Please note that the comment regarding the number of audience members is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 12, Safety and Congestion. Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Pursuant to Project Design Feature TR-PDF-1, the Project is required to prepare a CTMP for City approval that would address potential construction safety issues.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

This comment refers to generalized “risks” without specifying a concern and, as such, has been noted for the administrative record.

Refer to Response to Comment No. 405-4 regarding speeding.

Comment No. 436-4

The EIR outlines some aspects of the physical work to be done. However, the environment will be impacted as well. What will be done about the air quality for those affected by the construction? All of the added idling, exhaust and emissions will definitely affect those who live and work here. What will those adverse impacts be?

Response to Comment No. 436-4

As stated on pages IV.A-59, IV.A-66, IV.A-73, and IV.A-75 through IV.A-77 of the Draft EIR, air quality impacts would be less than significant for all criteria pollutants after the application of mitigation, except for regional construction NO_x emissions, and regional

overlapping construction plus operational VOC and NO_x emissions during the long-term buildout scenario. In addition, construction and operational localized air quality impacts would be less than SCAQMD's significance criteria for all pollutants (see Tables IV.A-10 and IV.A-11 of the Draft EIR). Additionally, a quantitative HRA, which includes an analysis of carcinogenic and non-cancer risks (such as respiratory issues) was developed in response to SCAQMD's comment on the Draft EIR and is included as Appendix FEIR-10 of this Final EIR. As discussed on pages IV.A-72 and IV.A-73 of the Draft EIR, and further confirmed by the results of the quantitative HRA, the Project is not expected to generate substantial TAC emissions or result in significant contributions to human health hazards in the Project area.

Comment No. 436-5

There is a historic district to the north of the project site. Thousands of cars and trucks will be traveling through the community. What will be the impact on the historic district?

Response to Comment No. 436-5

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10 regarding impacts to the Beverly Fairfax Historic District and how an increase in trips will not affect the integrity of the Beverly Fairfax Historic District.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding cut-through effects on adjacent neighborhoods and the proposed NTMP.

Comment No. 436-6

As leaders, it is imperative these concerns be addressed. The EIR has failed to answer many questions and the community members fear this project will do more damage than good.

Response to Comment No. 436-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 436-2 through 436-5.

Comment Letter No. 437

Gary Randall
139 S. Edinburgh Ave.
Los Angeles, CA 90048-3605

Comment No. 437-1

Energy-related aspects of the project's design are not clear to me—

1. **What is meant by the EIR's "fueling stations and vehicle repair?" Does this mean there will be a gas station and mechanic shop on the site? If so, where will it be located? Where does the EIR evaluate the impacts from having a fueling station next to residences?**

Response to Comment No. 437-1

The Project would not include fueling stations or vehicle repair shops. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 437-2

2. **Will the power generators used at the basecamps run on diesel? If so, has the EIR analyzed the toxic emissions and noise from these generators? Will they run 24 hours a day/7 days a week? Will the generators be electrified? There is no reason that the site cannot be 100% electric.**

Response to Comment No. 437-2

This comment is substantively similar to Comment No. 188-4. Refer to Response to Comment No. 188-4, above.

Comment No. 437-3

3. **Why is the project planning to use natural gas, especially if you'll be building this project through 2043? Aren't new buildings supposed to be fully electric to address global warming?**

Response to Comment No. 437-3

Refer to Response to Comment No. 45-1 regarding the Project's compliance with City Ordinance No. 187714 (all-electric buildings ordinance) and natural gas usage associated with the Project.

Comment No. 437-4

4. Finally, doesn't this area of LA have naturally-occurring methane that will create a safety problem for the underground studios you are building? Will the methane build up and risk explosions in my neighborhood like the Ross that exploded?

Response to Comment No. 437-4

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding methane.

Comment No. 437-5

The project should address all of these issues: the EIR says that a plan will be created, but provides no detail.

The plan should be developed now so that the public can review it to ensure it is adequate for our safety.

Response to Comment No. 437-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 437-2 through 437-4. See the Preliminary Draft Specific Plan, which has been made publicly available on the Department of City Planning's website.

Comment Letter No. 438

David Ravanshenas

Comment No. 438-1

Television City is in the heart of Los Angeles and has been an icon in the entertainment industry for almost 70 years. It's about time that the studio gets a facelift.

The TVC 2050 project will allow the studio to celebrate its past while preparing for its future. An improved and modernized technological infrastructure will create a highly sought-after studio facility for production. This plan represents a major investment in the entertainment industry, the Beverly/Fairfax community, and the city.

Keeping production here in Los Angeles is key to our city's long-term economic success. This project is a win-win for everyone.

Response to Comment No. 438-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 439

Mimi Ravnoy
329 Fuller Ave.
Los Angeles, CA 90036-2522

Comment No. 439-1

I live within the Beverly Fairfax Historic District more than 18 years. The fact that the project's EIR concludes there won't be any effects on our historic district worries me a lot, I mean a real lot. The EIR I have seen over the last 20 years do not really assess the traffic and problems.

Response to Comment No. 439-1

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project, including Project trips, would not significantly impact the Beverly Fairfax Historic District. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 439-2

The Project's construction years are discussed in the EIR, but not with any clarity. Is construction going to be for three years? What does it mean that construction could be up to 20 years? Does that mean construction could be going on for 20 years in our community? We are a community of pedestrians, and children and families frequently stroll around our neighborhoods to visit one another's homes and attend religious services. Does the city expect that our lives could be affected by noise, more traffic, trucks all week long, closures, more cars driving through our neighborhood—for up to 20 years?

Response to Comment No. 439-2

The Applicant's desire is to construct the entire Project in one construction phase, subject to market conditions. A one-phase construction schedule would complete the Project in an approximately 32-month time period. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

If the Project is not built in one phase, it could be built in multiple phases over the 20-year time limit of the Development Agreement. However, the Project involves a working studio with sound stages that are sensitive to both noise and vibrations, so it is very unlikely that continuous construction would be compatible with the land uses in the Project.

The Construction Traffic Management Plan described in Topical Response No. 14, Construction Vehicle Impacts, would address the issue of construction traffic driving through the neighborhoods and would seek to minimize the effects of any roadway or lane closures. Again, there is no plan to develop a construction program that would result in daily construction traffic and noise for a continuous 20-year time span.

Comment No. 439-3

In addition, it will ruin our way of life and interfere with the very cultural Importance that has made Beverly Fairfax a historic area. Did you evaluate the effect all the construction activities will have on visitors to the historic area boundaries? Where is that analysis? Can you point to findings that construction trucks and employees are not going to be driving through our communities at all hours of the day and night? When and how will construction trucks will be routed? Will trucks being using an entrance that runs along Fairfax, pulling out into traffic to get to the freeway?

Response to Comment No. 439-3

This comment is identical to Comment No. 257-3. Refer to Response to Comment No. 257-3, above.

Comment No. 439-4

Please inform me of any city actions about this project.

Response to Comment No. 439-4

All commenters are added to the notification list for the Project. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 440

Andrew Ray
530 N. Alta Vista Blvd.
Los Angeles, CA 90036-1967

Comment No. 440-1

I am writing to express my concern and opposition toward the TVC 2050 project and its impacts on the community. I am very confused because I have looked through the Draft EIR and I still don't know what uses the developer actually intends for the project site!

Response to Comment No. 440-1

As discussed throughout the Draft EIR, the Project is a studio project. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 regarding permitted uses.

Comment No. 440-2

Warehousing and "conference facilities?" What does the developer intend to do with those uses, exactly? And what impacts will those uses have on the community and the environment? Because I tried to find those impacts in the document and they seem totally missing. How can the impacts of different "uses" that are not spelled out in the first place even be analyzed? The project developer wants to have flexibility, but if the uses change, will those uses then be studied?

In fact, the Draft EIR seems to say that ANY use in the C2 zone will be permitted on this lot. That's a lot of uses. If the developer intends to tell us that their project could include any of those uses, then the developer should also be obligated to tell us the impact of the entire range of uses allowed on the property. Where is that analysis—of all the impacts of all the uses that could potentially be allowed? If they are allowed to do anything that is permitted in a C2 zone, will the city require them to study the impact of each of those uses? If not, why? It seems like they are trying to sneak in additional uses that the neighborhood may object to.

If the project is allowed to build a fueling station and vehicle repair facility, then we should know what the air quality, safety, and traffic impacts would be on surrounding residents. So, what uses will the developer actually be permitted to have on the site?

Response to Comment No. 440-2

Based on comments received in response to the Draft EIR, the list of permitted uses was clarified to reflect the studio objective of the Project, including, among other things, removing the C2 zone text referenced in this comment (even though these uses are currently permitted); refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses—sound stage, production support, production office, general office, and retail—as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the EIR.

Comment Letter No. 441

Ziggy Rees
1324 N. Spaulding Ave.
Los Angeles, CA 90046-4010

Comment No. 441-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 441-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 442

Alison Reeves
6253 Simpson Ave.
North Hollywood, CA 91606-3415

Comment No. 442-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 442-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 443

Leah Reichman
326 Vista St.
Los Angeles, CA 90036-5739

Comment No. 443-1

I have been living in the Beverly Fairfax community for quite some time now, and I can tell you that there are obvious problems with the Television City plan as it stands right now.

Response to Comment No. 443-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 443-2 and 443-3.

Comment No. 443-2

For starters, parking in the nearby streets of the surrounding neighborhoods is going to be an issue. This is already a problem, and you are going to exacerbate it. The fact that this problem already exists is enough of a reason for this project to be reconsidered. Why hasn't that been more obvious to city planning? Was time spent by planning department staff in our neighborhoods and in the community to see what parking is like now? And then extrapolate the number of employees and visitors expected at the new space, along with their cars, onto those findings?

Beyond the existing problem been made much worse by this project, I feel that not everything was made clear to us. One question I want to be answered is what is an off-site parking agreement or covenant? Can you provide specific examples? Who agreed upon these? How many of them exist? What does the agreement for our area state when it comes to this project? And if the agreement has not been prepared yet, why not? How are we supposed to know how these parking problems are going to be addressed?

Similarly, what makes an agreement or covenant "satisfactory" to the Planning Director? Who is the Planning Director? What is their background? What metrics do you use to quality and fulfill the term "satisfactory." This seems very subjective to me.

I also think it would be fair for the community and the affected residents to have some input. When is there going to an [sic] opportunity for us to know about and provide input

into an agreement or covenant? This issue of parking is a fairly large and impactful issue that residents should know about.

Please explain how off-site parking is going to affect the safety of our neighborhoods? Are there going to be more cars on residential streets where our children play and run around? How many more cars do you think will be going through the side roads because of more traffic caused by the project? If the city does not know this yet, it should before this project goes any further.

Parking in the nearby streets of the surrounding neighborhoods is a problem that we already have to deal with, and I think it is unfair and insensitive to blatantly make the problem worse. Please answer the questions above. Thank you.

Response to Comment No. 443-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language referenced above was deleted from the Draft EIR.

Regarding neighborhood intrusion, refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 444

Amy Reiley
amy@lifeofreiley.com

Comment No. 444-1

Please find my submission of comments on the DEIR of TVC 2050. My comments are in the body of this email, below as well as attached as a pdf.

Please send a response acknowledging receipt of this submission.

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the proposed Television City Project

I am a homeowner and mother living in the area. I have reviewed the EIR and have several concerns about the proposed project based on the findings of the Environmental Impact Report

Response to Comment No. 444-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 444-2 through 444-11.

Comment No. 444-2**Change of Zoning**

Section 3.4 discusses that a change of zoning would be necessary for the site to Regional Center. I am concerned, first of all, that the level of building density that would necessitate a zoning change is an indication in itself that the scope of this project is outside of a size this neighborhood can support. Areas [sic] of investigation in the EIR point to this assertion being a correct one.

Secondly, if it is so simple to change the zoning of a parcel as simply making a plan large enough that it cannot exist within the current zoning, what's to stop developers from requesting Regional Center designation on plots all over the neighborhood? Once the precedent is set with this project, is there really any viable reason to deny every other developer that request it? Yet, as I mentioned, the EIR points to multiple indicators that the area cannot support a single Regional Center.

Response to Comment No. 444-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. The proposed Regional Commercial land use designation would serve to create a cohesive Project Site subject to uniform land use regulations, while recognizing the unique studio land uses that have been operating on-site for many decades. Refer to Response to Comment No. 11-3 regarding the size of the Project.

Comment No. 444-3

- Conditional Use

It does not appear that there will be any conditional use applied to this project along with the up zoning to Regional Center. Whether or not a plan to up-zone the plot is granted, I cannot understand why there is no conditional use. What is to stop the developer from getting the project up-zoned then flipping it to a hotel and shopping retailer? The argument for expanding Television City is because Los Angeles has a lack of central television production facilities. It is absolutely essential that the specific use as a production facility be a condition of this expansion.

Response to Comment No. 444-3

The Project includes the creation of a specific plan, which is a land use ordinance enacted by the City Council. Citywide, specific plans and other overlays are commonly used to prescribe use and floor area limitations differing from standard LAMC provisions.

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 regarding the proposed Regional Commercial designation. As discussed therein, the Regional Commercial designation does not permit upzoning at the Project Site or result in a major change in the identity of the community. The Project could be requested and approved regardless of whether the land use designation is modified to “Regional Commercial” or the existing Community Commercial, Limited Commercial, and/or Neighborhood Commercial designations are retained. As discussed in Response to Comment No. 444-2, the proposed Regional Commercial land use designation would serve to create a cohesive Project Site subject to uniform land use regulations, while recognizing the unique studio land uses that have been operating on-site for many decades.

Television City has been a studio for over 70 years, and the proposed Specific Plan will ensure that the Project Site will continue to operate as a studio in the future. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6

regarding the five permitted studio uses and the studio purpose of the Project. The Project would not permit hotel uses or a shopping center as suggested by the commenter.

Comment No. 444-4

It is the final section of the EIR, XXI in which you can see clearly, immediately and without question how it is almost impossible to imagine the area can support a Regional Center designation. This section flags multiple environmental issues that could have significant impact on the wellbeing of local residents. I have concerns and questions as to how many of these issues will be tackled.

Response to Comment No. 444-4

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation, which was fully analyzed in the Draft EIR in accordance with CEQA.

It is unclear to which section of the Draft EIR this comment refers as the Draft EIR does not include a Section XXI. If the commenter is referring to Section XXI of the Initial Study included as Appendix A of the Draft EIR, the purpose of an Initial Study is to identify potentially significant impacts that require further evaluation in the Draft EIR. All of the potentially significant impacts identified in Section XXI of the Initial Study are thoroughly evaluated in the Draft EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 444-5

Air Quality

According to the South Coast Air Quality Management District (AQMD), particulate emissions from both construction and operations may increase stationary and mobile emissions in the area to the point where AQMD cannot meet their Air Quality Emission Plan, which would be counter to federal and state clean air acts. The EIR goes on to note that the project has the potential to expose sensitive receptors to substantial pollution concentrations.

As a parent this concerns me and I want to know what will be done either to reduce emissions or to offset the emissions created by Television City to keep the area aligned with clean air acts. This project should not be approved without a clear plan of action to keep it within the limits of state and federal clean air acts.

Response to Comment No. 444-5

The commenter appears to refer to Table IV.A-9 in Section IV.A, Air Quality, of the Draft EIR, which indicates that without the application of mitigation, the Project would result in significant emissions of particulate pollutants. Table IV.A-11 indicates that, after the implementation of applicable Project mitigation measures, the Project would not exceed the SCAQMD thresholds or result in exposure of sensitive receptors to substantial pollutant concentrations. Refer to Response to Comment No. 26-E.1-21 for a discussion of the analysis of localized air quality impacts. Please refer to Response to Comment No. 26-E.1-2 for additional details on health impacts to nearby sensitive receptors.

Comment No. 444-6**Geology and Soils**

The EIR indicates that because of the location of the project and the intended deep excavation, this project has the potential to cause seismic ground shaking and even possible liquefaction. I want to know if a seismic study will be ordered before this excavation is approved. And if not, why would this be deemed unnecessary and how do you plan to mitigate potential seismic risk?

Response to Comment No. 444-6

Refer to Response to Comment No. 26-E.3-13 regarding seismic-related impacts.

Comment No. 444-7**Greenhouse Gas Emissions**

EIR findings state that this project will increase greenhouse gas emissions in the area. We live in a time when this factor cannot be ignored. Further investigation must be undertaken to ensure that this project meets—or better yet beats—regulations adopted for the reduction of greenhouse gases.

Response to Comment No. 444-7

The Draft EIR provides a thorough analysis of the Project's GHG impacts within Section IV.E, Greenhouse Gas Emissions, of the Draft EIR. As concluded therein, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. With the implementation of the PDFs and compliance with applicable regulatory requirements, the Project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, the Project's impacts with regard to climate change would be less than

significant. Refer to Response to Comment No. 26-E.1-37 regarding the applicable thresholds of significance used to assess the Project's potential GHG impacts.

Comment No. 444-8

Public Services

As the mother of two young children, one of the areas of the EIR of greatest concern to me is the finding that this project could potentially put a huge strain on our fire and police resources. I want to know what further investigation is being done to ensure that the area will have sufficient fire and police resources to service the established community as well as this new Regional Center. And, if additional fire and police resources were necessary, how will this shortfall be addressed?

Response to Comment No. 444-8

With regard to the adequacy of LAFD fire protection services and infrastructure and LAPD police protection services to serve the Project, refer to Response to Comment Nos. 9-35, 16-5, 16-10, and 26-147. Also refer to Response to Comment No. 16-5 and pages IV.J.2-12 and IV.J.2-13 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR regarding the Project's security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation.

Comment No. 444-9

Transportation

The most obvious area of impact from this proposed development is the additional surge of traffic in an already congested area. Although the additional traffic caused by construction is a temporary issue, it will cause a significant impact on both pollution and noise, particularly since a scheduled truck route for excavation and fill take all vehicles directly past the campus of Hancock Park Elementary. The impact of construction traffic clearly needs further study and routes that don't take multiple trucks past an elementary school should be planned.

Response to Comment No. 444-9

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and

Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Section IV.I, Noise, of the Draft EIR for a discussion of construction noise. As discussed on pages IV.I-40 through IV.I-43 therein, noise impacts from construction trucks would be potentially significant. However, there are no feasible mitigation measures to reduce the temporary significant noise impacts associated with the off-site construction trucks. As such, noise impacts from off-site construction truck trips would be significant and unavoidable. It should be noted that this impact would be temporary and cease when construction is complete.

Refer to Section IV.A, Air Quality, of the Draft EIR for a discussion of construction air quality impacts. As discussed on pages IV.A-59 through IV.A-62, air quality impacts from construction trucks would be potentially significant. As presented in Table IV.A-8, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_x emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. As such, Project construction would result in a significant Project-level and cumulative impact related to regional NO_x emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable. Refer to Response to Comment No. 426-4 regarding emissions near the school. As discussed therein and shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with incorporation of mitigation measures. The Project also includes a quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Refer to Response to Comment No. 26-E.1-2 for further discussion of the HRA.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Comment No. 444-10

Additionally the increase in size and significant increase in employees of Television City will represent an increase of vehicular traffic now and forever. The EIR investigation seems woefully incomplete when it comes to reflecting [sic] impact [sic] the existing neighborhood businesses and residential areas. Since the property is surrounded on three sides by residential neighborhoods, why is there no detailed study on cut through traffic? I want to see greater detail of how the increased traffic will impact the safety of our residential streets.

Response to Comment No. 444-10

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR). Please note that the commenter is not correct that the Project Site is surrounded on three sides by residential neighborhoods, as the Project Site is located in an urban commercial area.

Refer to Topical Response No. 12, Safety and Congestion regarding traffic safety.

Comment No. 444-11**Historic Preservation**

Lastly, it is wonderful that this project is attempting to save the historic buildings and preserve Los Angeles television history. However it is part of the agreement that the original buildings designated historic be preserved according to certain guidelines, according to section 3.3.4. It is my understanding, based on information sent out by the Los Angeles Conservancy, these guidelines have not been met by the Television City Specific Plan. If the historic site is supposed to be preserved, why isn't it being done correctly? Development of and around these historic properties should not be allowed without the support of the Los Angeles Conservancy.

Response to Comment No. 444-11

Refer to Sections A, Existing Evaluation and Designation of the Primary Studio Complex, B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, C, Potential New Construction North of the Primary Studio Complex, and D, Analysis of Impacts to the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding preservation of the Primary Studio Complex.

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy. Please note that the Los Angeles Conservancy supports the Project.

This comment references certain guidelines and section 3.3.4, but it is not clear what this is in reference to. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 444-12**Conclusions**

I am concerned that this project fails to consider the infrastructure of the neighborhood. It appears to fail on protecting our children's health or the health of the planet for that matter. It puts the area in danger of seismic activity and strains our already congested roadways. And although the owners promised that this Television City makeover would be a celebration of Los Angeles film and television history, they even failed on that count, didn't they?

Response to Comment No. 444-12

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 444-2 through 444-11, above, and 444-13, below.

Comment No. 444-13

In closing, I'm failing to understand why approvals for this project seem to be rushed through before the update of the Wilshire Community Plan. A project, as the owners tell it, of such incredible historic significance and such a monumental addition to Los Angeles film legacy, isn't it too important to rush? I would like to know why the approval of the Television City update cannot wait until we have an updated plan for the region and it can be welcomed as a cohesive part of the neighborhood.

Response to Comment No. 444-13

Refer to Topical Response No. 6, Wilshire Community Plan Update, regarding why development of the Project does not need to occur after the Wilshire Community Plan update is complete.

Comment Letter No. 445

Cole Resnick
540 N. Croft Ave.
Los Angeles, CA 90048-2545

Comment No. 445-1

According to the plans, construction on this project won't be done until 2043, which sounds like the title of a science fiction movie.

Response to Comment No. 445-1

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Comment No. 445-2

In the meantime, we will have to deal with 20 years of unbelievable traffic, endless parking headaches, diesel-belching construction trucks rumbling and idling in our community, thousands of random people on our streets, the release of methane gas from the excavation, loud music and noise from the studio's stages, and 6X the water use.

Response to Comment No. 445-2

Refer to Response to Comment Nos. 5-12 and 9-24 regarding the buildout timeline.

Air quality and noise analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively.

Police protection would continue to be provided by LAPD. Potential impacts associated with police protection were fully analyzed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and were determined to be less than significant.

Section IV.F, Hazards and Hazardous Materials, of the Draft EIR fully analyzes impacts with respect to methane. As discussed therein, impacts would be less than significant through a combination of adherence to the City's Methane Code and implementation of Mitigation Measure HAZ-MM-2. Refer specifically to pages IV.F-43, IV.F-46 and IV.F-47, and IV.F-53 and IV.F-54 of the Draft EIR. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 with respect to this topic.

Water supply is analyzed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR. As discussed therein, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project's operational impacts on water supply would be less than significant.

Comment No. 445-3

And at the end of those 20 years, the outcome will be a massive studio with 14 stages which will totally change the feel of our neighborhood. Why is the City of LA pushing this unwanted project on us? Doesn't our opposition count?

Response to Comment No. 445-3

Refer to Response to Comment No. 9-24 regarding the buildout timeline. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 446

John Reuter
888 E. Walnut St.
Pasadena, CA 91101-1895

Comment No. 446-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelinos it supports will continue to thrive.

Response to Comment No. 446-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 447

Jane Rhodes
517 Vista St.
Los Angeles, CA 90036-5744

Comment No. 447-1

I am sure you have been getting plenty of questions about the proposed studio expansion. As a 22 year resident, I am increasingly concerned about the city's housing crisis, and I'm especially worried how this massive project will negatively impact our housing supply.

Response to Comment No. 447-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 447-2.

Comment No. 447-2

Last I heard, there is no residential development coming with this project, not a single unit of housing for anyone. However, this development will bring thousands construction workers and employees to the community. Why should we support a new commercial development that is going to take up a huge chunk of space and real estate if it doesn't have any new housing? Why isn't housing being included? And why isn't housing being required, given how many additional people this project would be bringing into the area? Can you please provide an alternative plan that includes housing? Where will all these workers and employees live when there is already a housing shortage in the area?

In addition to the issue of incredibly limited housing options, I'm worried how this project will affect housing prices. How is it beneficial to add more development to this community if housing is already very unaffordable? If you do provide an alternative plan with housing, can you please ensure that there are multiple affordable housing options? By adding additional development, you will raise the cost of living, rents, groceries, utilities, parking costs, etc. And the project won't even add a single home or residential unit to the housing supply. No thank you!

Have you studied how this project will affect the cost of living in the area? How will the project affect rental rates? How will the project affect home prices? Will residents be displaced from their home because they cannot afford to live in their own neighborhood? What about landlords who will evict their tenants in order to raise the rent?

Response to Comment No. 447-2

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, the provision of housing, and the consideration of economic and social effects under CEQA. This comment raises a number of non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment No. 447-3

I strongly hope you will pass my concerns along to the developer and ask why such a proposal does not include any kind of new housing, affordable or otherwise. I cannot support a project of this size if it does not increase the housing supply in our neighborhood.

Response to Comment No. 447-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 447-2.

Comment Letter No. 448

Thomas Rice
437 1/2 N. Spaulding Ave.
Los Angeles, CA 90036-2291

Comment No. 448-1

I am a resident of the area for 9 years. I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I continue to learn about the details (although not many have been provided to the public) about this development right in my back yard.

Response to Comment No. 448-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 448-2

I'm concerned about the walkability and safety, parking congestion, new traffic, and how long this development will go on and disrupt the neighborhood.

Response to Comment No. 448-2

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 16-72 and 26-E.4-3 regarding pedestrian safety and the Project's pedestrian-oriented design.

Under SB 743, the adequacy of a new development's parking supply and congestion are not CEQA considerations. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 448-3

We have so many questions as neighbors: How do you expect all these new employees to get to work? Where do they park? How am I, as a neighbor, supposed to navigate this new congestion on the streets? Do any of you all live this area? Are you riot concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Response to Comment No. 448-3

This comment is substantially similar to Comment No. 95-2. Refer to Response to Comment No. 95-2, above.

Comment No. 448-4

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Response to Comment No. 448-4

This comment is identical to Comment No. 95-3. Refer to Response to Comment No. 95-3, above.

Comment No. 448-5

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I pray and hope that you do the same with this development.

Response to Comment No. 448-5

This comment is identical to Comment No. 95-4. Refer to Response to Comment No. 95-4, above.

Comment Letter No. 449

Kate Richter
427 N. Alta Vista Blvd.
Los Angeles, CA 90036-2540

Comment No. 449-1

The developer is asking for a zone change based [sic] to make his development financially pencil out. The City Planning Department has included an objective regarding the developer getting a return on its investment. If I now what [sic] to get a change in zone and the community plan for my property, is the City going to change the rules for me so that I can make a reasonable rate of return on my investment? No matter how much I overpay for the property?? If the developer didn't factor in the existing development rules properly when making its investment, why does the neighborhood have to pay the price? What evidence does the City have regarding the developers financial investment to evaluate this issue?? It should be provided in the Draft EIR. How can we evaluate if the Developer is making a reasonable return?

Response to Comment No. 449-1

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 449-2

What financial information did the City have. Has the City retained a financial consultant to review this information from the TVC developer? Is this even a proper consideration for the City?? Has the City done this for other projects? What projects? If the City is using this kind of information to evaluate projects, what is the City's policy on what is a reasonable rate of return?? Please provide a copy of the policy?

Response to Comment No. 449-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 450

Ken Ridnor
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 450-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 450-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 451

Matt Ritchley
417 N. Gardner St.
Los Angeles, CA 90036-5754

Comment No. 451-1

I am a concerned resident of the Beverly Fairfax community. After learning more about the Television City project and its Draft Environmental Impact Report, I felt led to voice my opinions and concerns. I have listed several questions I have about the project, and I am hopeful that the city and the developer will take the time to read and thoroughly answer each of them.

Response to Comment No. 451-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 452-2 through 452-4.

Comment No. 451-2

Primarily, I am worried about the presence of hundreds of construction trucks in my neighborhood. The conceptual plan shows that tons of 18-wheeler trucks can be on the project site at any one time. The conceptual plan, however, fails to tell neighbors how many there will be. Will there be 15? 50? 100? Will they all be 18-wheelers, or will there be dump trucks as well? Where will they park? What hours will they be driving to and from the property? Will their parking spaces be visible from residential property lines? I am concerned about the eye-sore that this many trucks in my neighborhood would create, especially if this project takes 20 years to complete.

Response to Comment No. 451-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Section 5D beginning on page 179 of the Transportation Assessment (Appendix M.1 of the Draft EIR) details the number of trucks trips associated with the two busiest activity times of the construction process—excavation/foundation and building interior finishes. The heaviest truck movements occur during the excavation and foundation phase when the Transportation Assessment shows on page 181 that up to approximately 320 trucks per

day could be expected to enter the Project Site. These trucks would enter and leave the Project Site between 7 A.M. and 4 P.M., and this phase of the construction program would last approximately 8.5 months.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Entrances to the Project Site on both Fairfax Avenue and on Beverly Boulevard would be used for construction truck access to the Project Site.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and to Response to Comment Nos. 178-3, 183-1, and 231-4 regarding off-site staging. All haul truck staging locations would be provided on-site; accordingly, no haul trucks would be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

With respect to parking during construction, the Project includes a CTMP pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 to IV.K-37 of the Draft EIR), which would include a prohibition of construction worker or equipment parking off-site.

The Project Site would be secure during construction surrounded by the fence and landscaping present on the Project Site today. Therefore, it is likely that trucks and cars parked on the Project Site would not be visible from the residential neighborhoods.

In accordance with LAMC requirements, construction activities generally would be permitted to occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays, or outside of these hours if a temporary noise variance is approved by the Los Angeles Board of Police Commissioners.

Lastly, the goal of the NTMP described in Topical Response No. 9, Neighborhood Traffic Management Plan, is to keep both construction and Project trips out of the neighborhoods near the Project Site.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 451-3

Furthermore, I am worried about the environmental impact of this project. LA already deals with smog and excess carbon emissions, so I'm worried that this project will severely exacerbate this problem. Have the environmental impacts of the trucks been fully analyzed? What did your analysis conclude about increased greenhouse gas emissions? Please cite specific studies. If studies have already been conducted, did they look at the

impact of 50 trucks vs. 100 trucks? What about 200 trucks? Until we know how many trucks will be on-site, having all the possibilities included in the study is essential.

Response to Comment No. 451-3

Refer to Response to Comment No. 231-3 for a detailed response regarding potential health risk impacts related to diesel trucks. Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding the number of construction trucks. Refer to Response to Comment No. 87-1 regarding emissions related to production trucks and Response to Comment No. 26-E.1-16 regarding the number of operational trucks.

Refer to Sections IV.A, Air Quality, and IV.E, Greenhouse Gas Emissions, and Appendix B of the Draft EIR, which analyze the air quality and GHG impacts associated with trucks.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risks from the Project, including risks associated with truck trips, would be below the applicable significance thresholds and impacts would be less than significant.

Comment No. 451-4

I am also worried about the traffic created by these trucks. In the conceptual plan, there doesn't seem to be a traffic-calming way for large trucks to make left hand turns onto the project site. Have proper analyses been done to evaluate what additional traffic these left turns would create? Has the city considered putting arrow signals on the traffic lights around the project site? Will a truck detour be created?

Response to Comment No. 451-4

The vast majority of the trucks would enter the Project Site through one of the three signalized entrances, which would all be equipped with green left-turn arrows. Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Comment No. 451-5

The concerns outlined above are shared by many Beverly Fairfax residents. I hope the city will take the time to answer my questions about the Television City project.

Response to Comment No. 451-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 451-2 through 451-4.

Comment Letter No. 452

David Roa
302 S. Orange Dr.
Los Angeles, CA 90036-3009

Comment No. 452-1

The EIR for the Television City proposed development has some holes, or at the least, hard-to- understand parts in it.

Response to Comment No. 452-1

This introductory comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 452-2 through 452-6.

Comment No. 452-2

Most specifically, I would like to understand the Vehicle Miles Travelled portion(s).

How was the analysis of Vehicle Miles Travelled completed? The model is difficult to comprehend so please explain in more detail how this information was determined. What assumptions are made when doing that analysis? What if the assumptions for this area and this project are wrong? There should be specifics to show citizens how the model worked to provide context for the analysis and information presented in the EIR.

Response to Comment No. 452-2

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

The use of the VMT Calculator and the assumptions therein were approved by the City of Los Angeles Department of Transportation in the Assessment Letter that is presented in Appendix M.2 of the Draft EIR.

Refer to Response to Comment No. 209-7 for additional discussion of VMT.

Comment No. 452-3

The EIR appears to say that the average distance to a regional movie production facility with 1.5 million square feet of offices is 3.5 miles. How was this number reached? If people working in production must get to the studio, it does not seem possible that this 3.5-mile amount is correct. Studios such as Disney are in Burbank. Workers for these types of jobs often live in the San Fernando Valley. Does the developer of this project have good information about where people live who will work there? If so, where will that be? If the developer doesn't have good information about that, then how can your assumptions hold up?

Response to Comment No. 452-3

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

There is no recommendation in City or State guidance on VMT analysis to use empirical trip lengths when a model-based solution that combines trip thresholds and Project analysis is available. Critically, it is necessary in conducting VMT analysis that both the thresholds of significance and the Project-level VMT estimates are developed using the same data source in order to ensure an apples-to-apples comparison. Therefore, the VMT analysis presented in the Draft EIR is appropriate and accurate for Project VMT analysis.

Comment No. 452-4

Additionally, the number of people taking public transportation may have been used in the calculations and analysis. What are the statistics of people who work in offices and/or production using buses or other public transportation? What about people who work remotely now? My experience is that drivers in LA would be solo drivers. What research is available showing the percentage of people who might work at the site might actually use public transportation, ride share, or other less environmentally harmful methods?

Response to Comment No. 452-4

The Project is anticipated to attract 15 percent of its employees and less of its visitors via transit, bike, and walk modes. Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment Nos. 26-156 and 107-4 for a discussion of the potential effectiveness of transit and TDM.

With the Project's extensive TDM Program, including the shuttle bus between the Metro D (Purple) Line Wilshire/Fairfax Station and the Project Site, the Project is expected to exceed these estimates.

Comment No. 452-5

I would like details used to create the Vehicle Miles Travelled about all the others, not employees, who will also be making many trips to the site. For example, there will be many audience members attending tapings or events at the proposed facility. How were their Vehicle Miles Travelled included in the EIR? Or, if they were not, it should include this information. Where will those people live/be travelling from? How would this information be able to be gleaned?

Response to Comment No. 452-5

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 452-6

Finally, I am interested in the Vehicle Miles Travelled for the many construction vehicles and delivery trucks that will be clogging the neighborhood streets during the years of construction followed by the potentially limitless time of active use of this facility? How far will construction vehicles be traveling to bring materials to the site? And how far will they have to go carrying out the debris and dirt from excavation? How far will delivery trucks bringing production materials and supplying the needs of the thousands of office workers be driving to get to the site? Were these additional Vehicle Miles Travelled calculated for the EIR?

Response to Comment No. 452-6

Delivery truck trips to/from employment centers and construction truck trips are exempt for the calculation of work VMT per employee. The threshold for work VMT per employee of 7.6 for employment centers in this portion of the City of Los Angeles is based solely on employee work trips. Refer to Topical Response No. 8, Vehicle Miles Traveled.

Section 5D of the Transportation Assessment (Appendix M.1 of the Draft EIR) discusses the construction traffic analysis and cites the primary destination for the excavation haul routes as the Irwindale landfill. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Comment Letter No. 453

Beth Robbins
461 N. Harper Ave.
Los Angeles, CA 90048-2220

Comment No. 453-1

I'm writing to express my concern about the planned TV City expansion and how it will affect the neighboring residents of the development.

Response to Comment No. 453-1

This comment is identical to a portion of Comment No. 54-1. Nevertheless, this introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 453-2 through 453-6.

Comment No. 453-2

I think that there are still many questions about traffic impacts that have not been addressed in the plan or in the draft EIR.

This project also causes problems for people who would like to use these community amenities, like with their access and parking? Any analysis of the impacts of this development is incomplete without a traffic analysis on Grove Drive. Of course all that traffic will spill out onto neighboring roads, how could it not? How much neighborhood spill over is expected and how will it affect residents, and what is being proposed to deal with that?

Response to Comment No. 453-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access to and use of The Grove Drive.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 453-3

I am also concerned with how close the development will be to many of the apartments in the area. Truck traffic from construction and hauling soundstage equipment will be driving along residential streets, and some of these stages are being planned for right next to apartments.

Response to Comment No. 453-3

Residential uses near the Project Site have been taken into consideration in the Draft EIR. As discussed in Section IV.A, Air Quality, of the Draft EIR, localized air quality impacts associated with construction would be less than significant. Refer also to Response to Comment No. 26-E.1-2 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. In addition, as discussed in Section IV.I, Noise, of the Draft EIR, potential impacts associated with on-site construction activities at off-site sensitive receptors would be reduced to less-than-significant levels with the incorporation of mitigation measures, with the exception of the sensitive uses represented by receptor location R1 (e.g., the Broadcast Center Apartments). During construction, vibration impacts associated with human annoyance at receptor location R1 and along the haul routes would be significant. Vibration impacts associated with building damage would be less than significant.

As discussed in detail in Sections IV.A, Air Quality, and IV.I, Noise, of the Draft EIR, operation of the Project would not result in significant localized air quality or noise impacts. Construction trucks would not be allowed on residential streets. Trucks that move on local streets and haul trucks that move on streets other than the haul routes are subject to ticketing by the LAPD. A Construction Manager would be appointed by the Project and his/her phone number would be advertised on the Project website and communicated to the neighbors so that trucks on the local streets could be reported to the Construction Manager who in turn could call for targeted enforcement.

Project trucks during the operation of the completed Project would not need to use the residential streets in the vicinity of the Project Site and restrictions on these vehicles could be discussed as part of the NTMP.

Comment No. 453-4

What kind of noise and air pollution will be affecting the apartment residents and other residents? All expected risk of health problems for residents should be made clear—what does the data indicate?

Response to Comment No. 453-4

This comment is identical to the last two sentences of Comment No. 54-4. Refer to Response to Comment No. 54-4, above.

Comment No. 453-5

What about the loss of property value for the actual apartment owners? It's unclear that an economic study was done about impacts to property values; where is that study? Apartment owner and tenants should know what to expect because that information is not being made available or very easily.

Response to Comment No. 453-5

Property values are not a CEQA issue. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Section 15131). Substantial evidence must be provided to demonstrate a reasonably foreseeable physical impact on the environment from the economic or social change, and no such evidence is provided in the comment. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 453-6

Trucks could also be a general traffic nuisance unless there are dedicated turn lanes on this project, and even putting in turn lanes can be extremely disruptive especially if not at a light but in the middle of the street. What is planned for turn lanes, if anything? Where would they be located? I do not see any plans to add these lanes for the massive trucks that will be needed for this project.

Response to Comment No. 453-6

Refer to Response to Comment No. 83-1 regarding turn lanes.

Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Comment No. 453-7

Please make sure that any deal is one that benefits the people already living near TV City property.

Response to Comment No. 453-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 453-2 through 453-6.

Comment Letter No. 454

Michael Robertson
167 S. Vista St.
Los Angeles, CA 90036-2707

Comment No. 454-1

I hope this letter finds you well. I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I'm devastated as I continue to learn about the details (although not many have been provided to the public) about this development right in my back yard.

I have lived in LA for 15 years and developments like this, and its implications, I can't fathom how that is possible to remain in my neighborhood. More than that, I can't fathom how city leaders, like you all, would allow for something like this.

Response to Comment No. 454-1

This comment is substantially similar to Comment No. 125-1. Nevertheless, this introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 454-2 through 454-4.

Comment No. 454-2

We have so many questions as neighbors: How do you expect all these new employees to get to work?

Response to Comment No. 454-2

This comment is identical to a portion of Comment No. 95-2. Please refer to Response to Comment No. 95-2, above.

Comment No. 454-3

Where do they park?

Response to Comment No. 454-3

This comment is identical to a portion of Comment No. 95-2. Please refer to Response to Comment No. 95-2, above.

Comment No. 454-4

How am I, as a neighbor, supposed to navigate this new congestion on the streets?

Response to Comment No. 454-4

This comment is identical to a portion of Comment No. 95-2. Please refer to Response to Comment No. 95-2, above.

Comment No. 454-5

Do any of you all live this area? Are you not concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I pray and hope that you do the same with this development. We need more leaders fighting for a better future, not just fighting for a big check.

Response to Comment No. 454-5

The first paragraph of this comment is identical to a portion of Comment No. 95-2. The second and third paragraphs of this comment are identical to Comment Nos. 95-3 and 95-4, respectively. Refer to Response to Comment Nos. 95-2, 95-3, and 95-4, above. This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 455

Rena Ronson
418 N. Kilkea Dr.
Los Angeles, CA 90048-2229

Comment No. 455-1

As a resident of a neighborhood near Television City, I feel that the large project to expand it will be problematic. The environmental review excludes some important information that we as citizens deserve to know since its building will impact our quality of life, not to mention safety.

Response to Comment No. 455-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 455-2 through 455-5.

Comment No. 455-2

Both during construction and when the supposed studios are active, there will be many, many additional vehicles, workers, and audience members in this area. What does the increase in traffic mean in terms of parking? I understand that there will be 5,300 parking spaces on site but also some parking offsite. What does offsite parking mean for our streets in the neighborhood?

Response to Comment No. 455-2

This comment is identical to Comment No. 155-2. Refer to Response to Comment No. 155-2, above.

Comment No. 455-3

What about pedestrian traffic? This is a huge walking community. What about the rights and safety of all the different pedestrians when the traffic increases significantly, with more drivers in the area trying to get through backed up intersections? It is already hard to cross at crosswalks now, to cross from one side of the street to another when it isn't at an intersection, but this will make traffic issues practically impossible. Has the city gone out to each intersection to measure traffic? And to measure traffic at different times of the day, and different days of the week? Have you done pedestrian counts along all the major

streets around the project area? What have those studies concluded? Or were estimates and actuarial data used, not real numbers? If not, why not?

Response to Comment No. 455-3

This comment is identical to Comment No. 155-3. Refer to Response to Comment No. 155-3, above.

Comment No. 455-4

The plan for construction includes basecamps that will use power generators. Do these run on diesel fuel? This huge polluter of air and cause of increased noise is unacceptable. This project, if approved, should run completely on electric power, both during construction and when the expanded facility is in regular use. New buildings are supposed to run on electric, so this should qualify. What hours will power generators be used, 24/7? What if the generators break down?

Another source of air pollution will be the many trucks going to and coming from the site for years. It appears that there is not a defined truck route to the site. Please confirm that the trucks carrying construction debris will not be idling and lining up along our residential streets. I can't imagine the stress the additional noise, odors, and activity would cause everyone in this neighborhood. Does the Draft EIR analyze these impacts on the community? What were the conclusions of that analysis? And, does the whole community know what may happen if this project moves forward?

Response to Comment No. 455-4

This comment is identical to Comment No. 155-4. Refer to Response to Comment No. 155-4, above.

Comment No. 455-5

People need to be kept informed in multiple ways so they can express their concerns before this project moves forward.

Response to Comment No. 455-5

This comment is identical to Comment No. 155-5. Refer to Response to Comment No. 155-5, above.

Comment Letter No. 456

Dan Rosenfeld
danrosenfeld.la@gmail.com

Comment No. 456-1

I am writing in support of the TVC 2050 Studio Plan for two fundamental reasons:

1. Support for the filmed entertainment industry in Los Angeles

Second only to our Port of Los Angeles, the filmed entertainment industry is the economic backbone of our community. A strong economy enables all of our other social goals, including education, culture, sustainability and prosperity. Unlike the Port, however, film production can leave Los Angeles. Therefore it is essential—among our top economic priorities—to maintain our high market share in this high value-added, prestigious and creative business sector.

2. Support for creative “adaptive reuse”

The proponent’s plans for TVC 2050 show considerable sensitivity to the classic architectural design of the campus, while tastefully updating and expanding it for contemporary use. This is “adaptive reuse” at its best, consistent with our need to carefully densify and modernize our legacy communities.

We urge support for this application, [sic]

Response to Comment No. 456-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 457

Rich Rossi
406 S. Citrus Ave.
Los Angeles, CA 90036-3537

Comment No. 457-1

As a 25 year resident I urge you to oppose the new studio project that is could dramatically change and wreck my neighborhood.

Response to Comment No. 457-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 457-2

There are many reasons why I am against this project, but the main issue I see is the lack of transparency when it comes to the DEIR' s "trip generation adjustments." It seems that only general and not studio-specific steps were taken, and that is going to be detrimental to anyone's acceptance of this project. If people didn't measure specific impacts on this community, how can we actually know if this is going to be a good thing? Do they plan to measure the specific impact to this community?

According to the DEIR, trip generation for this was based on empirical studies of trip generation at different studios in LA because the Trip General Manual does not provide data for studio-related uses. LA is a big and diverse city, with different neighborhoods and communities in it. One study can't be copied and pasted into another. Where all the studios that were used for this analysis located within LA? What kinds of communities were these studios in? No studios are the same themselves, so did these studios have the same number of employees and similar distances from them to travel?

If there are answers to these questions, how come they weren't added to the DEIR? We as community members have a right to know what information is being used to make decisions by the city that will directly impact us. If adjustments were made on these studies, that's a big deal! We don't want to be promised one thing and then given another.

Response to Comment No. 457-2

Refer to Topical Response No. 10, Trip Generation, for a more detailed description of the derivation of the trip generation estimates for the Project.

The trip generation rates used in the Transportation Assessment (Appendix M.1 of the Draft EIR) are based on trip rates from other Los Angeles area studio complexes. One of the most detailed studies of studio trip generation rates in Los Angeles was conducted for the Universal Studios expansion project. In that study, the trip generation rates of the various elements of the studio campus (sound stages, production support, production offices, and general offices) were developed and validated against numerous ground counts at the Universal Studios entrances. Similar ground counts were conducted at Paramount Pictures Studios and the City of Los Angeles has been monitoring Fox Studios in Century City for years. These data collection efforts have yielded a rich history of trip rates to be used in projecting traffic levels from future studio campuses.

The comment is correct in that studios have varying characteristics when it comes to trip generation because each studio has a unique mix of studio components. The trip generation for the Project used the history of trip generation studies from the individual studio land use components and applied those individual trip rates to the land use mix proposed for the Project. The trip generation study went one step further and completed a detailed count of the driveways at the existing studio and compared those counts to the trip rates used in the Draft EIR. The rates were validated as applicable trip rates for the Project.

Comment No. 457-3

In order to hold this new studio accountable, we need to know what kind of information is being given to officials. Please answer these questions and fully flush out this incomplete DEIR.

Response to Comment No. 457-3

The EIR released to the public is the same document reviewed by City decision-makers. This comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 458

Esther Roth
609 S. Citrus Ave.
Los Angeles, CA 90036-3534

Comment No. 458-1

As a resident of the city, I do not feel as if the draft EIR gives the community enough insight to the Television City project. While we were provided with a conceptual plan, it seems as if there is no actual structure or concrete vision. I don't see how you can give approval to a project of this size if there is no actual plan.

Response to Comment No. 458-1

Refer to Response to Comment No. 5-3. The Project Description meets the requirements of CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description. Furthermore, the Project has not been approved.

Comment No. 458-2

There is a lot of mention of a specific plan that governs the regulations of the project, but is the specific plan in the draft EIR or is it a separate document that has not been provided? When will it be made available? There appears to be inconsistencies with the land use framework discussed in the DEIR and the conceptual plan, such as the building height zones. Please explain. Is the developer bound by the conceptual plan? Is the developer allowed to make changes to the conceptual plan? If so, then what good is any input given by the community? How were analyses and assessments done for a project that is conceptual in nature?

Response to Comment No. 458-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan. As discussed therein, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and

approval, as well as potential CEQA compliance review. As also discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR. Please note that the proposed Specific Plan incorporates the same elements that could result in a physical impact on the environment that were fully disclosed and analyzed in the Draft EIR. Refer to Appendix FEIR-2, Comparison Chart of the Draft EIR and the Preliminary Draft Specific Plan, of this Final EIR.

Comment No. 458-3

In terms of actual project planning, is it known where the buildings will go? How tall will they be? Where will the 14 sound stages go? Is it true that building locations can be moved and when will we know for certain where they will go? What uses have been decided upon and what uses could still be added?

Response to Comment No. 458-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan, the Conceptual Site Plan that was analyzed in the Draft EIR and the regulatory process under the proposed Specific Plan. As discussed therein, the massing and locations of the proposed buildings are depicted on the Conceptual Site Plan included as Figure II-4 on page II-14 of the Draft EIR and are consistent with the architectural plans on file with the City. Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, CPC-2021-4089-AD-GPA-ZC-SN-SP. Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the permitted on-site land uses set forth in the proposed Specific Plan. As discussed in Topical Response No. 1 and Response to Comment Nos. 9-16, 11-3, and 26-7, the Project includes height zone, stepback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. These requirements are not currently required under the existing zoning code. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, stepbacks, and frontage areas associated with the Project.

Comment No. 458-4

The draft EIR has stated that the developer's return on investment is a project objective. Why is that? Why is this developer allowed to do whatever he wants with the project site. The city and community deserve to see the developer's proforma. Since the developer has

included as an objective, the financial information must be made available. The EIR even rejects alternatives because the developer will not make as much profit. Why is that consideration allowed in ruling out a project alternative? It is alarming that the city cares so much about how much money the developer makes off of this project. Is there at least something valuable in return for the city? We need to know what the financials underlying objectives are.

Response to Comment No. 458-4

This comment is substantively similar to Comment No. 133-3. Refer to Response to Comment No. 133-3 regarding the Project's economic objective.

Comment No. 458-5

The DEIR simply fails to provide enough information for the Television City project. There is no way for us to fully understand the impacts that will result if we don't know the location of the buildings, the intended building uses, square footage and the range of potential impacts. Please provide us with a detailed analysis and recirculate is for the city to review and comment.

Response to Comment No. 458-5

As demonstrated in Response to Comment Nos. 458-1 through 458-4 above, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 459

Alex Rotsnansky
aexerotsnansky47@gmail.com

Comment No. 459-1

I have been reading about the proposed TVC 2050 project and have a couple questions about how this project will impact the culture of our neighborhood. We live in an area with many historic and cultural buildings, sites and homes. What will the impacts of this project on all of the historic places in our community? How can the community view the results of any study that spells out those impacts? What is the developer required to do to protect historic places and within what distance all around the project site? What is being proposed to continue to protect those important places?

Response to Comment No. 459-1

The Draft EIR and all of its appendices have been available for public review on the Department of City Planning's website since July 14, 2022. Potential impacts to historic resources are fully analyzed in Section IV.B, Cultural Resources, of the Draft EIR. As discussed therein, impacts would be less than significant.

Comment No. 459-2

The cultural historic monument designation of the CBS building was based on certain criteria, right? So what were those criteria? What impact will the planned building have and could the designation be jeopardized? Is the designation be reevaluated since they're going to change the complex and buildings so much? There are buildings on the property from the 1960s and 1970s. Why wouldn't they be considered part of the historic fabric?

Response to Comment No. 459-2

Potential impacts to historical resources from the proposed Project were analyzed in Section IV.B, Cultural Resources, of the Draft EIR and Historic Report (Appendix C.1 of the Draft EIR), and it was concluded that impacts to historical resources would be less than significant. The Draft EIR is available online on the Department of City Planning's website.

As discussed in Response to Comment No. 19-3, the historic analysis in the Draft EIR was based on the Conceptual Site Plan (Figure II-4 on page II-14 of the Draft EIR). Future changes in and around the HCM and Viewshed Restoration Area that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval,

including review by OHR and the Department of City Planning, as well as potential CEQA compliance review. The Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website for informational purposes prior to the release of this Final EIR. Please note that this draft is not final and has not been approved by City decision-makers. As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any substantial alteration to a designated HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

Comment No. 459-3

The cultural historic monument designation of the CBS building was based on certain criteria, right? So what were those criteria? What impact will the planned building have and could the designation be jeopardized? Is the designation be reevaluated since they're going to change the complex and buildings so much? There are buildings on the property from the 1960s and 1970s. Why wouldn't they be considered part of the historic fabric?

Response to Comment No. 459-3

The criteria for designating an HCM are discussed on pages IV.B-13 to IV.B-14 of Section IV.B, Cultural Resources, of the Draft EIR. As stated therein, the Cultural Heritage Ordinance (Sections 22.171 et seq. of the Los Angeles Administrative Code) established the criteria for designating an HCM. The Cultural Heritage Ordinance states that an HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature. A historical or cultural monument is any site, building, or structure of particular historical or cultural significance to the City of Los Angeles. A proposed resource may be eligible for designation if it meets at least one of the following criteria:

1. The proposed HCM is identified with important events of national, state, or local history or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city, or community is reflected or exemplified; or
2. The proposed HCM is associated with the lives of with historic personages important to national, state, city, or local history; or

3. The proposed HCM embodies the distinct characteristics of style, type, period, or method of construction, or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.¹⁶¹

As discussed in the HCM Findings (which are included in Appendix C of the Historic Report [Appendix C.1 of the Draft EIR]), CBS Television City met each of the HCM designation criteria.

The HCM designation, which was adopted by the Los Angeles City Council, would not be jeopardized or reevaluated. Refer to Section A, Existing Evaluation and Designation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-41 regarding the HCM designation, the period of significance, and why the 1969 Mill Addition and 1976 Support Building are not considered historical resources.

Comment No. 459-4

I read about a settlement between the LA conservancy and the developer. What is in this agreement? Are there limitations from this settlement? Why hasn't the settlement agreement been provided to the public? The LA conservancy doesn't speak for me and my concerns for historical preservation.

Response to Comment No. 459-4

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

¹⁶¹ City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

Comment Letter No. 460

Sabrina Rudolph
322 N. Harper Ave.
Los Angeles, CA 90048-2219

Comment No. 460-1

Are studios important employers here? Sure. We all know this is a vital industry for Los Angeles. However, [sic] I am concerned about how my area will take on all of the consequences of what is being proposed to expand the studio facilities at Television City because this is a major project, and one that does not fit in our neighborhood.

Response to Comment No. 460-1

This comment is identical to Comment No. 355-1, above; nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 460-2

First, the studio expansion will bring thousands of new employees driving thousands of cars. These workers won't all be from this area, and so my biggest question is, where will they all park? It seems like the studio's parking is already maxed out, and the EIR says that more than 5,000 new parking spaces are required. Where is that additional parking going to go? Is it going to spill into the neighborhood? And if they build these large parking structures, how will anyone get out of them during rush hour?

Response to Comment No. 460-2

This comment is identical to Comment No. 355-2. Refer to Response to Comment No. 355-2, above.

Comment No. 460-3

And what happens if there is an emergency during that time? How will emergency response vehicles be able to get to Cedars Sinai in an emergency? There is gridlock now that can keep an EMT vehicle stuck, not being able to get through bottlenecks in traffic. The application seems to minimize the problem so what assumptions were used in studying this issue?

Response to Comment No. 460-3

This comment is identical to Comment No. 355-3. Refer to Response to Comment No. 355-3, above.

Comment No. 460-4

The studios are in the business of promoting themselves and the movies and TV shows they make. What is the plan for billboards and advertising signage in the area? Will the planned signage be distracting? Will it block views? How large? We already have a lot signs in the area, and to me, it overly commercializes the area and cheapens the place where we live. Will there be a limit to the kinds, size and amount of signage to make sure it isn't splattered everywhere? It's Hollywood. They are in the business of "big, big and bigger!" How do we keep the signs from doing the same? Are there regulations to stop these billboards being lit up at night? Will video boards be allowed? Let's be real. These types of billboards are a blight on the community and use a huge amount of energy.

Response to Comment No. 460-4

With the exception of the last sentence, this comment is identical to Comment No. 408-4. Refer to Response to Comment No. 408-4, above.

The last sentence of this comment is identical to Comment No. 408-5. Refer to Response to Comment No. 408-5, above.

Comment No. 460-5

Finally, what is the studio doing to let people work from home and limit traffic and congestion? Zoom meetings work, and remote working should be factored into new large-scale employers coming into the area. Where is the study that looks at how many of the new employees can do some of those expected jobs remotely? How many staff could be impacted? People can collaborate over vast distances effectively, and don't need to commute across town to sit in an office and type on a computer.

What is the smallest footprint possible for the objectives of the development? Sure they need sound stages to make big action movies, loud ones at that, but do they need thousands of square feet of office space? Did anyone look at a different set of options that maybe only included the production facilities and not all the offices? What offices are actually going to be used and for what purposes?

Response to Comment No. 460-5

The first paragraph of this comment is identical to Comment No. 408-6. Refer to Response to Comment No. 408-6, above.

Refer to Section V, Alternatives, of the Draft EIR, for an analysis of alternatives to the Project, which includes a reduced density alternative (i.e., Alternative 3). Refer also to Topical Response No. 16, Project Alternatives Analysis, for a discussion of alternatives suggested during public comment. As discussed therein, while an EIR must describe a range of reasonable alternatives that avoid or reduce a project's significant impacts, it "need not consider every conceivable alternative to a project." (CEQA Guidelines Section 15126.6(a).) CEQA establishes no categorical legal imperative as to the scope of the alternatives to be analyzed in the EIR.

The remainder of this comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 460-6

This all seems like too much for my community to take in, especially since there have to be other viable options. Please listen to the community and take another look at whether this project is really necessary.

Response to Comment No. 460-6

This comment is identical to Comment No. 355-5. Refer to Response to Comment No. 355-5, above. Nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 461

Jane Ruhm
454 S. Mansfield Ave.
Los Angeles, CA 90036-3516

Comment No. 461-1

I live in Beverly Fairfax. I am writing to you today with a few questions regarding the Television City Project:

Response to Comment No. 461-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 461-2 through 461-5.

Comment No. 461-2

- Who can I get in contact with to receive the specific plan mentioned in the project's draft Environmental Impact Report? I would like the specific plan sent to me. I am confused about what exactly is being built, and I think the specific plan would help. Why would the specific plan mentioned not already be included in the draft Environmental Impact Report?

Response to Comment No. 461-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. As also discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment No. 461-3

- Where will the buildings in the height map be located? It's not clear how many of those buildings are being planned, please clarify? I'm concerned about 15–20

story buildings being so close to homes in the neighborhood. What are the risks while those tall buildings are being constructed? What will they be used for?

Response to Comment No. 461-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-16, 11-3, and 26-7 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, and the regulatory process under the proposed Specific Plan. As discussed therein, the Project includes height zone, setback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. These requirements are not currently required under the existing zoning code. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, setbacks, and frontage areas associated with the Project. Height Zone D, located in the central and southern portion of the Project Site, is the only height zone that allows a maximum height of 225 feet, and this maximum height is permitted at up to 40 percent of the Height Zone D area. The remaining height zones are more restrictive. Also note that the Draft EIR accounts for the building heights set forth in Figure II-5, Height Zone Map, of the Draft EIR.

Comment No. 461-4

- Once the building locations are finalized, will I receive an additional risk analysis if my home is nearby the buildings? Are there safeguards for the neighborhood homes and apartments?

Response to Comment No. 461-4

The potential for impacts to nearby buildings and uses is analyzed throughout Section IV, Environmental Impact Analysis, of the Draft EIR. Thus, an additional risk analysis is not required. With respect to building placement, refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan.

Comment No. 461-5

- Are there certain kinds of buildings or uses that would not be allowed as part of the development? For example, will any of the space be allowed to be used for some kind of cannabis business? What happens if they want to start using some of the space for a use that has not been analyzed or may not be compatible with the neighborhood?

Response to Comment No. 461-5

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 regarding the five permitted studio uses. As discussed in these

responses, based on comments received in response to the Draft EIR, the permitted uses were clarified to reflect the studio objective of the Project; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. A cannabis business would not be permitted.

Comment No. 461-6

Ultimately, I need these questions answered before I can fully form my opinion on the project. As it stands now, I don't support this project. The City and the developer have both failed to effectively communicate with the community, and that makes me feel very uneasy about the project's constructions and operations.

Response to Comment No. 461-6

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

The remainder of this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 462

Hayley Ruszecki
8250 W. Fourth St.
Los Angeles, CA 90048-4402

Comment No. 462-1

I'm writing about this new plan for the Television City studios.

Response to Comment No. 462-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 462-2

This new project should definitely not be allowed, and I will be particularly upset if it goes through, mainly because the whole thing has been sneaky and suspicious and the everyday common person who lives in the area has not been brought into the discussion at all. This makes me question the integrity of the people developing this project and even more sure this is something they are trying to get approved without most people ever knowing. Probably because they know we will not be happy with this change!

Response to Comment No. 462-2

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 462-3

From what I'm reading, this is going to be such a huge project that is very complicated. The documents pertaining to the changes are extremely long and very technical and detailed. No non-technical person like myself could even begin to understand the complexities of this. It would only make sense to me and the people in the neighborhood that the city would have a public meeting where we could learn what exactly this plan is and what they intend to happen. We should be able to have an open conversation and ask questions to understand the details, but nothing like this has been done at all. Once again, this just seems like it is because they are hiding something. No project should go through where the local residents are kept in the dark. What about transparency?? Why have there been so few opportunities for public input?

Response to Comment No. 462-3

This comment is similar to Comment No. 330-2. Refer to Response to Comment No. 330-2, above.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing, the extended public comment period, and future public hearings.

Comment No. 462-4

I know there are a few requirements for local outreach, but outside of that, I haven't seen or heard from anyone educating us on what this new development will be. No community meetings have been held. If the project applicant was truly concerned with being a good addition to the community and thought they had something beneficial to offer to the area, they would have a genuine interest in hearing feedback from residents in the surrounding neighborhoods. They would have no problem addressing our concerns because they would be able to do so easily, but they obviously do not have any interest in that. This is going to impact me! I should have people willing to listen to me as a stakeholder!

Response to Comment No. 462-4

Refer to Response to Comment Nos. 28-13 and 32-3 regarding the outreach conducted for the Project.

Comment No. 462-5

All in all, we need more information. And if we cannot have a lot more information and a public dialogue, then this new plan should in no way move forward.

Response to Comment No. 462-5

Refer to Response to Comment Nos. 28-13 and 32-3 regarding public outreach, noticing, the extended public comment period, and future public hearings.

Comment No. 462-6

Thank you for your attention to this matter.

Response to Comment No. 462-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 463

Moshe Ruttner
364 N. Formosa Ave.
Los Angeles, CA 90036-2527

Comment No. 463-1

I am a concerned resident of Beverly Fairfax. I would like to share my thoughts and concerns on the Television City project.

Response to Comment No. 463-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 463-3 through 463-5.

Comment No. 463-2

Specifically, I will outline my thoughts on how this project will hurt the chance for more affordable housing in my neighborhood.

Response to Comment No. 463-2

Refer to Response to Comment Nos. 463-3 through 463-5 below for a discussion of affordable housing.

Comment No. 463-3

It's no secret that LA lacks affordable housing. If the project developer says the project benefits the community, why doesn't it include housing—namely affordable housing? Why isn't the developer required to include affordable housing? Or housing of any kind?

Response to Comment No. 463-3

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of housing.

Comment No. 463-4

What is the rationale for building 1.4 million square feet that includes space for offices, especially when so many people plan to permanently work from home? What is the plan if

this office space sits empty? Where is the data or information that supports the need for this much office space? If that space isn't used for offices, will it be used for something else? For what other uses? The community should know in advance what else the buildings could be used for, if not for what is being proposed.

Where are the people who work in those offices going to live? Do you have a study that shows what the estimated number of employees is that will be commuting from other parts of LA and don't live nearby? Has a housing alternative been considered? Providing workforce housing could help with the insane housing costs and reduce how many miles are being driven, which are two of LA's biggest problems.

Response to Comment No. 463-4

Television City has been an operating studio within the Project Site since 1952 and will continue to operate as a studio upon completion of the Project. Specifically, as set forth on page II-10 of Section II, Project Description, of the Draft EIR, the underlying purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. See also Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan.

Refer to Topical Response No. 8, Vehicle Miles Traveled, for a discussion of the VMT by employees traveling to and from the Project Site.

The Draft EIR evaluated a residential project alternative; refer to pages V-91 to V-126 in Section V, Alternatives, of the Draft EIR. Given the mixed-use nature of this alternative, Alternative 4 would not meet the underlying purpose of the Project, which is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site. Alternative 4 would be less effective than the Project in meeting this purpose as a result of the reduced amount of studio-related uses.

The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 463-5

By going through with this project, the City of LA is demonstrating that it cares more about already well-off developers than it does about its ordinary taxpayer. Can you please be more specific about what the City means when it says its objective is to make the developer money?

Response to Comment No. 463-5

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 463-6

Ultimately, I don't want to live in a city that's only pay-to-play. I hope the City and the developer can find a way to make this project work for everyday people too.

Response to Comment No. 463-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 464

Rosanne Sachson
P.O. Box 5864
Beverly Hills, CA 90209-5864

Comment No. 464-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 464-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 465

Carole Sackley
6647 Drexel Ave.
Los Angeles, CA 90048-4208

Comment No. 465-1

As someone who lives and works in the Beverly Fairfax area, I am deeply concerned about the proposed expansion of the CBS studio lot.

Response to Comment No. 465-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 465-2 through 465-6.

Comment No. 465-2

There has been very little community involvement, and I think a lot of people in our neighborhood would want to know about this huge expansion.

Response to Comment No. 465-2

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 465-3

There have been no details given about the Specific Plan and I am worried that our community does not understand the full impacts of this project.

Response to Comment No. 465-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-12, and 9-15 with regard to the Project Description and proposed Specific Plan, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, how neither CEQA nor City policy requires a proposed specific plan ordinance to be included in an EIR, and the regulatory process under the proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the

environmental impacts of the Project. In addition, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment No. 465-4

I am most concerned about traffic and the lack of benefits it will bring to our neighborhood. We simply don't need any more traffic. How will this impact traffic during rush hour? I already sit in traffic for hours every day.

Response to Comment No. 465-4

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 465-5

How long will construction take? The DEIR says that the project could be built in one phase over 32 months, but it could extend until 2043? That's over 20 years of construction in our neighborhood.

Response to Comment No. 465-5

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 465-6

I don't want to live in a neighborhood that will be consumed by traffic Monday through Friday from 7AM until 9PM and all day on Saturday for the next 20 years. That is unacceptable. This is not even limited to off peak hours. This would include during rush hour every single day. Not to mention all the noise from construction. If the project takes the full 20 years, doesn't that mean we are subject to construction noise for the next two decades?

Response to Comment No. 465-6

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and

Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Refer to Response to Comment No. 26-138 regarding construction noise.

Comment No. 465-7

Please consider rejecting this project.

We have enough development already here in LA. We need more housing, not more offices.

And we definitely don't need more traffic or 20+ years of construction.

Response to Comment No. 465-7

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No 9-24 regarding the buildout timeline.

Comment Letter No. 466

Jan Sacks
8371 W. Fourth St.
Los Angeles, CA 90048-4202

Comment No. 466-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 466-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 466-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 466-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 466-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 466-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 466-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 466-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 466-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 466-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 466-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 466-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 466-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 466-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 467

Shara Sahota
329 N. Gardener St.
Los Angeles, CA 90036-5706

Comment No. 467-1

Air pollution in Los Angeles is already notorious, and this project will make it far worse for my community I moved into just last year. Has the air quality assessment considered the compound impacts of all of these pollutants? What about water pollution? What about the naturally-occurring gases that will be released?

Response to Comment No. 467-1

Please refer to Sections IV.A, Air Quality, IV.E, Greenhouse Gas Emissions, IV.I, Noise, and IV.K, Transportation, of the Draft EIR for an analysis of the Project's potential impacts, PDFs, and mitigation measures applicable to these environmental topics.

Table IV.A-1 (Ambient Air Quality Standards) on page IV.A-2 of the Draft EIR acknowledges that the Air Basin is non-attainment for ozone. Section 3.d in Section IV.A, Air Quality, of the Draft EIR analyzed localized operational air quality impacts resulting from Project emissions consistent with SCAQMD Localized Significance Threshold (LST) guidelines and considers NO_x, CO, PM₁₀ and PM_{2.5}. SCAQMD's LST guidelines do not provide significance thresholds for "compound impacts of all these pollutants" and no such analysis is applicable to the Project. As shown in Table IV.A-10 of the Draft EIR, Project localized operational emissions would not exceed SCAQMD significance thresholds, resulting in a less-than-significant impact. Thus, no sensitive receptors would be impacted by increased air emissions due to the operation of the Project. In response to SCAQMD comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, 16-85, and 26-78 regarding the Draft EIR's discussion of soil and groundwater contamination, including, among other things, the extent and source of contamination, under existing conditions and the proposed Project. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane and its mitigation.

Comment No. 467-2

I'm also very concerned about traffic, which is already a huge problem in Los Angeles. Having thousands of trucks and cars coming and going into our community will create even more traffic congestion. And it doesn't seem as though the parking will be remotely sufficient, considering the number of people who will driving into the area every single day. It's already hard to find parking in our neighborhood.

Response to Comment No. 467-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment Letter No. 468

Andrew Salazar
andrew@technicolorprinting.com

Comment No. 468-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 468-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 469

Dennis Salem
458 N. Curson Ave.
Los Angeles, CA 90036-2325

Comment No. 469-1

I am writing to voice my strong opposition to the proposed CBS building development in the Beverly Fairfax area. As a 13 year resident, I feel I speak for most of the residents who feel that this project will be hazardous, disruptive, and overall, a bad deal for neighbors and members of the community.

Response to Comment No. 469-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 469-2 through 469-4.

Comment No. 469-2

We have seen every time there is development of this magnitude, promises are made but are never kept. The applicant mentions many possible enhancements that could be made, but where are the specifics as to what the applicant has committed to doing? Please detail those improvements and enhancements. Will they be made just to the site? Or are any being promised in the actual surrounding neighborhood? What are those? When will they be made? What is the schedule the community can expect to see those done?

Response to Comment No. 469-2

This comment is identical to Comment No. 401-3. Refer to Response to Comment No. 401-3, above.

Comment No. 469-3

While the project is being constructed, we see are expecting large trucks driving through are neighborhood each morning and evening. What hours of the day and how many days a week will those trucks be allowed to enter and exit the site? Are there any kinds of trucks that will not be able to enter the site and have to park on the street, with a lane being closed as a result? Where is that expected to occur? There are some trucks, maybe those carrying large equipment, that will not be able to negotiate a turn from a lane into one of the

access driveways, so are those the trucks that will have to park in the street? How long will they be allowed to take up a lane?

Response to Comment No. 469-3

This comment is identical to Comment No. 123-2. Refer to Response to Comment No. 123-2, above.

Comment No. 469-4

Also, these trucks will create lots of noise and spew lots of exhaust. What are the thresholds for how much exhaust can be emitted? Will the trucks be gas or diesel? At a time when smog levels are on the rise, I can only imagine the added noxious fumes our kids and family members will have to breath. [sic] Will any of the trucks be carrying hazardous materials? What kind? What are the restrictions as to truck travel with hazardous materials in our neighborhood?

Response to Comment No. 469-4

This comment is identical to Comment No. 123-3. Please refer to Response to Comment No. 123-3, above.

Comment No. 469-5

Before, you rubber stamp this proposal, I strongly encourage you to listen the voices of those living here and to hear our needs. We cannot be disregarded in this matter.

Response to Comment No. 469-5

This comment is identical to Comment No. 123-4. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 469-2 through 469-4.

Comment Letter No. 470

Emily Sallack
347 N. Kilkea Ave.
Los Angeles, CA 90048-2226

Comment No. 470-1

I live in the Beverly Fairfax neighborhood, with my Husband and dog Berkley. I am very concerned about the proposed TVC 2050 plan. I have only just heard about this project, and I had to figure out where to learn more. The draft Environmental Impact Report is very technical and immense.

Response to Comment No. 470-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 470-2 through 470-6.

With respect to the complexity of the EIR, the Draft EIR and its technical appendices were prepared in accordance with the requirements of CEQA. The Draft EIR was written to be as accessible to the general public as possible. Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

Comment No. 470-2

But one of my issues is how affected we are by the constant noise. Obviously I live in an urban neighborhood, but construction and development always bring even more.

So I have questions and concerns and tried to read even a fraction of that report about noise. I couldn't understand much of it though.

Response to Comment No. 470-2

This comment, which does not raise specific issues about the noise analysis, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Section IV.I, Noise, of the Draft EIR provides a comprehensive analysis of potential noise impacts associated with construction and operation of the Project.

Comment No. 470-3

What exactly is a Mobility Hub? Where is the analysis that supports that our neighborhood even needs a Mobility Hub? Have actual residents asked that a Mobility Hub be located at that location and be part of updating the Television City property?

Response to Comment No. 470-3

Refer to Topical Response No. 7, Mobility Hub, and Response to Comment Nos. 26-160, 35-24, and 35-138 for a discussion of the Mobility Hub, which is a part of the Project's TDM Program and would help reduce single-occupant vehicle trips.

Comment No. 470-4

What is going to be the noise impact of that proposed Mobility Hub? It sounds like there could be tons of shuttles, buses, and cars going to and from it.

Response to Comment No. 470-4

Refer to Response to Comment No. 35-129 regarding the noise analysis associated with the Mobility Hub. As discussed therein, noise impacts associated with the Mobility Hub would be less than significant.

Comment No. 470-5

Will it operate in the evening or only during the day? How many vehicles are expected to use it? Will the number increase every year? How will that impact noise levels? What impacts will that have on the neighboring residences?

Response to Comment No. 470-5

The Mobility Hub would be the most active during the morning and afternoon peak commute hours when up to four shuttle buses would operate. Other hours of the day would see fewer buses operate to bring employees and visitors to/from the Metro D (Purple) Line Wilshire/Fairfax Station.

As discussed in Topical Response No. 7, Mobility Hub, the Mobility Hub would be open during the primary hours of operation for the Project itself.

Refer to Response to Comment No. 35-129 for a discussion of noise at the Mobility Hub.

Comment No. 470-6

What regulations will a Mobility Hub have to follow? Who enforces those rules? Is the city overseeing it? Will there be any sort of monitoring to ensure the Mobility Hub does not generate excessive noise impact from its bus and shuttle operation? The developer makes it sound like this is a really big thing, shouldn't there be more analysis about it?

Response to Comment No. 470-6

TVC would be responsible for the operation and the security of the Mobility Hub. Noise complaints from residents would be investigated by the City and violations of any applicable noise levels would require remediation on the part of the Project.

Comment No. 470-7

The neighborhood and community need to have answers to these kinds of questions to really understand what is being planned.

Response to Comment No. 470-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 470-2 through 470-6.

Comment Letter No. 471

Berta Sandberg
543 N. Martel Ave.
Los Angeles, CA 90036-1932

Comment No. 471-1

I live in the Beverly Fairfax neighborhood. I am quite concerned about this so called TVC2050 Project.

Response to Comment No. 471-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 471-2 through 471-5.

Comment No. 471-2

I say so called because who knows when this will be complete? Do you? Does the developer even know? They said it could be developed over 20 years! That's just ridiculous.

Response to Comment No. 471-2

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Comment No. 471-3

That's 20 years of trucks in our neighborhoods. I don't want to live in an area that will be inundated by thousands of trucks over the next two decades. That is also a lot of pollution that idling trucks will be spewing all over our community. Have you investigated the impacts on health that two decades of deiseal pollution would have on a community? This project is also right next to Pan Pacific Park. Did the EIR analyze the impact of pollution right next to the park? I would request that there be a study done in the impacts of long-term air pollution in our area.

Response to Comment No. 471-3

The Draft EIR comprehensively analyzed the Project's potential air quality impacts, including impacts from trucks and diesel emissions, in Section IV.A, Air Quality, and Appendix B of the Draft EIR in accordance with CEQA.

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding the number of construction trucks. Refer to Response to Comment No. 87-1 regarding emissions related to production trucks and Response to Comment No. 26-E.1-16 regarding the number of operational trucks. Refer to Response to Comment No. 126-2 regarding truck idling.

As discussed in Response to Comment No. 26-E.1-2, in response to comments on the Draft EIR, a quantitative HRA is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs, even after accounting for increased truck trips associated with construction and future operations, would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Please refer to Response to Comment No. 105-3 regarding the less-than-significant air quality impacts at the Pan Pacific Park, if considered hypothetically as a sensitive receptor.

Comment No. 471-4

This will also add a ton of noise pollution. Will all these trucks have an impact on our quality of life? Especially if they will be in our neighborhood for 20 years. Has there been an impact study on the noise and air pollution? There are a lot of children and schools in our neighborhood, and loud trucks could be very disruptive and dangerous for children who are still growing. Have the businesses, schools, synagogues, nursing homes, etc. been notified of these potential impacts? How will they be notified about air and noise pollutions studies are completed? Will more studies be done over time when construction has been taking place for years?

Response to Comment No. 471-4

Air quality and noise were comprehensively analyzed in the Draft EIR in accordance with CEQA and City policy. Refer to Section IV.A, Air Quality, and Section IV.I, Noise, respectively.

Please note that quality of life is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment No. 9-24 regarding the construction timeline.

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 471-5

Is the route that trucks will be taking confirmed? Why are these trucks going through the poorer neighborhoods? Are there different options? How will these routes be enforced? Receiving answers to all of these questions is absolutely imperative to understand how the residents of this community will be impacted by this project.

Response to Comment No. 471-5

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 107-2 and 124-6 regarding the haul routes.

Limiting the Project construction haul trucks to the use of the approved haul routes would be enforced by the LAPD and the California Highway Patrol.

Comment Letter No. 472

Hannah Sanders
327 N. Stanley Ave.
Los Angeles, CA 90036-2313

Comment No. 472-1

We need more detail provided in the EIR.

Response to Comment No. 472-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 472-2 through 472-4.

Comment No. 472-2

Only qualitative discussion is provided for the transportation impacts. This is great but serves no use if there isn't also a quantitative analysis to accompany it. The Vehicle Miles Travelled analysis is not making sense to me as it is providing many assumptions, but unreasonably so. Realistically how many people utilize public transportation in this area? We all know city commuters do not. Where do Television City employees live and what routes will they be using? The EIR is assuming they will be living close by, but how do we know this for sure?

Response to Comment No. 472-2

Refer to Section C, Assumptions in the VMT Analysis, Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 for a full discussion of the trip length and other assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

As revealed therein, the Transportation Assessment includes both the qualitative and quantitative analyses required of the EIR process.

Comment No. 472-3

Is the city really assuming that we will all take public transportation? What makes you think after a global pandemic, we would feel safe surrounded by this many people on a daily basis? Sure environmental standards would benefit from this, but what does this mean in terms of health and safety. Exactly how many people will be commuting to this area on a daily basis and how many will be carpooling? Taking the subway? The bus? Do we have enough public transportation resources for this 10,000+ surplus of people? What happens when events are being held and all of the parking and transportation means are used to their full capacity by residents?

Response to Comment No. 472-3

The Project is anticipated to attract 15 percent of its employees and less of its visitors via transit, bike and walk modes. Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

Table 15 on page 140 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the calculations of the number of people expected to take transit to/from the site. The assumptions indicate that approximately 134 people will travel to the Project Site in the morning and approximately 145 in the afternoon via transit, bike, and walking. Tables 4A and 4B on pages 58–59 of that document show that the current bus service to the Project Site current has almost 2,000 available seats in both the morning and afternoon peak hours, and these numbers do not count service to the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction. There is plenty of transit capacity available to accommodate the Project demand.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 472-4

In regards for lack of parking, what is the city planning on doing to add more? Are there any mitigation factors put in place to compensate for the lack of spots in regard to amount of people. Considering commercial loading zones will be occupying numerous existing meter spots, are visitors expected to park in our neighborhoods? This is simply unacceptable.

Response to Comment No. 472-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration, and thus mitigation is not required. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 472-5

We need a full numbers analysis of these issues. As city planners, your first concern is to be protecting the public interest. I do not feel like LA residents' health, safety or welfare is being prioritized at all. In order for the public to have full transparency, we need statistical evidence of the impacts this project will leave on our community. The future of LA relies heavily on the results Television City will bring. We need to know what to expect. Please give us more detail and show that every decision is well thought out in regards to us as citizens.

Response to Comment No. 472-5

Section IV, Environmental Impact Analysis, of the Draft EIR includes a detailed analysis of the Project's impacts during construction and operation in accordance with CEQA. This includes a quantitative analysis where appropriate.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 473

T. Sanders
323 S. Citrus Ave.
Los Angeles, CA 90036-3035

Comment No. 473-1

I am a resident of the Beverly Fairfax community, and there are many concerns that I have with this project—both small and large.

Response to Comment No. 473-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 473-2 through 473-5.

Comment No. 473-2

In a very general sense, I understand that the proposed project is supposed to be under construction for 20 years. Does this mean that my community is going to have to deal with loud and consistent noises for 20 years straight? Or, is most of the loud construction going to take place during the beginning phases of construction? If not, during what phases? What are the different phases of construction? And what should we expect during each phase of construction? By this I mean what should we expect in terms of noise levels, traffic levels, and other things that impact our daily lives.

Response to Comment No. 473-2

First, construction of the Project is not expected to take 20 years. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

With respect to noise, noise impacts by construction phase are provided in Section IV.I, Noise, of the Draft EIR. Refer to pages IV.I-35 through IV.I-43, specifically Table IV.I-10 on page IV.I-39, which provide noise levels at each receptor location by construction phase prior to mitigation. Noise levels after mitigation are provided in Table IV.I-19 on page IV.I-58 of the Draft EIR. As shown therein, impacts would be less than significant at all sensitive noise receptor locations with the exception of R1 with implementation of mitigation.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project.

With respect to "other things that impact our daily lives," this statement is too vague to provide an adequate response. The Draft EIR included a comprehensive analysis of all the topic areas required by Appendix G of the CEQA Guidelines.

Comment No. 473-3

What will be the sources of the noise during those phases? Please provide a detailed timeline of this project and everything that is expected during each time. I find it hard to believe that my community is going to have to deal with loud construction noise for 20 years straight, so please help me out and clarify this.

Response to Comment No. 473-3

The noise assumptions for each piece of construction equipment are provided in Table IV.I-9 of Section IV.I, Noise, of the Draft EIR, and the resulting noise levels at each receptor location are provided in Table IV.I-10 of the Draft EIR. Noise levels with mitigation measures included are provided in Table IV.I-19 of the Draft EIR. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 473-4

Another thing I am worried about relates to construction as well. The plan says that the project will extract groundwater for construction. How can you assure me that my property, as well as the property of my friends and family is not impacted by this groundwater extraction? Impacts to nearby properties are not made clear, so where is that study? Please provide precedent developments that are similar to this one in order to demonstrate the impact of groundwater extraction on nearby properties in both the short term and long term. Will the extraction cause subsidence? Please do not provide just a yes or no answer. Rather provide a detailed analysis so that we can be confident that our properties will not be impacted at all.

Response to Comment No. 473-4

Refer to Response to Comment Nos. 11-25, 16-74, 16-85, and 26-69 as well as the Dewatering Report (Appendix FEIR-13 of this Final EIR) with respect to dewatering as it relates to subsidence.

Comment No. 473-5

And lastly, why does the City care about any return on the developer's investment? Where is the basis for this in City planning or land use law? LA should care about its residents first and foremost, and that does not seem to be the case right now. How is the health and welfare of Fairfax residents being evaluated to ensure that this project does not impact residents negatively?

Response to Comment No. 473-5

Refer to Topical Response No. 4, Appropriateness of Economic Objective, regarding why this objective was included as part of the Project. As discussed therein, neither CEQA nor the CEQA Guidelines prohibit a public agency from adopting an economic or financial project objective. Refer also to Response to Comment No. 41-2.

Comment Letter No. 474

Patrick Sanderson
109 S. Kings Rd.
Los Angeles, CA 90036

Comment No. 474-1

I do not believe we have been provided with an adequate amount of information regarding the Television City project. I am very concerned about certain landmarks and how the project is going to affect their prosperity. It is making me extremely frustrated that historic sites are not seeming to be considered.

Response to Comment No. 474-1

Potential impacts to historical resources are fully analyzed in Section IV.B, Cultural Resources, of the Draft EIR. As discussed therein, impacts would be less than significant.

Comment No. 474-2

Audience and employee parking is going to create a huge problem for the Farmers Market. Where are customers supposed to park when these audience members displace parking? This is going to create a major inconvenience to the community members and will most likely drive away business.

Response to Comment No. 474-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Therefore, the Project would not displace The Original Farmers Market parking.

Comment No. 474-3

Also, all of the additional traffic delays and gridlock will likely keep customers from still wanting to visit there, how can that not be obvious? Why weren't those impacts made clear? What does this mean for farmers of California? What does it mean for families of LA? What does this mean for the merchants? Will their employees lose their jobs?

Response to Comment No. 474-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The remainder of this comment discusses non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 474-4

This would be a major loss for the city. The Farmers Market has been around for so long. It has brought such a unique culture and sense of community to LA and it is infuriating that city planners are doing nothing to protect it. The DEIR should analyze the potential deterioration and loss of Farmers Market. Where is that analysis if it has been done already and what impacts did it reveal?

Response to Comment No. 474-4

The Project would not result in any physical changes to The Original Farmers Market. In addition, the Draft EIR analyzed all potential environmental impacts to The Original Farmers Market; refer to Sections IV.B, Cultural Resources, and IV.I, Noise, of the Draft EIR. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Draft EIR's analysis of potential historic impacts to The Original Farmers Market.

Comment No. 474-5

Thousands of additional vehicles will be traveling through and near the historic district daily due to this project's density. This is going to absolutely tarnish the area and make it to where nobody visits or appreciates the district anymore.

Response to Comment No. 474-5

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-10 regarding increased vehicle trips and the Beverly Fairfax Historic District.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 474-6

Not only this, but the project also proposes a major change in the general plan for the area to Regional Center. What does it mean to our community to have the area be made a Regional Center? Why is the city considering allowing this? I can only image what major impacts this will have on the community. What further developments are going to take place in the area as a result? The Draft EIR needs to analyze the likely intensification of further development in the surrounding area as a result of this major change to the community plan.

Response to Comment No. 474-6

This comment is similar to Comment Nos. 11-29, 80-2, and 325-2, and the last sentence of the comment is identical to the last sentence in Comment No. 287-2. Refer to Response to Comment Nos. 11-29, 80-2, 287-2, and 325-2 regarding the proposed Regional Commercial designation. Refer to Response to Comment No. 26-177 regarding the Project's growth-inducing impacts.

Comment No. 474-7

As city planners, aren't you supposed to have the community members' best interest in mind? It does not seem that the public is being prioritized at all. Please provide us with a detailed analysis of the potential impacts that this project is going to have on LA.

Response to Comment No. 474-7

Section IV, Environmental Impact Analysis, of the Draft EIR includes a detailed analysis of the Project's impacts during construction and operation. The comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 475

Steven Sann
5551 W. Sixth St., Apt. 3224
Los Angeles, CA 90036-7511

Comment No. 475-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 475-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 476

Yasmin Sarikaye
653 S. Citrus Ave.
Los Angeles, CA 90036-3534

Comment No. 476-1

After reading the Draft Environmental Impact Report for the Television City project, I knew I had to speak up for my fellow Beverly Fairfax residents. I am deeply concerned about the impact of this project on my neighborhood, and I am even more worried about the lack of transparency from the developers.

Response to Comment No. 476-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 476-2 through 476-4.

Comment No. 476-2

Firstly, I find it strange that the developer has failed to include a definitive project phase timeline for residents. Has the developer outlined when each phase of the project will begin and end? How will we know when the project will reach its operational phase? The project could take up to 20 years to complete. This leaves a huge range of phases. How will we be notified when this phase and each phase is reached? What if our opinions on the project have changed? What happens when actual impacts are beginning to be experienced? Will the plan for the project then be revised?

Response to Comment No. 476-2

Refer to Response to Comment No. 9-24 regarding the Project timeline, and Appendix FEIR-8, Details of Buildout and Construction. There is no specific phasing plan for Project construction.

Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings and meetings.

The Project's potential impacts during both construction and operation are identified throughout the Draft EIR. Refer to Table I-1 of Section I, Executive Summary, of the Draft EIR, as well as each individual section in Section IV of the Draft EIR.

The proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 476-3

Additionally, I am concerned about the similarities this project shares with the Millennium Project. This project seems to be as opaque and confusing as the Millennium Project. The city is supposed to require Environmental Impact Reports to be specific and informative. Why is this EIR allowed to be so vague and unhelpful? What measures will the developer take to keep the public informed? Is the city even trying to prevent the same thing that happened with this project? What action steps are being taken?

Response to Comment No. 476-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13 with regard to the Project Description and proposed Specific Plan, which includes a discussion of the *Millennium* project EIR and associated legal case. As discussed therein, the *Millennium* case is not applicable to the Project, and the Project Description is distinguishable from the project description at issue in *Millennium*. Unlike *Millennium*, the Project is not seeking any flexibility with respect to the nature of the Project and what may be built, as the proposed studio uses and the overall size of the Project are defined and fixed elements of the Project. The Project would allow for limited flexibility in the size and placement of the permitted studio uses, as is typical with a studio specific plan.

Contrary to this comment, the Project Description is not vague. Rather, as explained in Topical Response No. 1, the Project Description is accurate, stable, and finite and provides sufficient details to fully evaluate the environmental impacts of the Project. Also refer to Response to Comment Nos. 5-3 and 9-13 and Topical Response No. 1 regarding how all of the physical parameters of the proposed Specific Plan are consistent with the Draft EIR.

As discussed in Response to Comment Nos. 28-13 and 32-3, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively

engaged with the community and shared information about the Project for several years. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Comment No. 476-4

Finally, I'm having trouble distinguishing between this project's design features and mitigation features. Why does the EIR not highlight the actual impact of the project's design features? Why are the mitigation features not added after the project design has been outlined? What additional tools will the developer provide that will help us understand the project's mitigation features?

Response to Comment No. 476-4

Refer to Response to Comment No. 9-34 regarding the inclusion of PDFs in the Draft EIR.

Comment No. 476-5

I am disappointed with the way the city has clearly not learned from the Millennium Project. The city still does not understand that we need to have a detailed outline of the project's phases and its mitigation measures. Until these issues are addressed correctly, I will not support this project.

Response to Comment No. 476-5

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13 for a discussion of the difference between this Project and the *Millennium* project. Additionally, all of the Project's mitigation measures are provided in Section I, Executive Summary, of the Draft EIR, as well as within each specific topic area. This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 477

Vicki Saugstad
vsaugstad@gmail.com

Comment No. 477-1

As a resident of Carthay Circle, I'm writing to voice my concern about the TVC 2050 project.

Response to Comment No. 477-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 477-2.

Comment No. 477-2

This proposed "Regional Center" designation is inappropriate and will add extreme congestion to the area.

Response to Comment No. 477-2

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 477-3

Please take more time to review the Draft EIR so the community can understand this massive project.

Response to Comment No. 477-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 478

Michael Sauk
5551 W. Sixth St., Apt. 3224
Los Angeles, CA 90036-7511

Comment No. 478-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 478-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 479

Michael Scarnechia
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 479-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 479-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 480

Stephen Schiffrin
2260 Timberlane Ct.
Oxnard, CA 93036-7716

Comment No. 480-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 480-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 481

Samuel Schneerson
364 N. Fuller Ave.
Los Angeles, CA 90036-2523

Comment No. 481-1

Please address my concerns with the proposed Television City construction project. As a resident of 10 years, my wife, Sima and I want to know what is potentially going to be built and how it will change our neighborhood.

Response to Comment No. 481-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 481-2 through 481-6.

Comment No. 481-2

The site is right in the middle of a neighborhood with schools, religious organizations, museums and Pan Pacific Park. How will the increased car and truck traffic for construction and then the increased traffic for employees in the enlarged Television City impact the health of residents? of the school children? And of visitors to the park? How will increased exhaust from diesel trucks negatively affect these people, particularly people at risk? What is the analysis of the impacts to the most at-risk populations such as children, people with asthma, seniors, and what were the conclusions? How many different at-risk groups live in this area? And how close are they to the project site?

Response to Comment No. 481-2

This comment is identical to Comment No. 127-4. Refer to Response to Comment No. 127-4, above.

Comment No. 481-3

Another impact that needs to be further explained in the EIR is noise from all those trucks and from the construction itself. During construction, how much increased sound will occur? and what will be the impacts of the different sources of noise to the residents 'and others 'hearing? If construction takes two decades or more, how much does that increase the impact on people's hearing? How much does it impact quality of life? Construction noise is annoying at best and harmful at worst.

Response to Comment No. 481-3

This comment is identical to Comment No. 127-5. Refer to Response to Comment No. 127-5, above.

Comment No. 481-4

The Adobe and Farmers Market are true community landmarks and important to the community. How will the expansion of Television City affect the Adobe? During construction, it seems they would be impacted by construction noise, dust, and debris, so what will those impacts be? How much blasting, drilling, and other construction activity will there be to impact it? Won't visitor to the Farmers Market be impacted by the noise, traffic and daily construction? What steps are being taken to ensure the increased traffic and people coming into the area does not displace regular customers and visitors?

Response to Comment No. 481-4

This comment is identical to Comment No. 214-4. Refer to Response to Comment No. 214-4, above.

Comment No. 481-5

I understand there will be power generators at the basecamps. Since generators often run on diesel fuel, how will the pollution, both air and noise, be handled? How often will the generators be used? What will they be used for? What about safety and hazard concerns?

Response to Comment No. 481-5

This comment is identical to Comment No. 214-5. Refer to Response to Comment No. 214-5, above.

Comment No. 481-6

It seems irresponsible given the housing crisis that this huge expansion would not include residential development.

Response to Comment No. 481-6

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, and the provision of with regard to housing.

Comment Letter No. 482

Gladys Schreiber
212 S. Formosa Ave.
Los Angeles, CA 90036-2814

Comment No. 482-1

As a resident of the area, I need more information. My neighbors and I are extremely concerned about the Television City project and the impacts that it will have in our community.

Response to Comment No. 482-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 482-2 through 482-5.

Comment No. 482-2

There are a bunch of different uses listed in the Draft EIR that are not included in the discussion of trips in the traffic section. What about the expected traffic from things like warehouses, theaters, educational uses, and conference facilities—where are the analyses about the extent of expected traffic and impacts of those possible uses? Clearly, warehouses would bring a lot of truck trips—not just trucks during construction but during operations, which the EIR says will bring no significant impacts. But how can that be stated when the definite uses are not named and analyzed? What about the emissions, air quality, and noise impacts from the different uses that could end up there? All of this needs to be analyzed fully so that the community understands the full range of possible effects.

Response to Comment No. 482-2

Refer to Topical Response No. 3, Permitted On-Site Uses. As discussed therein, uses allowed within the Project Site must be consistent with the five permitted land uses (i.e., sound stage, production support, production office, general office, and retail) and the ancillary sitewide uses that support the studio and the five permitted land uses. These uses are fully accounted for in the impact analyses in the EIR. Refer also to Response to Comment 5-6.

Air quality and noise analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, and Section IV.I, Noise, of the Draft EIR, respectively.

Comment No. 482-3

I also don't understand why the city thinks people are going to take transportation. I work in this area and everyone I know commutes in their cars alone. Is there any actual evidence that people at this project are going to ride transit? If actual data was not generated, then on what basis can those assumptions actually be made? What happens when this development is up and running and it turns out the assumptions were wrong, and that most workers and employees are driving to and from? And the impacts will then be much more significant than is being presented to the community? So what will the city do then?

Response to Comment No. 482-3

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM. The upcoming TDM Ordinance of the City of Los Angeles will require a monitoring program to measure the continuing effectiveness of the Project's TDM Program. If the TDM Program is not meeting its goals, additional TDM strategies will have to be implemented until the Project meets the effectiveness levels discussed in the Draft EIR.

Comment No. 482-4

The EIR states that that an average employee only commutes 6.7 miles per day. But this information is buried on page 75 of the 83 page traffic section. Please provide evidence for this commute mileage, as it is not realistic. From what I understand, the construction is also going to lead to a loss of crosswalks, sidewalks and bike lanes. How is this prioritizing the public's safety at all? Which crosswalks, sidewalks and bike lanes are going to be affected? Will they be affected all at the same time or part of construction phases? How is the community supposed to know what to expect? What measures will be taken to ensure pedestrian safety?

Response to Comment No. 482-4

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Regarding crosswalks, sidewalks, and bike lanes, refer to Response to Comment No. 370-6. The Project driveways would be designed to minimize vehicle conflicts with other vehicles, pedestrians, and bicyclists and provide safer pedestrian crossings through pedestrian signal phasing and continental crosswalks. Refer to Topical Response No. 12, Safety and Congestion.

Comment No. 482-5

In terms of the environment, what are going to be the expected air pollution effects? When will those effects be felt and where in the neighborhood? The carbon monoxide levels are higher than 50% already and I am very concerned about what this means for myself and for my family. Please provide a health risk analysis on the impacts to my community.

Response to Comment No. 482-5

Refer to Section IV.A, Air Quality, of the Draft EIR for a comprehensive analysis of the Project's potential air quality impacts. As discussed on page IV.A-71 in Section IV.A, Air Quality, of the Draft EIR, off-site vehicle trips associated with the Project would not approach screening levels in which localized CO levels might exceed the 1-hour CO ambient concentration standards or result in health effects. Nonetheless, as discussed in Response to Comment No. 26-E.1-2, in response to SCAQMD comments on the Draft EIR, a quantitative HRA has been prepared and is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

Comment No. 482-6

The community deserves answers and we will not stand for anything less.

Response to Comment No. 482-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 482-2 through 482-5.

Comment Letter No. 483

Sallo Schreiber
212 S. Formosa Ave.
Los Angeles, CA 90036-2814

Comment No. 483-1

I am writing to express my concerns about many aspects of this proposed plan for Television City. These concerns demand major reconsideration of this project.

Response to Comment No. 483-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 483-2 through 483-4.

Comment No. 483-2

To start, what is the route that trucks will take while traveling to the project site and then when moving away demolition, debris and dirt from the project site? Why have routes not been confirmed? Will the routes vary depending upon the day and time of day? What if an accident shuts down one of the routes or causes a long delay? Will the trucks take different detours then? I think that this is crucial and it must be clarified.

Response to Comment No. 483-2

This comment is identical to Comment No. 164-2. Refer to Response to Comment No. 164-2, above.

Comment No. 483-3

How much demolition debris and dirt is expected, on a weekly basis? What are previous studies on environmental impacts of debris and dirt on nearby properties? What about studies on the health impacts of debris and dirt on nearby residents? Why are there different options for the trucks? How is it determined which trucks get which options? Are these trucks going to line up and be idling outside of my house choking me and my children with exhaust? Even if you do clarify the truck routes, how are they going to be enforced? Will it be the local authorities, or are you hiring people to do it? Please answer the questions above in enough detail for anyone to have a clear understanding of your plan and potential impacts in might have on our environment, and more importantly, health.

Response to Comment No. 483-3

This comment is identical to Comment No. 164-3. Please refer to Response to Comment No. 164-3, above.

Comment No. 483-4

Similarly, what are the working hours and under what timeline is this project going to take place? I'd imagine that with demolition debris and dirt, there must be loud things that are going to occur. How will this noise not going to [sic] make it unbearable to live in the neighborhood? Can you assure the neighborhood of that? Specifically, how loud do you expect these actions to be? Will anything take place during the nighttime, making it harder for me to put my children to bed? Are we going to be woken up early in the morning with the sound of loud explosions?

Response to Comment No. 483-4

This comment is identical to Comment No 164-4. Refer to Response to Comment No. 164-4, above.

Comment No. 483-5

I feel entitled to a thorough response to all of the above. These are questions that directly relate to the quality of life of Beverly Fairfax residents, and it is important to consider that! Please answer the above and include any additional detail that you think is important for us to have a better understanding.

Response to Comment No. 483-5

This comment is identical to Comment No. 164-5. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 483-2 through 483-4.

Comment Letter No. 484

Brian Schroeder
brianschroeder10@gmail.com

Comment No. 484-1

I wholeheartedly support the TVC 2050 plan. I believe the renovation of that property will create jobs in the television industry and increase the prestige of the Los Angeles entertainment industry.

Response to Comment No. 484-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 485

Devorah Schwalb
351 N. Poinsettia Pl.
Los Angeles, CA 90036-2506

Comment No. 485-1

I have concerns I'd like to share with your department about the project being considered, TVC 2050. This project will bring many impacts to the community that need to be fully explained to residents and businesses—the people who live and work here every day.

Response to Comment No. 485-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 485-2.

Comment No. 485-2

Anyone who has been to the area around the CBS property is very familiar with the traffic and parking issues. Parking in nearby streets is already a problem. It is not enough for the developer of the project to say that parking won't be a problem or that no one will be able to park on our neighborhood streets. The EIR that was released mentions temporary off-street parking. What is that referring to? Where would that temporary parking be? For what periods of time? Would it be throughout construction and during operations? And what would the off-site parking be for?

The EIR refers to a parking agreement, but why aren't the details of that parking agreement part of this approval process? That makes it sound like the parking agreement would be worked out later, but then how will residents and businesses be a part of those terms and conditions? How will they be able to provide input if it doesn't get decided until later?

It already seems that between the number of people who will be working in the new development and the number of people they expect to visit, there won't be enough parking. How will that additional need for parking be handled? Please provide more details about what is planned? Who will be able to park in the parking structure? What will happen when the parking structure is full? I'm sure you can understand why residents and businesses would be concerned about so many specifics not being spelled out before the city maybe approving this project.

I would appreciate you addressing these concerns and questions.

Response to Comment No. 485-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

With respect to parking during construction, the Project includes a CTMP pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 to IV.K-37 of the Draft EIR), which would include a prohibition of construction worker or equipment parking off-site.

Comment Letter No. 486

Bayla Schwazmer
155 N. Detroit St.
Los Angeles, CA 90036-2915

Comment No. 486-1

I am writing to address a major concern I have with the Television Center development and the Draft Environment Impact Report that was released. First, I find the EIR to be very confusing and lack a lot of detail throughout most of the document. It seems as if it was left open ended on purpose. The specifics areas that I would like to receive much more information on is how this project will impact the Cedars hospital and the changes in the look of the community.

Response to Comment No. 486-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 486-2 and 486-3.

Comment No. 486-2

This development will require an abnormal amount of large trucks and heavy machinery move around the area. This undoubtedly will create much more traffic than Beverly Fairfax normally has. This will likely decrease the response of emergency vehicles and how needy patients can access the hospital. Imagine an ambulance trying to weave in and out of massive semi-trucks in stand-still traffic trying to get to the hospital. Are there going to be a large amount of lane closures to accommodate the construction vehicles? Are there going to be traffic guards directing backups of vehicles? How will you conduct an analysis that studies how projects, that are like this one, have impacted hospitals that are in close proximity?

Response to Comment No. 486-2

Refer to Section D, Emergency Access, of Topical Response No. 12, Safety and Congestion, for information regarding emergency response times. As described therein, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by

driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

The Project Site is large enough to allow the haul truck staging and construction worker parking to be confined to the Project Site itself. The construction program does not anticipate long closures of travel lanes adjacent to the Project Site.

As required by the CTMP prepared pursuant to Project Design Feature TR-PDF-1, traffic control personnel and flag personnel would be used, if necessary, to assist construction trucks in and out of the Project Site and in the event of any truck maneuvers that involved backing up.

Comment No. 486-3

A development of this size will drastically alter the look of the community and nearby neighborhoods. This is concerning because of the significance of the buildings around it. First is the CBS building. This iconic building has been a part of the community since 1952. How will pedestrians be able to see the CBS building with the new building being built in this location? Along with altering the view of the CBS building, it will also alter overall aesthetics of the single-family homes and apartment buildings in the immediate proximity. The entire feel or look of the community will be drastically altered if 58-foot buildings would be built surrounding them. Has the community been asked about their opinion on these dramatic changes? Has the difference in the view of the area been analyzed or predicted?

Response to Comment No. 486-3

Refer to Response to Comment Nos. 5-13, 5-14, 11-3, 26-7, and 209-3 regarding the size of the Project.

Refer to Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the preservation of the Primary Studio Complex.

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-45 regarding the regulations and procedures for new construction in the Viewshed Restoration Area and restoration of the historic viewshed along Beverly Boulevard. As discussed therein, the 58-foot height limit in the Viewshed Restoration Area, which is approximately two-thirds of the 88-foot height of the existing Primary Studio Complex, is taken directly from the HCM Findings. In addition to the 58-foot height limit, any development in the Viewshed Restoration Area would be required by the HCM Findings to

restore the currently obstructed character-defining viewshed features of the Primary Studio Complex as seen from adjacent public areas along Beverly Boulevard. Further, development in the Viewshed Restoration Area greater than one story in height would require a Project Compliance approval pursuant to LAMC Section 11.5.7[13B.4.2], which is a discretionary approval that would require CEQA compliance review.

The Draft EIR fully evaluated potential impacts to the Primary Studio Complex and historical resources in the Project Site vicinity and concluded that impacts would be less than significant. Detailed discussions of the analyses are provided in Sections D, Analysis of Impacts to the Primary Studio Complex, and E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources.

This comment incorrectly conflates aesthetic and historic impacts. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-8 regarding the different criteria and thresholds for aesthetic and historic impacts.

Following the publication of this Final EIR, the Project will be considered during several public hearings and meetings before City decision-makers prior to any approval.

Comment No. 486-4

These concerns to be addressed. Much more adequate analysis needs to be done before this project can be allowed to begin. The lack of detail in and ambiguity of this initial EIR is not acceptable.

Response to Comment No. 486-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 486-2 and 486-3.

Comment Letter No. 487

Tuvia Schwarzmer
155 N. Detroit St.
Los Angeles, CA 90036-2915

Comment No. 487-1

I am concerned about several things in the EIR for the studio project at the CBS building that need additional explanation.

Response to Comment No. 487-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 487-2 through 487-5.

Comment No. 487-2

1. Why does the City care how much money the developer?[sic] Why would this be an objective that is included in a review and assessment of impacts to the community and to the area of the project? The City should be caring about the lives and welfare of its residents, not whether some developer's investments achieve their anticipated return. What is the amount of this return? The EIR seems to reject alternatives because the developer doesn't come out AS far ahead financially. We need to know what the financials underlying this objective are. How is it determined that major impacts of a project, like are expected from this project, are outweighed by factors that could include how much of a return the developer gets? Where is that in city or state law?

Response to Comment No. 487-2

This comment is identical to Comment No. 356-2, with the exception of the first sentence. Refer to Response to Comment No. 356-2, above.

Comment No. 487-3

2. Where are all these people going to park? The EIR states more than 5,000 parking spaces are required for the influx of people, but then says that the parking spaces may be offsite. And the number of people expected is greater than the number of parking spaces being planned. Will that spill over into my neighborhood? What streets is the parking expected to spill over onto? If the

parking is offsite, what are the noise impacts, the safety issues from people speeding in the community, the pedestrian impacts, and other impacts of off-site parking? If this is going to require the taking of road spaces in front of people's homes, shouldn't that be accounted for? These impacts need to be analyzed.

Response to Comment No. 487-3

This comment is identical to Comment No. 356-3. Refer to Response to Comment No. 356-3, above.

Comment No. 487-4

3. How do we know people may come in on public transit? How was it estimated who would take public transit? Which forms of public transit? I work and live in this area, and almost everybody drives to get to and from places. Is there evidence that people at this project will ride transit? How many cars are expected to be added to our streets? Not how many miles they're expected to commute, but actually cars on a daily basis?

Response to Comment No. 487-4

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM. The upcoming update to the TDM Ordinance of the City of Los Angeles will require a monitoring program to measure the continuing effectiveness of the Project's TDM Program. If the TDM Program is not meeting its goals, additional TDM strategies would have to be implemented until the Project meets the effectiveness levels discussed in the Draft EIR.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 487-5

4. Who ultimately is responsible for ensuring that the community and surrounding neighborhoods are not left irreparably harmed and changed by this massive development being proposed? The neighborhood didn't ask for this, and most of my neighbors don't want it. It would be something that was done to us—not to benefit us, not for us. How can a development be forced upon a community when it may well not be the right development for a location?

A lot of people guarantee a lot of things, but accountability is more important to see that it's done. Please let me know what this accountability will look like.

Response to Comment No. 487-5

This comment is identical to Comment Nos. 356-4 and 356-5. Refer to Response to Comment Nos. 356-4 and 356-5, above.

Comment Letter No. 488

Jake Seevers
1843 S. Eighth St.
Alhambra, CA 90021-2440

Comment No. 488-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable Industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 488-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 489

Sussy Selbot
465 N. Curson Ave., Apt. 105
Los Angeles, CA 90036-2323

Comment No. 489-1

I'm writing to discuss the DEIR for the Television Studios project.

Response to Comment No. 489-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 489-2

I would like to know why the specific plan was not included in the DIER? [sic] This seems like a super important document to be left out of the DEIR. Will the DEIR be sent back out for review once it includes the specific plan? If so, what is your plan and timeline for recirculating the specific plan? There are far too many possible things that could be developed, so isn't a specific plan supposed to spell out those details. How are we in the public and community supposed to give input to a plan that is so broad and open-ended?

Response to Comment No. 489-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan and the regulatory process under the proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. As also discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

With regard to recirculation, this comment does not provide substantial evidence to demonstrate that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been presented or added to the Draft EIR. Thus, recirculation is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 489-3

Where will the buildings actually be located and how big and how tall will they be? Why would the developer of the project still be figuring that out? The DEIR says the plan is just conceptual, but how are we supposed to comment on the project if everything is just conceptual?

Response to Comment No. 489-3

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, and 9-12 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR and the regulatory process under the proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. As discussed in Topical Response No. 1 and Response to Comment Nos. 9-16, 11-3, and 26-7, the Project includes height zone, setback, and frontage area requirements that will dictate the placement, mass, and height of future buildings. These requirements are not currently required under the existing zoning code. Refer to pages II-17 through II-21 in Section II, Project Description, of the Draft EIR for information regarding height zones, setbacks, and frontage areas associated with the Project.

Comment No. 489-4

What is the difference between what are project design features and what is referred to as mitigation measures? Will the community get a clear understanding of the real impacts before this project begins? What happens if project design features change?

Response to Comment No. 489-4

Refer to Response to Comment No. 9-34 regarding the difference between PDFs and Mitigation Measures, and how they will be enforced.

Comment No. 489-5

I also would like to know more the difference between production offices and general offices. Is it possible that the entire project will just become offices or is there a requirement that production continue on the site? What guarantees that the developer won't make the entire project an office project? Is there a limit on how many offices can be put in? Doesn't the developer have to show the need for the different uses, including why so many offices are needed when so many people work remotely now?

Response to Comment No. 489-5

Refer to Response to Comment No. 489-3 regarding the Project Description and Specific Plan.

Television City has been operating as a studio since 1952 and will continue to operate as a studio upon completion of the Project. With regard to the difference between production office and general office uses, refer to Response to Comment No. 26-122, which discusses the definitions of the permitted uses in the proposed Specific Plan. Also refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment Nos. 5-6 and 26-14. The approval of the Specific Plan would ensure that, consistent with the proposed development program in the Draft EIR, production office and general office would be limited to a maximum of 700,000 square feet of floor area each. Refer also to Response to Comment No. 5-15 regarding the underlying purpose of the Project. As discussed therein, the underlying purpose of the Project is to continue the studio use on the Project Site. The Project would not consist of only office uses. Refer to Response to Comment Nos. 9-13 and 26-16 regarding the mix of studio uses required for a modern studio campus.

The comment regarding the need of office and remote workers does not concern CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 489-6

Thank you for your time and consideration of these questions.

Response to Comment No. 489-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 489-2 through 489-5.

Comment Letter No. 490

Richard J. Serino
serinoconst@aol.com

Comment No. 490-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 490-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 491

Mina Seroosh
330 N. Edinburg Ave.
Los Angeles, CA 90048-2302

Comment No. 491-1

My concerns mostly lie with traffic and parking. Why is most of the parking located on Grove Drive? There is no way this many cars can use Grove Drive and gridlock is certain. Please show an alternative with parking distributed around the property.

Response to Comment No. 491-1

This comment is similar to Comment Nos. 316-1 through 316-3. Refer to Response to Comment Nos. 316-1 through 316-3, above. As described in those responses, the parking supply is indeed distributed across the Project Site, and accessible to the signalized entrances on all three sides of the Project Site.

Comment No. 491-2

Also, Grove Drive is right across from Pan Pacific Park. Did the EIR consider the health risks to children and senior from all the trucks that will be entering Grove Drive and emitting diesel exhaust next to a park? How is this allowed?

Response to Comment No. 491-2

Refer to Response to Comment No. 105-3 regarding the less-than-significant air quality impacts at the Pan Pacific Park, if considered hypothetically as a sensitive receptor.

Comment Letter No. 492

Lisa Serratos
328 N. Orange Grove Ave.
Los Angeles, CA 90048

Comment No. 492-1

Besides the thousands of cars and trucks that will be entering our community every day are the “special events” can be held on the property that will add even more traffic and parking issues for our community.

Did the City specify or limit what kind of special events will be allowed? What days of the week and what hours? How many times a year? How many people will be permitted to attend these special events? What prevents outdoor gathering include concerts and dances with loud music? What equipment and set-up and break-down will be required for the events and when will that occur?

Response to Comment No. 492-1

Special events would not be regulated by the proposed Specific Plan, do not regularly occur on-site, and would be subject to existing City permitting regulations.

Refer also to Section C, Special Events, of Topical Response No. 10, Trip Generation, for further discussion of special events on the Project Site.

Comment No. 492-2

It seems to me that the community is being asked to put up with constant noise and disruption forever.

Response to Comment No. 492-2

This comment does not raise any specific issue with the noise analysis. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 493

Chadaphea Sethik
7941 1/2 Blackburn Ave.
Los Angeles, CA 90048-4417

Comment No. 493-1

The new Television City project, or TVC 2050, poses many concerns regarding our children, schools, and community. There are multiple schools, prominent businesses, and national landmarks within a close radius of the project. These places deserve to keep operating at a standard, uninterrupted level. They should not suffer any adverse impacts from the TVC 2050 project and that should be a guarantee from the company.

Response to Comment No. 493-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 493-2 through 493-6.

Comment No. 493-2

On the already busy Beverly Blvd and Fairfax Ave, how will a new development impact traffic?

Response to Comment No. 493-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 493-3

Will an ambulance make it to our schools for emergencies or will they be gridlocked in traffic?

Response to Comment No. 493-3

Refer to Topical Response No. 12, Safety and Congestion, for information regarding emergency response times. As described therein, the Project would not increase the

number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Comment No. 493-4

Will the construction from this project affect surrounding businesses with noise, dust, vibration, and other impacts?

Response to Comment No. 493-4

Businesses, with the exception of lodging facilities, are generally not considered noise sensitive receptors under CEQA. Refer to Section IV.I, Noise, of the Draft EIR for a detailed analysis of noise and vibration impacts at nearby sensitive receptors during construction of the Project.

Refer to Sections IV.A, Air Quality, and IV.I, Noise, of the Draft EIR. As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, the SCAQMD Rule 403—Fugitive Dust, would require the use of BACT for dust control, which includes mandatory control actions and dust control contingency measures. As shown in Table IV.A-11 in Section IV.A, Air Quality, of the Draft EIR, localized construction impacts after the application of applicable mitigation would be less than significant for the 25-meter receptor range. Thus, all receptors accounted for in that range and all receptors farther from the Project Site than that range (e.g., surrounding businesses) would also be expected to experience less-than-significant localized air quality impacts.

Comment No. 493-5

Will patrons, visitors, and tourists be able, and willing, to navigate the surrounding neighborhoods, the traffic, and construction detours?

Response to Comment No. 493-5

See Response to Comment No. 493-2 for a discussion of the overall performance of the roadway system after the completion of the Project. Patrons, visitors, and tourists will still be able to navigate along the streets serving the area.

The Project Site is large enough to allow the haul truck staging and construction worker parking to be confined to the Project Site itself. Substantial lane closures and construction detours are not necessary for the construction of this Project.

Comment No. 493-6

Will this multiyear project result in local businesses closing because of its impacts?

We want answers. TRUTHFUL answers and¹ not flowery responses about how great the project is going to be and how much economic benefit it will have for employees and the community.

Any potential cost to the community must be known too. Businesses could be impacted if their customers no longer come because it takes too long to drive there. Visitors to the area could decide that the traffic has gotten so bad, they will pass on coming to our local stores, businesses, and attractions. Many employees may not live in or nearby, so they would be leaving the community to commute to wherever they live. These are impacts that also must be taken into consideration, especially if there are adverse economic impacts

Response to Comment No. 493-6

Economic impacts in and of themselves are not CEQA issues. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment” (14 CCR 15131). Substantial evidence must be provided to demonstrate a reasonably foreseeable physical impact on the environment from the economic or social change, and no such evidence is provided in this comment. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 494

Mona Shaikh
934 N. Genesse [sic] Ave.
West Hollywood, CA 90046-7346

Comment No. 494-1

I am a resident of the community that will be impacted by the proposed Television City project. I have lived here for 10 years.

Response to Comment No. 494-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 494-2 through 494-4.

Comment No. 494-2

I am concerned that my daily life will be very disrupted with the chaotic nature of parking issues. After reading the Draft EIR, the parking plan as it stands makes no sense to me, and I want more clarity.

In the draft, it says that there will be around 8,000 employees on the project site. Furthermore, because this project involves a number of audience stages being built, it is said that anywhere between 3,000 to 5,000 audience people a day could be going to the site. This means that on any given day, there could be between 11,000 and 13,000 people going to the site. That is a lot of people and a lot of cars, which requires a lot of parking.

However, the draft states that the project will only have 5,300 parking spaces. On a slow day for the site, this is not even close to nearly enough parking spaces!

What analysis led you to proposing 5,300 parking spaces? I am genuinely curious because the numbers simply do not match up. What plans do you have in mind to make parking work? Where will parking be that doesn't fit into the parking structure referred to? Where is the overflow going to park? Who is going to have parking priority? How much is parking going to cost? Will the public be able to use the parking structure or only employees and official visitors? How are you going to handle inevitable parking disputes given that so many people will be fighting for limited spots? If someone cannot get a space in the parking garage, that person will need to exit and drive around looking for parking, right? Seems they will be competing for the limited on-street parking, isn't that right?

Response to Comment No. 494-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. Project parking would not be open to the general public.

The comment regarding the number of audience visitors is incorrect. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 494-3

A major concern of mine is that the overflow parking is going to park around our community and flood us with cars. Why does the plan try to suggest this will not be the case? What are the plans for the overflow? What are the specific plans? How can we be sure that our neighborhood is not going to become one massive parking lot?

Response to Comment No. 494-3

Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 494-4

The parking numbers as they stand make absolutely no sense. Please revise your plans and answer the questions above so that there is enough parking to accommodate all of the new people that will be going to the site. The parking plan as it stands should be enough of a reason to deny the project right now.

Response to Comment No. 494-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment Letter No. 495

Louise Shane
171 N. Fuller Ave.
Los Angeles, CA 90036-2811

Comment No. 495-1

I ask that you take a closer look at the impact on air quality that the new studio at Television [sic] would create if constructed. The air with breath [sic] around Los Angeles is already intoxicating and if there is a significant increase in carbon and pollutants from the traffic and construction of the project, we could be in for even more hazardous air.

Response to Comment No. 495-1

This comment is identical to a portion of Comment No. 335-1. Refer to Response to Comment No. 335-1, above.

Comment No. 495-2

Does the air quality analysis show that there could be 50, 100, or 200 production trucks spewing diesel particulates in the community for years to come? What exactly will be emitted? During what hours and over how many days?

Response to Comment No. 495-2

This comment is identical to a portion of Comment No. 335-1. Refer to Response to Comment No. 335-1, above.

Comment No. 495-3

What about the greenhouse gas emissions from all these trucks?

Response to Comment No. 495-3

This comment is identical to a portion of Comment No. 335-1. Please refer to Response to Comment No. 335-1, above.

Comment No. 495-4

What are the specific effects expected from each of the types of particulate matter?

Response to Comment No. 495-4

This comment is identical to a portion of Comment No. 335-1. Refer to Response to Comment No. 335-1, above.

Comment No. 495-5

What can the developer possibly do to mitigate the health impacts of the worsening air quality due to this project? Other than not allowing the size, the amount of expected people, the volume of cars and trucks?

Response to Comment No. 495-5

This comment is identical to a portion of Comment No. 335-2. Refer to Response to Comment No. 335-2, above.

Comment No. 495-6

Will the developer reduce the scale and density of what is being planned given the already poor air quality in Los Angeles?

Response to Comment No. 495-6

This comment is identical to a portion of Comment No. 335-2. Refer to Response to Comment No. 335-2, above.

Comment No. 495-7

Also, I ask you consider the health risks to children and senior [sic] from all the trucks that will be entering Grove Dr and emitting diesel exhaust next to a park—where is the breakdown of the emissions just due to those trips in that location? Why is the large parking structure being placed on Grove Drive, which is a small street, and right across from Pan Pacific Park? Think of the children that will have to breath [sic] dirty air from the pollution from all these trucks.

Response to Comment No. 495-7

This comment is identical to Comment No. 335-3. Refer to Response to Comment No. 335-3, above.

Comment No. 495-8

As both a resident and concerned citizen, I humbly ask for you to consider these risks and pass these questions to the developer.

Response to Comment No. 495-8

This comment is identical to Comment No. 335-4. However, this comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 495-1 through 495-7.

Comment Letter No. 496

Jerry and Evelyn Shapiro

Comment No. 496-1

I am writing to comment on the CBS Television City expansion.

Response to Comment No. 496-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 496-2

I would love to provide feedback on the project, but the draft EIR says the plan is still conceptual and the applicant would be given flexibility. My understanding is this is why the applicant is asking for a 20-year development agreement. I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

When will the detailed plan be provided? When will the community be allowed to give public input and weigh in on the actual design, not a plan that says things like the company "may make improvements" or could be two decades of construction?

Response to Comment No. 496-2

This comment is identical to the first and second paragraphs of Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment No. 496-3

Not to mention the traffic and parking issues.

Response to Comment No. 496-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and the adequacy of parking supply are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment. Refer to Topical Response No. 13,

Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 496-4

How much further will the project progress before we are provided the detailed information we deserve?

Response to Comment No. 496-4

This comment is identical to the third paragraph of Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment Letter No. 497

Leonard Shapiro

Comment No. 497-1

I live next to this proposed project, and I am really worried about parking. Our neighborhood is already full with people parking when the nearby shopping parking lots, meters, and businesses have no parking available. It's already frustrating enough not being able to park in my own neighborhood.

From what I understand this project would add 6,000 more employees. That's 6,000 people commuting every day to work. Plus, all of the different kinds of trucks for construction! Why does the DEIR say the project will have 5,300 parking spaces when there could be 6,000 cars. Where will the overflow go?

Response to Comment No. 497-1

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 497-2

The DEIR says that the average employee only commutes 6.7 miles a day. This doesn't seem right. Where did this data come from? How can the applicant already know where the new employees will be coming from to get to and from work there?

Response to Comment No. 497-2

A full discussion of the trip length and other assumptions that went into the VMT analysis is found in Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment No. 26-156.

Comment No. 497-3

Has the city considered the additional traffic during events? What about when there is a live audience during filming? Have they considered all the additional people that will bring?

Response to Comment No. 497-3

The Transportation Assessment (Appendix M.1 of the Draft EIR) accounted for event and audience trips. Refer to Topical Response No. 10, Trip Generation, for a discussion of the Project's trip generation.

Comment No. 497-4

I see people parking on my street all the time to go to the farmers market and the Grove. I'm sure this will bring even more traffic. People always use our streets when they don't want to pay for parking. The plan does not provide actual solutions to what all of us who live here know the actual consequences if the project gets built.

Response to Comment No. 497-4

Unlike The Original Farmers Market and The Grove, employees and visitors to the Project Site would not pay for parking as part of their entry to the Project Site. Parking would be effectively free for visitors and audience members, and, therefore, there would be no reason to search for parking in the adjacent neighborhoods.

The cost of parking is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 498

Malka Shapiro
347 N. Detroit St.
Los Angeles, CA 90036-2530

Comment No. 498-1

I am a married woman with four children, I have lived in the neighborhood for a long time. I have been reading about the proposed TVC2050 project and have a couple questions about how this project will impact the culture of our neighborhood. We live in an area with many historic and cultural buildings, sites and homes.

Response to Comment No. 498-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 498-2 and 498-3.

Comment No. 498-2

The cultural historic monument designation of the CBS building was based on certain criteria that is City Law? What impact will the planned building have and could the designation be jeopardized? Is the designation be reevaluated since they're going to change the complex and buildings so much? There are buildings on the property from the 1960s and 1970s. Why wouldn't they be considered part of the historic fabric?

Response to Comment No. 498-2

This comment is nearly identical to Comment No. 459-3. Refer to Response to Comment 459-3, above.

Comment No. 498-3

I read about a settlement between the LA conservancy and the developer. Why and what is this agreement? Why hasn't the settlement agreement been provided to the public? The LA conservancy doesn't speak for me and my concerns for historical preservation.

Response to Comment No. 498-3

This comment is nearly identical to Comment No. 459-4. Refer to Response to Comment 459-4, above.

Comment Letter No. 499

Al Shayne
153 S. Laurel Ave.
Los Angeles, CA 90048-3513

Comment No. 499-1

I know a shady deal when I see one, and by golly this fits the bill. I have been a resident for over 40 years. I have seen a few of these e-documents. This Draft EIR is insufficient in its transparency regarding project benefits and past agreements with the project developer. This needs to be recirculated in the community so people are aware of this, or rather, aware of all that this is missing.

Response to Comment No. 499-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 499-2 and 499-3.

Comment No. 499-2

I read about a settlement agreement between the LA Conservancy and the project's developer. This gave me a lot of pause. What is that agreement? Does it influence the deal they have made here? Is the developer paying the Conservancy? This just seems immensely unknown and potentially dangerous to me. If we are being asked to provide public comment, we need the whole truth, and right now we don't have a grain of it. How can the City and community understand what these issues are if no one has been provided the Settlement Agreement.

Response to Comment No. 499-2

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the Draft EIR disclosed all of the elements of the Project required by CEQA and fulfills CEQA's purpose as an informational document that allows for meaningful public participation.

Comment No. 499-3

The Draft EIR has stated that the developer's return on investment is a project objective. What about the community the project is a [sic] going to dramatically change? Since the Developer has included ROI as an objective, we should know how much that could be. If this is about helping out the local area, I can't see how at this point, since no numbers have been given.

Response to Comment No. 499-3

This comment is identical to Comment No. 278-2. Refer to Response to Comment No. 278-2, above.

Comment No. 499-4

This proposal is frankly incomplete and insufficient. There are so many unanswered questions provided here that just don't add up. I know the community needs more information before any sort of decision can be made. If this dramatic change is being proposed, we need to know all the implications and potential outcomes that could occur.

Response to Comment No. 499-4

The Draft EIR was prepared in accordance with the requirements of CEQA. Specific issues raised by the commenter are addressed in Response to Comment Nos. 499-2 and 499-3. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA.

Comment Letter No. 500

Stephen Shiao
355 S. Citrus Ave.
Los Angeles, CA 90036-3035

Comment No. 500-1

I hope you will seriously reconsider whether the Television City studio project is compatible with our community and whether it is in the best interest of residents here. We are talking about a massive project that will take decades to construct, assuming a real construction timeline is ever made available, and it will pose serious risks to the health and safety of this community. The EIR does little to address the concerns my neighbors and I have, which does little to make me believe that we were considered at all in this process.

Response to Comment No. 500-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 500-2 through 500-5.

Comment No. 500-2

For starters, we have many residences, schools, temples and families that will be greatly impacted by this expansion effort. Why was a health assessment not included in this EIR? If thousands of trucks are going to be operating near our schools and worship centers, we are putting vulnerable populations at risk. Could you please explain how the health and safety of these communities was assessed? What were the findings? Please explain what the plan is to help keep children safe when thousands of trucks are going to be coming nearby every day? Why put our students at risk without having a plan? Will construction affect the operations at the hospital? Fairfax is not very accessible for that many large trucks, so what other avenues were considered for truck traffic? What about an air quality study? One that includes a much larger geographic area because more than a ½ mile will be seriously impacted? Could you please explain why there was not more community consultation in this process?

Response to Comment No. 500-2

The Draft EIR analyzed construction traffic in Section IV.K, Transportation, and the Transportation Assessment (Appendix M.1 of the Draft EIR) included a full analysis of construction traffic. As discussed therein, the Project includes the development of a CTMP for the Project as Project Design Feature TR-PDF-1. The Project would not result in

significant traffic safety hazards as construction staging, deliveries, etc. would generally occur within the boundaries of the Project Site. Any activity on the Project Site periphery would include pedestrian and bicycle protection and detours as necessary. The Project would comply with all construction safety requirements and would not introduce unusual features that could result in an unusual safety hazard. The haul routes use arterial streets and have been reviewed and approved by the City. By following standard rules and implementing the CTMP, the Project would not result in any significant safety hazards. Refer to pages IV.K-36, IV.K-37, and IV.K-80 of the Draft EIR; pages 179–184 of the Transportation Assessment; and Topical Response No. 14, Construction Vehicle Impacts, for additional information. Also refer to Response to Comment No. 9-29 regarding traffic hazards.

In terms of truck trip volumes, the comment suggests that “thousands of trucks are going to be coming nearby every day.” That statement is inaccurate. The busiest daily activity during construction will see a maximum of approximately 640 truck trips in the course of one day and that level of activity would only occur during the approximately 8.5-month excavation/foundation phase. During the day-to-day operation of the completed Project, the maximum truck activity is expected to be approximately 83 trucks producing 166 truck trips per day. In the case of both construction and Project operations, these truck trips would be spread out, and they would not all occur on any one street. Weight limitations would reduce the chance that Project trucks would utilize residential streets near the Project.

Section IV.A, Air Quality, of the Draft EIR includes an analysis of regional emissions. Refer to pages IV.A-59 through IV.A-62 therein. As discussed therein, the Project would result in an exceedance of NO_x. With implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_x emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. As such, Project construction would result in a significant Project-level and cumulative impact related to regional NO_x emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable. However, construction and operation of the Project would not result in localized air quality impacts. Refer also to Response to Comment No. 26-E.1-2 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR’s conclusion that health risk impacts would be less than significant.

With respect to public outreach, this Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeded the required 45-day Draft EIR public comment period. Following the publication of this Final EIR, a finalized draft of the Specific Plan and the Project’s other requested entitlements will be considered during several public hearings before City decision-makers prior to any decision made on the Project. The public will have additional opportunities to comment on the

Project at public hearings and meetings, including, but not limited to, City Planning Commission and City Council meetings, the dates of which will be provided to the public in accordance with the City's noticing requirements.

Comment No. 500-3

Additionally, the groundwater and dewatering analysis is confusing and doesn't address many issues. The levels for groundwater are pretty shallow in the area. What sort of dewatering can we expect? Please explain the health implications of dewatering. How can we know the full extent of groundwater impact if we do not know how long the project will last? Where will groundwater be disposed and has there been a health impact study?

Response to Comment No. 500-3

Refer to Response to Comment Nos. 3-7, 11-5, 11-25, 16-74, 16-85, and 26-65 and the Dewatering Report (Appendix FEIR-13 of this Final EIR) with respect to temporary construction dewatering as it relates to subsidence. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Draft EIR's analysis of groundwater quality. With respect to the health implications of dewatering, refer to Response to Comment No. 11-5.

Comment No. 500-4

An EIR that is thousands of pages with no clear guide for reading it is meant to mislead normal residents. Everything is so general it is hard to even navigate the appendices. Can you provide a greater explanation as to each reference where we are supposed to be looking? When were residents expected to have time to read through this massive EIR? Is this EIR even compliant with standards to educate the community?

Response to Comment No. 500-4

Refer to Response to Comment No. 26-4 regarding the length of the Draft EIR.

The Draft EIR is complete, adequate, and meets the requirements of CEQA. Section I, Executive Summary, of the Draft EIR includes an overview of the purpose and focus of the Draft EIR, a description of the organization of the Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for the Draft EIR, a list of the PDFs and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in the Draft EIR, including identification of the Environmentally Superior Alternative, consistent with CEQA Guidelines Section 15123. The Project Description contained in Section II, Project Description, of the Draft EIR meets the requirements of CEQA Guidelines Section 15124, as it describes the Project Site's precise location, includes a statement of the Project objectives, and provides a general description of the

Project's characteristics. The environmental setting contained in Section III, Environmental Setting, of the Draft EIR meets the requirements of CEQA Guidelines Section 15125 as it includes a description of the physical environmental conditions in the vicinity of the Project Site as well as a discussion of applicable land use plans. More detailed information regarding the Project's potential environmental effects is provided in Sections IV through VI of the Draft EIR, consistent with CEQA Guidelines Section 15126.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 for further discussion of how the Draft EIR meets the requirements of CEQA and additional discussion of the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Refer to Response to Comment No. 32-3 regarding how the Project exceeded CEQA's noticing requirements.

Comment No. 500-5

Why hasn't there been a public hearing to have the project details and impacts explained in clear terms that community members can understand and respond to?

Response to Comment No. 500-5

As discussed in Response to Comment No. 32-3 above, following the publication of this Final EIR, the Project and EIR will be considered during public hearings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings, the dates of which will be published in accordance with the City's noticing requirements.

Comment No. 500-6

There are too many unknowns here. I don't think you can put our community at risk like this and have so little to show for it. Maybe next time residents should be consulted about projects like this. I hope you reconsider this whole thing.

Response to Comment No. 500-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 500-2 through 500-5.

Comment Letter No. 501

Robert Shiell
853 S. Spaulding Ave.
Los Angeles, CA 90036-4607

Comment No. 501-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 501-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 502

Barton Shisoholha
8004 W. Fourth St., #5
Los Angeles, CA 90048-4450

Comment No. 502-1

The proposed Television City mega development is bad for Beverly Fairfax community and I would ask that more be done to study the impact it will have. I understand that the film and television industry is important but first and foremost our elected officials should protect residents from quality of life, especially against the all the negative this project will bring.

Response to Comment No. 502-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Note that quality of life is not a CEQA issue.

Comment No. 502-2

The proposal only has 5,300 parking spaces. This facility will be staffed by 8,000 employees and will also bring with it and thousands of audience members as well, where will the overflow parking be and has that even been studied? How will this affect Grove Drive? The metric being used to measure the traffic impact is called "VMT" but how and why this metric was chosen was never laid out to the public and I think fails to capture what the actual disruption will look like.

Response to Comment No. 502-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access to and use of The Grove Drive.

The change from LOS to VMT was implemented by the State of California, and all cities in California were required to follow the new protocol for determining the significance of impacts related to transportation. The origin of, and basis for, requiring transportation

analyses in CEQA documents to be based on VMT is discussed on pages IV.K-4 through IV.K-6 in Section IV.K, Transportation, of the Draft EIR. SB 743 directed the Governor's Office of Planning and Research to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (i.e., traffic congestion). The rationale behind this change was that reducing the miles traveled by automobiles associated with new development would be more effective than continuing to widen roadways to accommodate the additional travel demand. As further discussed in Section IV.K of the Draft EIR, including, but not limited to, on pages IV.K-6, IV.K-13, IV.K-14, and IV.K-31, LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits. The methodology for determining VMT based on the VMT Calculator is consistent with the CEQA Guidelines and the TAG. Refer to Topical Response No. 8, Vehicle Miles Traveled.

Comment No. 502-3

This project is projected to need 60,000 truck trips to complete its construction. The city does not lay out if it has studied how the proposed staging area for these trucks will affect Loyola Highschool, Kaiser hospital, the Holocaust Museum, or the historic cemetery. I would ask that each of these important community assets be studied individually so that we can clearly see how the community will be changed.

Response to Comment No. 502-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction truck trips.

Refer to Response to Comment Nos. 178-3, 183-1, and 231-4 regarding off-site staging. All haul truck staging locations would be provided on-site; accordingly, no haul trucks would be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 502-4

The applicants anticipates that this project will take 25 years to build. The city needs to study if this constant construction will lead to a decline in new businesses opening in the area and how this extended construction period will harm existing businesses. What person will want to explore and enjoy a neighborhood engulfed in truck traffic and dust?

Response to Comment No. 502-4

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

As discussed in Section IV.A, Air Quality, of the Draft EIR, the Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA. This Final EIR also includes a quantitative HRA which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Refer to Response to Comment No. 26-E.1-2 and the HRA included as Appendix FEIR-10 of this Final EIR for further discussion.

Comment No. 502-5

These are just a few of the many concerns I have, please deny this project until more due diligence has been done on this will change our neighborhood.

Response to Comment No. 502-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 502-2 through 502-4.

Comment Letter No. 503

Ronald Shlesman
531 N. Alta Vista Blvd.
Los Angeles, CA 90036-1966

Comment No. 503-1

I am opposed to the TVC 2050 mega development.

Response to Comment No. 503-1

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 503-2

The developer doesn't seem to care at all about noise pollution. Remember—this studio is very near people's homes. They're making the Television City building bigger and noisier. There are children living nearby with sensory issues, it is hard enough now without a new studio doing whatever it wants very close to their homes.

Response to Comment No. 503-2

This comment does not raise any specific issue with the noise analysis. Note that the detailed noise analysis provided in Section IV.I, Noise, of the Draft EIR concludes that noise impacts associated with operation of the Project would be less than significant. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 503-3

Here are my big concerns:

How much noise will be generated during construction of the development? I am seeing a 20-year build out. Will the community be dealing with noise from that construction the entire time? I believe we should have a more detailed construction plan. How much noise will be generated by each phase of the development, and who will be impacted by that?

Response to Comment No. 503-3

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

The Project's potential noise impacts during construction are analyzed on pages IV.I-35 to IV.I-43 in Section IV.I, Noise, of the Draft EIR. The noise assumptions for each piece of construction equipment are provided in Table IV.I-9 of Section IV.I, Noise, of the Draft EIR, and the resulting noise levels for each construction stage at each receptor location are provided in Table IV.I-10 of the Draft EIR. Noise levels with mitigation measures included are provided in Table IV.I-19 of the Draft EIR.

Comment No. 503-4

Where is the analysis of expected noise levels, and from what sources, that will be generated during construction and then generated when the facility starts being used?

Response to Comment No. 503-4

Refer to Response to Comment No. 503-3 regarding the construction noise analysis.

With respect to operational noise, refer to pages IV.I-43 through IV.I-56 of the Draft EIR. As discussed therein, impacts would be less than significant.

Comment No. 503-5

What about outdoor gatherings? Will these be on site? Could there be concerts? Is there any rule preventing those from happening? How frequent could outdoor gatherings be? How many people would be allowed to attend an outdoor gathering on the site at once? What times would they be allowed? Are there any rules governing what kinds of outdoor gatherings are allowed? Could they host a party with a thousand people outside? Could people be yelling, cheering, or screaming? Did the EIR study these noise impacts? If not, why would they be excluded?

Response to Comment No. 503-5

Refer to Response to Comment No. 26-135 for a discussion of the outdoor noise analysis, including assumptions with respect to the location of outdoor decks and the number of people. As discussed on page IV.I-45 in Section IV.I, Noise, of the Draft EIR, outdoor gathering areas would be used between 7:00 A.M. to 12:00 A.M. In addition, Project Design Feature NOI-PDF-4 establishes the noise limits for any amplified sound system for outdoor gatherings on roof decks as to not exceed the City's noise limit (i.e., an increase of

5 dBA above the ambient noise level) at any off-site noise-sensitive receptor location. As provided in Table IV.I-13 in Section IV.I, Noise, of the Draft EIR, the estimated noise levels from the outdoor uses, including amplified sound, would be below the significance criteria and noise impacts would be less than significant. Lastly, the Project does not propose a concert venue. Refer to Topical Response No. 3, Permitted On-Site Uses.

Comment No. 503-6

I would appreciate a response to these concerns. Many residents who hope for a little more peace and quiet would really appreciate additional information from the developer

Response to Comment No. 503-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 503-2 through 503-5.

Comment Letter No. 504

Elliot Shoenman
8256 W. Fourth St.
Los Angeles, CA 90048-4402

Comment No. 504-1

I heard that there's a plan to spend twenty years renovating TV City, and that part of that plan is to allow a lot more traffic near our schools. There's enough smog and traffic to deal with in LA as it is. We should not be exposing our children even more to these dangers by parking thousands of 18-wheelers near places like Loyola High.

Response to Comment No. 504-1

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Refer to Response to Comment Nos. 178-3, 183-1, and 231-4 regarding off-site staging. All haul truck staging locations would be provided on-site; accordingly, no haul trucks would be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment Nos. 426-4 regarding emissions near the school. As discussed therein and shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with incorporation of mitigation measures. The Project also includes a quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Refer to Response to Comment No. 26-E.1-2 for further discussion of the HRA.

The remainder of this comment provides a general statement on concern regarding the traffic and air quality conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 504-2

Added traffic is one thing in this city, but it isn't even going in service to the neighborhood. We still have a lack of housing all across the city. Instead of building something we could all use, now you want to just enrich another developer. Come on.

Response to Comment No. 504-2

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action being taken on the Project.

Comment No. 504-3

I have not seen any analysis on how these issues will be mitigated, likely because there isn't any. How can knowingly exposing school children to toxic fumes from cars and trucks be justified anyway? You would have to admit that approving a project with these kinds of impacts is deciding that any so-called benefits outweigh these harmful health effects.

Response to Comment No. 504-3

As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation would be less than significant at sensitive receptors. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 504-4

We cannot get exploited like this. Please consider your constituents when voting out no on this ridiculous plan.

I would appreciate a response

Response to Comment No. 504-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 505

Linda Shoenman
8256 W. Fourth St.
Los Angeles, CA 90048-4402

Comment No. 505-1

The city of Los Angeles has dishonored its citizens (yet again!). Time and time again, development projects walk all over residents of this city just to make the rich richer and richer, and richer. Is this why there has been no public hearing regarding the TVC 2050? How many billions will this project make the new owner of the CBS building? And at the expense of who?—the residents of Beverly Fairfax. It is ABHORRENT.

Are residential needs no longer relevant? Don't bother asking that to the millionaires and billionaires of this city, and don't even think about asking the politicians....

Response to Comment No. 505-1

As discussed in Response to Comment No. 32-3, following the publication of this Final EIR, the Project and EIR will be considered during public hearings before City decision-makers prior to any decision being made on the Project. The remainder of this comment, which does not address CEQA-related issues, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 505-2

I can hardly park my car now. What will it be like for years of construction to come? The EIR says 3 years of construction, but you can't tell me that a project of this magnitude will be completed in 3 years. To me, we are talking about 10+ years of ridiculous traffic, detours on our already loaded streets, and public safety issues that nobody has even considered. But yes, the almighty dollar reigns again.

Response to Comment No. 505-2

This comment is identical to Comment No. 239-3. Please refer to Response to Comment No. 239-3, above.

Comment No. 505-3

I am requesting that the city hold a public hearing regarding TVC 2050 with posted public notices and full presentation given to our community members. There should be an

opportunity for all concerned members of the community to ask as many questions as needed and get their questions answered.

Response to Comment No. 505-3

Refer to Response to Comment No. 505-1 regarding public hearings.

Comment Letter No. 506

Linda Shoenman
8256 W. Fourth St.
Los Angeles, CA 90048-4402

Comment No. 506-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 506-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 506-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 506-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 506-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 506-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 506-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 506-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 506-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 506-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 506-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 506-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 506-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 506-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 507

Lena Shor
935 N. Genesee Ave., Apt. 3
West Hollywood, CA 90046-7348

Comment No. 507-1

As a community member, I have quite a few concerns regarding the Television City project. From a residential standpoint, I do not know what these plans mean for the future of my neighborhood.

Response to Comment No. 507-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 507-2 through 507-6.

Comment No. 507-2

In the EIR, I read that the building of this project is anticipated to begin in 2043. If that information is true, why is there no mention of the construction site being electric? We simply cannot afford to pollute LA more by allowing these toxic emissions.

Why is the project planning to use natural gas? What does that say about LA's efforts to combat climate change?

Response to Comment No. 507-2

Please refer to Response to Comment No. 26-137 regarding the feasibility of electric construction equipment. In addition, the Project would use electric power, if available, and/or solar generators, rather than temporary diesel or gasoline generators during construction per Project Design Feature AIR-PDF-1 (see page IV.A-47 of the Draft EIR).

New natural gas would not be used as part of the Project (with certain exceptions) consistent with the City's new all-electric buildings ordinance. Please refer to Response to Comment No. 26-51 regarding the City's new all-electric buildings ordinance, with which the Project would comply.

Regarding toxic emissions, as stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as

Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations. The HRA was conducted using conservative assumptions and utilizes methods formulated to be protective of the health of the most sensitive individuals in the population. All Project-related emission sources, including diesel construction equipment, were analyzed in the HRA.

Comment No. 507-3

I feel extremely unsafe when imaging this project in our neighborhood. Who is willing to address the fact that this area of LA has naturally occurring methane? What happens when these high levels of methane are released into the air, and we are left struggling to breathe? This exposure results in 1 million premature deaths every year, and the EIR leaves this unaddressed. What is the point in building underground studios if this risk jeopardizes the city's health?

Response to Comment No. 507-3

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane and methane mitigation.

Comment No. 507-4

I also read there will be a gas station and a mechanic shop on site. Once again, this does not seem very safe. Please evaluate the impacts having a fueling station near residents will have and provide those impacts when responding to my letter.

Response to Comment No. 507-4

The Project would not include fueling stations. This clarification is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 507-5

As community members, why are we not aware of where the fueling station will be or where the power generators will be located?

Response to Comment No. 507-5

Please refer to Response to Comment No. 26-E.1-18 for a detailed discussion of the Project's emergency generators, their potential locations, and their required emission standards.

Refer to Response to Comment No. 507-4 regarding fueling stations.

Comment No. 507-6

Besides safety, is the public's well-being taken into account at all during the planning of this project? The EIR does not state that the loudest activities will remain in property lines. Because there is no set plan of development, can noisy activities happen anywhere? I am very worried about what this means for the noise levels of operation. Not only during daily operations, but what about the noise levels at the events that will be held at Television City and the filming that will take place? There is no analysis on when these things will take place. Is the community going to be tormented by constant loud music and hollering?

Response to Comment No. 507-6

The issues discussed in this comment are similar to those in Comment Nos. 147-3, 247-4, and 298-7. Refer to Response to Comment Nos. 147-3, 247-4, and 298-7, above.

Comment No. 507-7

There does not seem to be near enough evaluation for this project to become a reality. The city planners and everyone involved need to take into account the neighborhoods and their safety, privacy and respect.

Response to Comment No. 507-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 507-2 through 507-6.

Comment Letter No. 508

Gurinder Sidhu
537 Alandele Ave.
Los Angeles, CA 90036-3250

Comment No. 508-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 508-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 509

Jacob Sidney
537 N. Orlando Ave., Apt. 5
Los Angeles, CA 90048-2530

Comment No. 509-1

I have questions about the Television City Project as well as a fair number of concerns. I live in the area and feel as though many components of the project have been overlooked.

Response to Comment No. 509-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 509-2 through 509-5.

Comment No. 509-2

My first question is about the phasing of the project. Why haven't we seen a phasing plan so that we know what is being built and when? I want to know when there will be traffic in which areas so I can prepare accordingly for that. However, I cannot do that because I don't know what is being built.

Response to Comment No. 509-2

Refer to Response to Comment No. 9-24 regarding the Project timeline. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 96-5 regarding the proposed CTMP. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the Project Description and the proposed development program that was analyzed in the Draft EIR.

Comment No. 509-3

First of all, I am concerned about the lack of housing in the project. Los Angeles needs more housing and yet this new proposal to expand the studios does not include any housing. This land could be used to house Los Angeles residents, which would be far more beneficial for the city than simply more studios, offices and parking space. Did the developer ever consider adding housing to this proposed massive plan? Why isn't there a requirement that he has to?

Where is it expected all the employees that will be there will live? Will landlords evict current tenants and raise rental rates, to make more rentals available to all those people?

Response to Comment No. 509-3

Refer to Response to Comment No. 32-7 regarding existing and proposed uses at the Project Site, the underlying purpose of the Project, the provision of housing, and the consideration of economic and social effects under CEQA. Refer also to Response to Comment No. 159-4 regarding the consideration and analysis in the Draft EIR of an alternative to the proposed Project that includes a housing component.

Comment No. 509-4

Second, I don't understand how the city can place a large parking structure of [sic] Grove Drive. Anyone who lives in the area knows that Grove Drive is right across from a park that is filled with seniors and children. Not to mention, it's already a small street that cannot handle more traffic. How does the developer plan to protect the kids and elderly residents that frequent this area? How do you plan to mitigate the diesel exhaust coming from the trucks?

Response to Comment No. 509-4

The southeast parking structure in the Conceptual Site Plan is located immediately adjacent to the larger parking structure for The Grove shopping center. The Grove Drive is classified as a Collector Street in the City's Mobility Element of the General Plan, and the distribution of Project access to and from the parking structures serving the Project and serving The Grove shopping center is consistent with the function and purpose of a Collector Street. Project parking would be spread out throughout the Project Site.

Section IV.A, Air Quality, of the Draft EIR includes an analysis of construction emissions. As discussed therein, the Project would result in an exceedance of NO_x. With implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_x emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. As such, Project construction would result in a significant Project-level and cumulative impact related to regional NO_x emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable. However, construction and operation of the Project would not result in localized air quality impacts. The Project also includes a quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Refer to Response to Comment No. 26-E.1-2 for further discussion of the HRA. Please refer to Response to Comment No. 231-3 for a

detailed discussion of health risk impacts (including seniors and children) related to Project-related operations.

Refer to Topical Response No. 12, Safety and Congestion, regarding pedestrian safety.

Comment No. 509-5

This will also add a ton of traffic and we have yet to see what the impact will be when people use the Grove gate. When will we see adequate analysis to understand this impact? How can the plan move forward before there is thorough understanding of the impacts?

Response to Comment No. 509-5

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The effects of Project vehicles entering and exiting the Project Site, including via The Grove Drive driveway, are included in the non-CEQA operational analysis, which is summarized in Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR). The results show that the three signalized intersections providing access to the Project Site would all operate at LOS B after full buildout of the Project. Topical Response No. 12 provides a discussion of the queuing provided at each signalized entrance to the Project Site.

Refer to Response to Comment Nos. 26-171 and 26-E.4-17 regarding access to and use of The Grove Drive.

Comment No. 509-6

I appreciate you taking the time to read this letter and answering my questions. I hope an agreement can be reached that has more concern for the community members who will be impacted by this project.

Response to Comment No. 509-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the

decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 509-2 through 509-5.

Comment Letter No. 510

Pamela Silverman
750 S. Spaulding Ave., Apt. 101
Los Angeles, CA 90036-4551

Comment No. 510-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 510-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 511

Lachap Simmans
6151 Blackburn Ave.
Los Angeles, CA 90036

Comment No. 511-1

I am writing to express concern about the excavation activity described in the DRAFT EIR for this project. It appears that the development would be allowed to go down 45 feet. Given the tar and methane below ground level in the area, this kind of allowed excavation seems much too risky. Please address this concern.

Response to Comment No. 511-1

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 regarding the Draft EIR's analysis of groundwater quality. Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of tar and methane and the associated mitigation.

Comment No. 511-2

Do we know how this will impact groundwater? What kinds of gases will be released? What about the impact of hundreds of trucks full of dirt leaving the site?

Response to Comment No. 511-2

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, and 26-87 regarding methane and subsurface gases. Refer to Response to Comment Nos. 3-7 and 11-5 and the Dewatering Report (Appendix FEIR-13 of this Final EIR) with respect to construction dewatering as it relates to groundwater quality. Additionally, as discussed on page IV.F-40 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, it is conservatively assumed that an estimated 60,000 cubic yards of exported soil may include hazardous soil materials which would be exported to Buttonwillow Landfill in Kern County. Project construction activities would not create a significant hazard to the public or the environment through the use, handling, transport, or disposal of hazardous materials during construction, and development of the Project would not exacerbate any current environmental conditions so as to create a significant hazard to the public or the environment. With implementation of appropriate hazardous materials management protocols at the Project Site and continued compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Comment No. 511-3

I am also concerned about water usage. The plan proposes that TVC 2050 will use six times more water than the current CBS Television City site. We are in a drought. How can this possibly not be a significant impact? How does it account for all the different uses of water [sic]

I do not understand their water plan and I can't see how the city can move forward without knowing.

Response to Comment No. 511-3

Refer to Response to Comment Nos. 16-66 and 26-175 with regard to the adequacy of water supply and consideration of drought conditions and to Response to Comment No. 223-2 with regard to the types of uses that would generate a demand for water within the Project Site.

Comment Letter No. 512

Sizeifman
421 N. Poinsettia Pl.
Los Angeles, CA 90036-2504

Comment No. 512-1

The plan being proposed for Television City is alarming for me and my neighbors, long time residents of the area. It seems pretty clear that there will be significant impacts to our neighborhood if this project gets built.

Response to Comment No. 512-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 512-2 through 512-5.

Comment No. 512-2

One of my main concerns has to do with all of the added emissions that will pour into our community. The addition of thousands of cars and construction trucks into our already horrendous traffic is unimaginable. There is so much idling of vehicles that occurs now because we sit bumper to bumper for miles, can't get through intersections, and it takes 3 and 4 times as long to get where we're going because of the gridlock. So what do the studies show about the actual impacts that the community will have to deal with? Specific and detailed information is requested. What exactly will be the pollutants, the levels of emissions, and impacts to our health as a result?

Response to Comment No. 512-2

Refer to Sections IV.A, Air Quality, IV.E, Greenhouse Gas Emissions, and IV.K, Transportation, of the Draft EIR's for the analyses of the Project's potential air quality, GHG and transportation impacts.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Response to Comment No. 155-4 regarding the proposed CTMP.

Refer to Response to Comment No. 126-2 regarding truck idling. Tables IV.A-7, IV.A-8, IV.A-10, IV.A-11, and IV.A-12 in Section IV.A, Air Quality, of the Draft EIR summarize the Project emissions, including emissions from vehicles, and compare those emissions to the applicable thresholds of significance. Refer to Topical Response No. 10, Trip Generation, regarding vehicle trips during operation of the Project. Refer to Topical Response No. 14, Construction Vehicle Impacts, regarding construction vehicle trips.

As stated on pages IV.A-69 and IV.A-72 in Section IV.A, Air Quality, of the Draft EIR and further confirmed by the quantitative HRA, included as Appendix FEIR-10 of this Final EIR, human health impacts from Project construction, operation, and overlapping construction and operation during the long-term buildout would be less than significant at sensitive receptor locations.

Comment No. 512-3

Please don't refer me to the air quality study or an appendix. These documents are technical, and the average resident should not have to try to decipher the information. And the draft EIR refers to a "general description of the adverse health impacts resulting from the pollutants at issue is all that can be feasibly provided at this time." Does the city expect to consider and approve an enormous development with only a "general description of adverse health impacts"? Is the city going to tell its residents that it is prepared to do that?

Response to Comment No. 512-3

This comment is referring to the discussion of regional emissions and human health as it relates to the *Friant Ranch* case on pages IV.A-80 to IV.A-82 of the Draft EIR. Refer also to Response to Comment No. 11-26. As discussed in Response to Comment No. 11-26, the City has provided guidance documenting the public health consequences resulting from exposure to pollutants. The guidance document also explains that direct correlation of an individual project's emissions and health effects is not feasible, as no expert agency has approved a quantitative method to identify health effects for the scale of projects typically analyzed in City EIRs. Section 3.d in Section IV.A, Air Quality, of the Draft EIR analyzed localized construction and operational air quality impacts resulting from Project emissions consistent with SCAQMD Localized Significance Threshold (LST) guidelines. SCAQMD's localized significance thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. As shown in Table IV.A-10 of the Draft EIR, Project localized operational emissions would not exceed SCAQMD significance thresholds, resulting in a less-than-significant impact. As shown in Table IV.A-11 of the Draft EIR, Project localized construction emissions with incorporation of mitigation measures would not exceed SCAQMD significance thresholds, resulting in a less-than-significant impact. Thus, no

sensitive receptors would be impacted by increased air emissions due to construction and operation of the Project.

Section 3.d in Section IV.A, Air Quality, of the Draft EIR also analyzed air quality impacts associated with Project vehicle trips. Consistent with the carbon monoxide (CO) methodology discussed on page IV.A-45 in Section IV.A, Air Quality, of the Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At Project buildout, the highest average number of daily trips at an intersection would be approximately 65,260 trips at La Brea Avenue and Beverly Boulevard, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP. Therefore, the Draft EIR correctly concluded that the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots, and impacts related to localized mobile source CO emissions would be less than significant. Thus, no sensitive receptors would be impacted by Project-related vehicular air emissions due to the operation of the Project.

In response to SCAQMD comments on the Draft EIR, a quantitative HRA has been prepared and is included as Appendix FEIR-10 of this Final EIR. The HRA demonstrates that whether considered separately or combined, construction risk estimates and incremental operational risk estimates at the PMIs would be below SCAQMD's risk thresholds, confirming the conclusions on pages IV.A-69 and IV.A-71 in Section IV.A, Air Quality, of the Draft EIR that Project-related emissions of TACs would result in a less-than-significant impact.

SCAQMD risk thresholds are 10 in one million over 30 years of exposure for new carcinogenic (cancer) risks, a value of one for acute (short-term exposure) risks, such as many non-recurring respiratory discomforts, and a value of one for chronic (annual) risks, such as the formation of long-term impacts, such as bronchitis. As shown in the HRA, the Project's risk values would be well below these established risk values at the maximally exposed receptors (peak impact).

Comment No. 512-4

Please explain how the city considers this project to be a typical city project? How were estimates derived as to the daily construction NOx emissions? The draft EIR suggests the maximum daily construction NOx emissions of 105 pounds IS over the South Coast Air Quality management district's significance threshold, so doesn't that mean the emissions will exceed the significance threshold? Why would that be allowed? And what about the reference to regional emissions? What matters is the emissions that float into our neighborhoods, our backyards, our schools and playground, our parks—so are emissions being studied for our community or for the region? Because looking at emissions in a

regional framework is not the same thing as the impacts to the immediate and surrounding community.

Response to Comment No. 512-4

Section IV, Other CEQA Considerations, of the Draft EIR summarizes all significant unavoidable impacts which might be associated with the Project and indicates the reasons why the Project is being proposed, notwithstanding those impacts. Further, exceeding an impact threshold is not prohibited or against the law. Rather, exceeding an impact threshold requires that: (1) feasible mitigation measures would need to be provided; and (2) if an impact is still significant, then the decision-makers need to justify why the project benefits override the significant unavoidable impact. As discussed above in Response to Comment No. 512-3, localized construction and operational emissions would remain below the significance thresholds for the closest sensitive receptors to the Project Site after mitigation.

Comment No. 512-5

The city should be holding neighborhood meetings to make clear all of the relevant information about the air quality, health risks, and adverse impacts related to this project. When will those meetings be held?

Response to Comment No. 512-5

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding future public hearings.

Comment No. 512-6

I look forward to your response to my questions.

Response to Comment No. 512-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 512-2 through 512-5.

Comment Letter No. 513

Fred Smillow
514 W. 26th St., Apt. 401
San Pedro, CA 90731-6386

Comment No. 513-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 513-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 514

Ron Smith
ronsmithproductions@gmail.com

Comment No. 514-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

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Response to Comment No. 514-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 515

Leslie Sobel
428 N. Kilkea Dr.
Los Angeles, CA 90048-2229

Comment No. 515-1

Television City is proposing an expansion and there are problems with the DEIR. I need more information, please.

Response to Comment No. 515-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 515-2 through 515-6.

Comment No. 515-2

As a 30 year resident, my primary concern is related to traffic and its environmental impact. If there is an underground parking garage, please confirm that all vehicles be able to access it only through the Beverly and Grove gates. In addition, the garage appears to have facilities for production in it. How will cars and those production areas both be able to use the garage?

Response to Comment No. 515-2

As discussed in Topical Response No. 13, Parking, parking would be spread out across the entire Project Site, and all parking areas would be accessible from any of the three signalized entrances to the Project Site. Refer to Section A, Queuing at Project Driveways, and Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, for details regarding parking access. The southeast parking structure in the Conceptual Site Plan does include a ground level basecamp area, and the trucks to/from the basecamp area and the automobiles utilizing the parking spaces would have separate travel paths so as to not interfere with one another. Refer to Response to Comment Nos. 26-121 and 26-122 regarding the difference between basecamp and production support.

The environmental impacts associated with Project trips are analyzed in the Draft EIR. As discussed in Section IV.K, Transportation, of the Draft EIR, transportation impacts would be less than significant. Refer to the analysis of off-site noise on pages IV.I-48 through IV.I-54 of Section IV.I, Noise, of the Draft EIR. As demonstrated therein, impacts

would be less than significant. With respect to the effect of traffic on air quality, refer to page IV.A-71 of Section IV.A, Air Quality, of the Draft EIR. As demonstrated therein, impacts would be less than significant.

All vehicles would be able to access any parking facility on the Project Site from any of the three signalized entrances to the Project.

Comment No. 515-3

The number of parking spaces listed is 5,300, so please explain how the 8,000 employees will park. How was that number derived as an accurate estimate for parking spots considering the employees and visitors to the site?

Response to Comment No. 515-3

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 515-4

Please provide an explanation of the Vehicle Miles Travelled analysis. It appears to show that average travel distance is 3.5 miles, which does not seem possible for workers at Television City. Additionally, are the miles travelled for visitors included? The audience members coming to the site each day will potentially number in the thousands. Please show how these people's miles travelled are included in the VMT analysis. Also show how the additional traffic and air pollution will increase.

Response to Comment No. 515-4

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. The 3.5-mile average travel distance statement in this comment represents an inaccurate interpretation of the work VMT per employee calculation. Audience trips represent a small percentage of the total trips to/from the Project Site and are not included in the calculation of work VMT per employee, consistent with CEQA requirements.

Refer to Topical Response No. 10, Trip Generation, for information about studio audience and visitor trip generation. As discussed therein, these trips comprise a small

percentage of the total trips to/from the Project Site. When other trip types are a small component of overall VMT, the Technical Advisory on Evaluating Transportation Impacts in CEQA (California Governor's Office of Planning and Research, December 2018) recommends that the focus of VMT reduction efforts should be on trips between home and work. Therefore, the work VMT per employee analysis is based on vehicle miles of travel by the employees from their homes to the Project Site, which is not affected by visitors, audience members or delivery truck trips.

Refer to Response to Comment No. 515-2 for a discussion of air quality impacts associated with construction.

Comment No. 515-5

The trucks during construction create additional gridlock and pollution, not to mention an unsafe environment for me and my dog Roxy.

Response to Comment No. 515-5

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Refer to Response to Comment No. 515-2 regarding the Draft EIR's air quality analysis. Refer also to Response to Comment No. 26-E.1-2 and the quantitative HRA included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant.

Comment No. 515-6

How will these problems be addressed to the satisfaction of the community? This all seems very unsafe.

Response to Comment No. 515-6

The Project's CTMP includes a provision that the Applicant would designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries.

In terms of potential traffic impacts during the operation of the completed Project, the neighbors, Applicant, and LADOT will work together to prepare an NTMP aimed at reducing traffic impacts on the adjacent neighborhoods.

Comment Letter No. 516

Marnin Somerman
6437 Lindenhurst Ave.
Los Angeles, CA 90048-4731

Comment No. 516-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 516-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 517

Erica Sommer
208 S. Formosa Ave.
Los Angeles, CA 90036-2814

Comment No. 517-1

In the TVC 2050 Environmental Impact Report (Land Use and Planning Chapter), the report refers to a studio headquarters site to be adaptable and expandable over time to meet the changing needs of the entertainment industry. How are impacts of a proposed project supposed to be analyzed while the project could also be allowed to be adaptable and expandable? How then are parameters established for what could be allowed as part of adapting and expanding? Without any parameters, then it would seem a developer could do anything. Who defines what the changing needs of an industry are? If industry needs are always changing, how does the community then respond to a building that could continue to change and expand? How can a community be assured that information about the true impacts is factual and grounded in reasonable assumptions?

Looking at the rest of the chapter, currently television city is designated under 'community commercial' zoning but this proposed project wants to expand the zoning of the site to encroach into the 'limited commercial' zoning and 'neighborhood commercial' zoning overlay that sits on the corner of Beverly Boulevard and The Grove Drive. What do these things mean? What are the implications for these zoning changes? Wouldn't this zoning change ultimately reduce housing in the area? Is there no way for the proposed development to be completed without a zoning change that would inevitably reduce housing?

Response to Comment No. 517-1

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 9-13 with regard to the Project Description and proposed Specific Plan, the proposed development program that was analyzed in the Draft EIR, the proposed Land Use Exchange Program, and the regulatory framework in the proposed Specific Plan. Refer to Response to Comment No. 26-16 regarding the Project objective to "provide an expandable, flexible, and operationally seamless production ecosystem that can respond to evolving market demands, support content creation, and maximize studio production capabilities." An expandable, flexible and operationally seamless production ecosystem is referring to the mix of uses and activities that are needed to support the continued operation of a modern studio in a manner that responds to the changing demands of the entertainment industry. Refer to Topical Response No. 3,

Permitted On-Site Uses, and Response to Comment No. 5-6 with regard to the land uses that would be permitted in the proposed Specific Plan.

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed General Plan Amendment to change the Project Site's existing land use designations to a unified Regional Commercial designation, which was fully analyzed in the Draft EIR in accordance with CEQA; refer to Section IV.H, Land Use and Planning, of the Draft EIR.

Refer to Response to Comment No. 16-73 regarding how no changes to the allowable residential density potential would occur as a result of the Project.

Comment Letter No. 518

Nachum Saver
428 N. Detroit St.
Los Angeles, CA 90036-2529

Comment No. 518-1

As a 35 year resident, I am very concerned about the proposed increase in the size of the Television City studio.

Response to Comment No. 518-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 518-2 and 518-3.

Comment No. 518-2

What does the construction period mean for my neighborhood? What kinds of disruptions to traffic will take place? On all streets surrounding the studio? More disruptions on some streets than on others? How the community supposed to keep track? What notifications will be sent out as to the disruptions, what they will be and when they will be scheduled? How far in advance will the area be told? Does it depend on what kind of disruption it is, such as a lane closure, or a sidewalk being torn up, or parking spaces being blocked?

Response to Comment No. 518-2

This comment is identical to a portion of Comment No. 129-2. Refer to Response to Comment No. 129-2, above.

Comment No. 518-3

The project developers owe it to the residents of and visitors to this area to designate a specific route for truck drivers to follow instead of them deciding their own path through the neighborhood. What will those routes be? Will truck traffic be limited to certain times of the day and days of the week? Will the truck routes be determined prior to the EIR being finalized and project possibly approved, not after? Because otherwise how are the public, city planners, and council members (who will be voting on the project) be fully informed, if these kinds of important pieces of information are not known beforehand?

Response to Comment No. 518-3

This comment is identical to a portion of Comment No. 129-2. Refer to Response to Comment No. 129-2, above.

Comment No. 518-4

I would appreciate responses to all of my questions and concerns.

Response to Comment No. 518-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 518-2 and 518-3.

Comment Letter No. 519

Lola Spector
612 N. Laurel Ave.
Los Angeles, CA 90048-2321

Comment No. 519-1

The studios are in the business of promoting themselves and the movies and TV shows they make. What is the plan for billboards and advertising signage in the area? Will the planned signage be distracting? Will it block views? How large? We already have a lot signs in the area, and to me, it overly commercializes the area and cheapens the place where we live. Will there be a limit to the kinds, size and amount of signage to make sure it isn't splattered everywhere? It's Hollywood. They are in the business of "big, big and bigger!" How do we keep the signs from doing the same? Are there regulations to stop these billboards being lit up at night? Will video boards be allowed? Let's be real.

Response to Comment No. 519-1

This comment is identical to Comment No. 408-4. Refer to Response to Comment No. 408-4, above.

Comment No. 519-2

These types of billboards are a blight on the community and use a huge amount of energy.

Response to Comment No. 519-2

This comment is identical to Comment No. 408-5. Refer to Response to Comment No. 408-5, above.

Comment No. 519-3

Finally, what is the studio going to let people work from home and limit traffic and congestion? Zoom meetings work, and remote working should be factored into new large-scale-employers coming into the area. Where is the study that looks at how many of the new employees can do some of those expected jobs remotely? How many staff could be impacted? People can collaborate over vast distances effectively, and don't need to commute across town to sit in an office and type on a computer.

Response to Comment No. 519-3

This comment is identical to Comment No. 408-6. Refer to Response to Comment No. 408-6, above.

Comment Letter No. 520

Debra Spidell
464 S. Orange Dr.
Los Angeles, CA 90036-3510

Comment No. 520-1

I learned about the CBS studio expansion, or the "Television City Project," and after looking through the draft EIR I have a lot of concerns. It looks like we can all expect to have major, disruptive construction with no end in sight.

Response to Comment No. 520-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 520-2 through 520-6.

Comment No. 520-2

The developer has put in no effort to educate the community, and we should not be expected to have to learn everything on our own.

Response to Comment No. 520-2

Refer to Response to Comment No. 28-13 regarding public outreach and Response to Comment No. 32-3 regarding noticing.

Comment No. 520-3

I am very concerned about the issue of signage for this project. It seems like the entire area is just going to be covered in huge billboards. Is that the plan? How many and where will they be installed? Will there be other signage as well? Will the signs be lighted at night? What sort of costs will be pushed on to the community for the energy used? It always seems like taxpayers are responsible for picking up the costs for major projects like this one, and we never even asked for this project to be here.

Response to Comment No. 520-3

Refer to Response to Comment Nos. 5-10, 26-129, and 277-2 regarding signage.

Regarding the energy used for the signage, refer to Response to Comment No. 102-6.

The Project would be privately funded and would not burden the community and tax payers with the cost of energy usage by the Project.

Comment No. 520-4

Also please explain what the project alternatives are for this project? How are alternatives even identified? Will the EIR address every possible alternative in its analysis? What about alternatives that aren't included in the draft EIR? Please explain what an analysis of alternatives looks like and whether residents can expect to hear about any alternatives. How about the alternative of no project? Why isn't that being given more serious consideration?

Response to Comment No. 520-4

Refer to Topical Response No. 16, Project Alternatives Analysis, and Response to Comment No. 384-3 regarding the CEQA analysis of Project alternatives.

Refer to Response to Comment No. 35-160 regarding the no project alternative.

Refer to Response to Comment No. 32-3 regarding the noticing of the Project in compliance with CEQA.

Comment No. 520-5

How will the development start? Is there a specific month by month plan for development? Will the project be completed in phases, and, if so, can you show a plan to the community? We deserve to at least have a plan, and to know how many years of construction. And where will all of the people associated with the project go? There are thousands of construction workers for this, thousands of employees that will be working at the offices, but there is no plan to fit all of these new people coming to my neighborhood. Where do these people plan on parking? What happens if people begin parking in our neighborhoods? Who is responsible for enforcement of parking? I feel like this will cause serious safety issues for the community, but is that something that will be addressed?

Response to Comment No. 520-5

The start of construction cannot be set precisely until the Project is approved by the City Council and building permits for individual buildings and structures are issued by the

City. Refer to pdf page 30 of Appendix B, Air Quality and Greenhouse Gas Emissions, of the Draft EIR for the construction schedule that was analyzed.

Refer to Response to Comment No. 9-24 regarding the buildout timeline. As stated throughout the Draft EIR, construction is anticipated to begin as early as 2023 with buildout as early as 2026.

Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of construction truck trips.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Enforcement of the current (and any future) neighborhood parking permits would be the responsibility of the LADOT Parking Enforcement Officers.

Comment No. 520-6

I am also concerned about the fact that the developer's website shows that the production facilities are in the basement parking garage. How does that make sense? Will the basement be used for parking or will it be production facilities? Does that include production offices? I mean, it's either a basement parking garage or it's not.

Response to Comment No. 520-6

Refer to Topical Response No. 2, Definition of Floor Area is Appropriate, and Response to Comment Nos. 5-7 and 26-121 regarding the definition of floor area, how all of the proposed uses, areas and activities have been accounted for in the impact analyses in the EIR regardless of whether they meet the definition of floor area, and how no active production activities would be located in the parking and basecamp areas below Project Grade. Refer to Response to Comment No. 26-16 regarding the renderings of outdoor production activity and basecamp areas.

Comment No. 520-7

There are too many unanswered questions, and the developer has not made a real effort to win over the community. We still do not know how this project will impact the health and convenience of the community. We need to take a stand, and I hope you will take these concerns seriously.

Response to Comment No. 520-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 520-2 through 520-6.

Comment Letter No. 521

John Stamos
103 S. La Jolla Ave.
Los Angeles, CA 90048-3529

Comment No. 521-1

As someone who has lived in the neighborhood for 40 years, I've seen a lot of changes—some have been great but others, like the amount of traffic, are terrible.

Response to Comment No. 521-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 521-2 and 521-3.

Comment No. 521-2

Grove Drive is a small street, and right across from Pan Pacific Park, where people walk their dogs and families gather. Why is a huge parking structure being placed there?

Response to Comment No. 521-2

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 26-171 and 26-E.4-17 regarding access and use of The Grove Drive. As stated on page IV.H-37 in Section IV.H, Land Use and Planning, of the Draft EIR, "The Grove Drive is designated as a Collector Street in the Mobility Plan, which requires a 20-foot half-width roadway within a 33-foot half-width right-of-way. The Project would include a 3-foot-wide public sidewalk easement in addition to the 7-foot public right-of-way to provide a 10-foot sidewalk as required by the Mobility Plan. The sidewalk would include parkways extending approximately 4 feet from the back of the curb to provide planting areas for street trees, shrubs, and groundcover. Adjacent to the 3-foot sidewalk easement, an additional 4 feet would be provided to create a transition between the sidewalk and the parking structure along The Grove Drive, thus creating a 7-foot frontage area along this Project Site edge. Landscaping within this frontage area and the street parkways would incorporate existing street tree and plant selections along The Grove Drive and include species to complement those at Pan Pacific Park and the Holocaust Museum LA to the east. Refer to Section IV.K, Transportation, for a discussion of the roadway widening proposed along The Grove Drive to accommodate a northbound left-turn lane to access the Project Site."

Refer to Response to Comment No. 226-2 regarding proposed parking. Based on the Conceptual Site Plan provided in Figure II-4 of Section II, Project Description, of the Draft EIR and the application materials filed with the City, parking would be provided in a parking structure at the southeastern corner of the Project Site adjacent to the parking structure serving The Grove shopping center and in underground and surface parking. While the Conceptual Site Plan provided in Figure II-4 in Section II, Project Description, of the Draft EIR illustrates specific parking locations, ultimately, parking may be located at different locations within the Project Site, as discussed and analyzed in the Draft EIR. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 521-3

Does the Air Quality analysis show that there could be as many as 200 production trucks spewing diesel particulates in the community for years to come? Did it even consider the health risks to children and senior [sic] from the dozens of big 18-wheeler trucks on the site that will be entering Grove Dr and belching diesel exhaust in our neighborhood and next to a park?

Response to Comment No. 521-3

The first sentence of this comment is identical to a portion of Comment No. 87-1, and the second sentence of this comment is similar to Comment Nos. 87-1 and 335-3. Refer to Response to Comment Nos. 87-1 and 335-3, above.

Comment No. 521-4

I write to express my opposition to this project

Response to Comment No. 521-4

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 522

Carlos Stancic
517 N. Hayworth Ave.
Los Angeles, CA 90048-2705

Comment No. 522-1

I'm concerned about all the traffic that this will produce.

Response to Comment No. 522-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 522-2

Also, the lack of parking and the dangerous amount of emissions this will cause over a 20 year buildout.

Response to Comment No. 522-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Air quality analyses during both construction and operation of the Project have been completed, which analyzes the 32-month construction timeline, as well as the long-term buildout scenario and are included in Section IV.A, Air Quality, of the Draft EIR.

Comment No. 522-3

If the City is going to decide the scope of the TVC project on the basis of the developer's rate of return, it should also consider all of the financial consequences the developer is imposing on the community and not paying for, like the cost of physical and mental health care the community will need to deal with the consequences of the increased pollution, noise and traffic, the degradation of our infrastructure, including the streets from all of the construction and production trucks (and don't tell me the increased taxes will pay for it—

because it won't), the lost productivity of everyone sitting in added gridlock, and the adjustments that will need to be made to deal with climate change from additional GHGs.

Response to Comment No. 522-3

This comment is identical to Comment No. 114-5. Refer to Response to Comment No. 114-5, above.

Comment Letter No. 523

Sarah Stapanowich
439 N. Stanley Ave.
Los Angeles, CA 90036-2301

Comment No. 523-1

I am writing to express grave concern that your upcoming development will negatively impact the community. As an active and proud citizen of the city, I implore you to consider the adverse effects this will have on neighboring communities and citizens.

Response to Comment No. 523-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 523-2 through 523-7.

Comment No. 523-2

Transportation and Travel: I don't understand the Vehicle Miles Travelled analysis. It says it is based on a City model, but it doesn't seem to make any sense. There are assumptions about people using transportation, but where are these assumptions from? How many people take public transportation to the site today or did before the pandemic? This would be the best data. We all know that people who work in office projects don't take public transportation. Where do the people live who will work here? The EIR seems to assume they live close by, but where's the evidence supporting this? Why is Vehicles Miles Travelled limited to employees only? What about the distance that trucks and deliveries will travel? What about all the live audience shows? How far are the audience members going to travel?

Response to Comment No. 523-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Refer to Response to Comment No. 9-24 regarding the Project timeline. Also refer to Appendix FEIR-8, Details of Buildout and Construction, of this Final EIR.

Refer to Response to Comment Nos. 28-13 and 32-3 regarding noticing and opportunities for public review. As discussed therein, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project for several years. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Refer to Section C, Assumptions in the VMT Analysis, Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

Comment No. 523-3

Planning Structure: It is imperative the community is aware of the plans for this development. We should not be left in the dark and unsure about the project's time frame. What are the phases of how this project will be built?

Response to Comment No. 523-3

Refer to Response to Comment No. 9-24 regarding the Project's buildout timeline. There is no phasing plan for construction.

Project plans are part of the administrative record and are available on the Department of City Planning's website, <https://planning.lacity.org/pdiscaseinfo/>, by searching the Project's entitlement case number, CPC-2021-4089-AD-GPA-ZC-SN-SP.

Comment No. 523-4

What does the specific plan referenced have to do with the applicant's plan as analyzed in the EIR? Where are the specifics of a specific plan?

Response to Comment No. 523-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and

proposed Specific Plan, how CEQA and City policy do not require the Specific Plan to be included in the EIR, the level of detail required for a specific plan project EIR, how the Draft EIR disclosed and analyzed all physical elements of the Project in accordance with CEQA, and the regulatory process under the proposed Specific Plan, which has been made publicly available in response to comments on the Draft EIR prior to the publication of this Final EIR. As discussed in these responses, the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 523-5

Please show a phasing plan for this project so the community can know what will be built when.

Response to Comment No. 523-5

Refer to Response to Comment No. 523-3, above.

Comment No. 523-6

What is a development agreement and why would the city give a 20-year one?

Response to Comment No. 523-6

Refer to Response to Comment Nos. 9-24 and 268-2 regarding the proposed Development Agreement.

Comment No. 523-7

Environmental Safety: As a conscious group of citizens, we always seek out ways to preserve our environment. The conceptual plan shows many dozens of big 18-wheeler trucks on the site. How many trucks can be on site? Have the impacts of the trucks been fully analyzed. Does the Air Quality analysis show that there could be 50, 100 or 200 production trucks spewing diesel particulates in the community for years to come? What about the greenhouse gas emissions?

Response to Comment No. 523-7

This comment is similar to Comment Nos. 87-1 and 335-1. Refer to Response to Comment Nos. 87-1 and 335-1, above.

Comment No. 523-8

These question are important to citizens of the city and we are eager to see how these concerns will be addressed.

Response to Comment No. 523-8

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 523-2 through 523-7.

Comment Letter No. 524

Andrew Starr
8380 W. Fourth St.
Los Angeles, CA 90048-4203

Comment No. 524-1

I am concerned about the environmental impact of this project.

Response to Comment No. 524-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 524-2 through 524-4.

Comment No. 524-2

Why does development allow for excavation down 45 feet?

Response to Comment No. 524-2

As discussed in the Draft EIR, excavation to a maximum depth 45 feet would allow for the construction of the below-grade parking included in the proposed development program.

Comment No. 524-3

This is an area with tar and methane—the La Brea Tar Pits is close by. Is it possible that methane will build up and risk explosions in my neighborhood like the Ross that exploded? The EIR should evaluate the amount of harmful gases that will be released into the environment as a result of excavation.

Response to Comment No. 524-3

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of tar and methane and the associated mitigation. Response to Comment No. 13-6 also discusses the potential for methane explosions similar to the Ross incident.

Comment No. 524-4

How many trucks will it take to haul away all that dirt? Did the Draft EIR consider the impact of haul trucks spewing emissions on the community? What about the schools along the haul route?

Response to Comment No. 524-4

Please refer to Response to Comment No. 164-3 for a detailed discussion on the number of haul trucks, construction haul routes, staging areas, and idle emissions. Refer to Response to Comment No. 26-E.1-21 for a discussion of the Project's use of the 25-meter LST lookup tables. Please refer to Response to Comment No. 26-30 for a discussion of the Project's CalEEMod model accounting for all Project-related hauling. As discussed therein, potential impacts were evaluated at the closest off-site sensitive receptor, which is the residential use located directly east of the Project Site boundary. The localized impact analysis included both off-road (e.g., bulldozers, loaders, and excavators) and on-site on-road vehicles (e.g., haul and delivery truck travel and idle time). As shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with the incorporation of mitigation measures.

Construction-related trucks along haul routes would represent a small fraction of the total emissions evaluated in the air quality analysis as a truck would only be located next to a single residence or sensitive receptor, including schools, for a very short duration (traveling around 25 mph). As discussed above, the total on-site emissions would result in a less-than-significant localized air quality impact at the closest sensitive receptor. Therefore, no additional analysis of trucks along haul routes is required under CEQA.

Comment No. 524-5

Look forward to hearing back, [sic]

Response to Comment No. 524-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 524-2 through 524-4.

Comment Letter No. 525

Mike Stein
300 S. Citrus Ave.
Los Angeles, CA 90036-3036

Comment No. 525-1

As a resident of the Fairfax community, I think that some of the objectives of this project are wrong. I think that the residents, like myself, should be cared about more because it is our lives that are going to be impacted from this project.

Response to Comment No. 525-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 525-2 through 525-4.

Comment No. 525-2

First, the Draft EIR states that the developer's return on investment is a project objective. My first question is why is this an objective? Shouldn't the community be cared about more than the profit of a developer? Similarly, since it is stated an objective, please produce us with the financial information about the project. Why does the City care about how much money the developer makes? Shouldn't the City care more about the health and welfare of its residents than the developer's financial goals? The City seems to care about the anticipated return, so what is the return? What assurances is the City requiring in the event the developer walks away from the project? Why would the financial return be considered when the Alternatives are being evaluated? That does not seem right. I think it is fair to those of us living in the area to have an understanding of the financial figures.

Response to Comment No. 525-2

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR.

This comment also raises several non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 525-3

Another thing that I think needs consideration is La Brea Tar Pits. This project is just down the road from this site. Digging 45 feet across the entire 25 acre site many uncover interesting artifacts and items needing to be preserved. As it stands, the project does not have a plan in place to deal with this. What is that plan? What does it provide for if there are historic or cultural artifacts? I think it is important that there is a clear plan for these instances in order to preserved interesting findings. Please provide us with a fleshed out plan for us to comment on.

Response to Comment No. 525-3

Refer to Response to Comment Nos. 13-7 and 285-2 regarding the means by which archaeological and paleontological resources are assessed during the environmental review and addressed during Project implementation, including the ownership and disposition of any collected materials. Mitigation proposed for the Project includes plans that specify the process followed during the ground-disturbing activities for the Project.

Comment No. 525-4

And lastly, the mobility hub is going to attract a lot of people who will consider it a lighted, warm and safe place to hang out in. What does your analysis say about that likelihood? What is the City going to do about that? And what about the potential for more crime due to the hub? Please tell us how you plan on keeping us safe. Are you going to install a police kiosk? What about 24/7 police presence, not just security guards? Are there going to at least be more policemen at the mobility hub? Please provide a detailed analysis of how local authorities are going to ensure that the mobility hub does not become cluttered with crime.

Response to Comment No. 525-4

With regard to the Mobility Hub, refer to Topical Response No. 7, Mobility Hub. Refer to Response to Comment No. 16-5 and pages IV.J.2-12 and IV.J.2-13 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Comment No. 525-5

The three main points above are important for myself, and I am assuming the rest of the residents in Fairfax. Please answer all of the above in great detail to give us a better understanding of a project that is going to impact our community.

Response to Comment No. 525-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 525-2 through 525-4.

Comment Letter No. 526

Alex Stemkovsky
839 S. Curson Ave.
Los Angeles, CA 90036-4620

Comment No. 526-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 526-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 527

Liz Sterbenz
lizsterbenz@yahoo.com

Comment No. 527-1

I am writing in regard to the TVC 2050 Project, ENV-2021-4091-EIR.

I am a long-term resident of the neighborhood, having moved into this apartment 22 years ago in August 2000. I have seen the neighborhood change a great deal over the years. While there are certainly neighbors who pre-date me, and in fact grew up in the neighborhood, I have my own experience of seeing how the construction of the Grove impacted the neighborhood as it was built, as well as with the traffic it brought with it.

I have worked as a TV producer for over 25 years, both here in LA and in NYC, and in fact I've worked on several productions on the Television City lot—and really enjoyed that commute from a few doors away! I understand the importance of having updated facilities nearby, and I really do hope that Television City can remain a thriving studio far into the future.

However, I have to voice several concerns that I have about the specifics of this project, as well as issues that I feel would need to be addressed for the neighborhood in order to prevent the overspill from adversely affecting our quality of life.

Response to Comment No. 527-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 527-2 through 527-4.

Comment No. 527-2

I have serious concerns about the length of time requested for the development project. A decades long construction period seems excessive by any estimation. The idea that once construction begins, an entire generation could be born, grow up, and start a family of their own, all while living in the shadow and fallout of construction detritus—noise, dust, debris, traffic, etc.—is overwhelming. I don't understand how any group could ask that of their neighbors, and it seems that they must not care if it pushes us out.

Response to Comment No. 527-2

Refer to Response to Comment No. 9-24 regarding the Project timeline. Refer also to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the Project's construction traffic impacts under the 32-month and long-term buildout scenarios.

Refer to pages IV.I-40 through IV.I-43 in Section IV.I, Noise, of the Draft EIR for an analysis of temporary noise impacts associated with construction haul trucks.

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, including measures for the prevention of dust track-out onto public roads. Refer to Response to Comment No. 26-34 regarding the Draft EIR's analysis of emissions associated with wind-blown dirt and dust. As also discussed in Topical Response No. 14, localized air quality impacts as a result of hauling activities would be less than significant.

Refer to Topical Response No. 14 and Response to Comment No. 96-5 regarding construction trips and the proposed CTMP. The CTMP will establish requirements to control noise, dust and debris, and traffic during construction.

Comment No. 527-3

I am not convinced that there is a reasonable plan to address the amount of traffic that will be generated from this project—both during the construction, and after the completion and once the studios are open. I live on Genesee, four doors up from Beverly. I see many cars race down this street, attempting to make the green light to cross onto the lot as it stands now. I think the only way to make this a feasible plan without destroying this residential neighborhood is to make it impossible to cross onto the lot from Genesee. The residents here have also tried to get bumps/humps on the street over the years, and we've been turned down. I believe a much more comprehensive look at this neighborhood to prevent cut through traffic—and especially the cut through traffic that is speeding trying to make a light!—would help. Roundabouts in the intersections, cutoffs to prevent crossover to CBS—all of these would help. We were finally able to get permit parking on the block which was able to cut down on the audience parking which had been a long-term problem. Now, since parking is limited to two hours, the audiences are forced to follow the directions they are given by the audience coordinators, and park in the Grove lot. Previously, they would ignore these directions, and park on Genesee and surrounding blocks which were much closer for them, and they would stay for hours and hours at a time, overly taxing an already very stressed parking situation.

Response to Comment No. 527-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Appendix M.1, Transportation Assessment, of the Draft EIR includes a complete Project construction assessment as part of its non-CEQA transportation analysis (refer to Section 5D, pages 179 through 184). As discussed therein, while construction-related activities associated with the Project would result in varying levels of truck and worker trips to and from the Project Site daily, such trips would be far less than operational Project-related trips. Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Additionally, the Project would include a CTMP prepared pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 and IV.K-37 of the Draft EIR), which would include provisions to limit the amount of construction-related trips during peak hours to the extent feasible, as well as a prohibition of off-site construction worker or equipment parking.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR). Although the neighborhood may have been unsuccessful in the past at getting speed humps and traffic control devices installed on neighborhood streets, the Project's Transportation Improvement Program includes the development of a NTMP for the neighborhoods north and west of the Project Site. The neighbors, Applicant, and LADOT will work together to develop an NTMP for each neighborhood. This joint effort, supported by the Council Office, should have a better chance of getting approval for implementation if support by the neighbors can be achieved.

Comment No. 527-4

Overall, I'm not optimistic that this project will turn out well for the neighbors, but I'm hoping that the city can consider for themselves what it might be like to live next to a project that is asking to be under construction for 20—30 years, and that is promising to triple or quadruple in size the amount of people coming into an area that sees bumper to bumper traffic every morning and evening.

Response to Comment No. 527-4

Regarding the Project timeline, refer to Response to Comment No. 9-24.

Refer to Topical Response No. 10, Trip Generation, and Response to Comment Nos. 9-32 and 106-2 regarding Project trips and the number of employees and visitors.

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 527-5

I've loved living in this neighborhood, and I'm afraid that it will become an untenable situation. I'm also concerned as while I've always spent portions of my year working from home as a freelance producer, since March of 2020, I've exclusively worked remotely as many people have been doing. Between the noise of construction, and the amount of debris to be released into the environment, especially since I'm in an older apartment building with no A/C and therefore pretty much year-round open windows—I expect that my quality of life will be seriously impacted, and very likely my physical and mental health.

Again, as a TV producer, I really do understand the need for an upgraded studio facility—but it really seems like this TVC 2050 is not being a good neighbor to what is already here.

Response to Comment No. 527-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 527-2 through 527-4.

Comment Letter No. 528

Deborah Stern
6350 W. Fifth St.
Los Angeles, CA 90048-4718

Comment No. 528-1

I believe that my strong opposition to every element of this project is shared by my neighbors and the general community.

How is it that such a huge and disruptive project seems to be on a fast track when it will have such a profound impact on our neighborhood? I have lived in this community for more than 20 years and am horrified by the idea that the construction of this project is scheduled to last as long as I've been there.

Response to Comment No. 528-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 528-2.

Comment No. 528-2

I read about a settlement agreement between the LA Conservancy and the project's developer. Are the constraints from this settlement agreement considered in the EIR? If so, what is the agreement?

Is the developer paying the Conservancy? How do the settlement agreement's limitations impact the project objectives? How will development be clustered in the middle of the site if the Conservancy agreement requires setting back from the existing buildings?

More to the point, how can the City and community understand what these issues are if no one has been provided with the Settlement Agreement?

Response to Comment No. 528-2

Refer to Response to Comment No. 26-19 regarding the agreement with the Los Angeles Conservancy.

Comment Letter No. 529

Josh Stock
639 N. Poinsettia Pl.
Los Angeles, CA 90036-1926

Comment No. 529-1

What is going to be done to mitigate the different sources and times of noise? If the project could take three years or it could twenty years, that suggests construction could be ongoing for upwards of twenty years. What construction activities will occur in each of those years and generating what levels of noise? And what steps in each of those years will be taken to keep noise levels to a minimum?

Response to Comment No. 529-1

This comment is identical to Comment No. 310-6. Refer to Response to Comment No. 310-6, above.

Comment No. 529-2

Furthermore, with the number of soundstages that will be added, including outdoor soundstages, what will be the sound dampening efforts to deal with the noise once in use? What days and hours will the outdoor soundstages be allowed to operate? On what basis is it determined what days and hours of the week those outdoor stages can be used?

Response to Comment No. 529-2

This comment is identical to Comment No. 310-7. Refer to Response to Comment No. 310-7, above.

Comment Letter No. 530

Sarai Stoermer
522 N. Poinsettia Pl.
Los Angeles, CA 90036-1929

Comment No. 530-1

I hope this letter finds you well. I'm reaching out about a recent project that has come to light in the neighborhood—the TVC expansion. I'm devastated as I continue to learn about the details (although not many have been provided to the public) about this development right in my back yard.

Response to Comment No. 530-1

This comment is identical to a portion of Comment No. 125-1; nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 530-2

We have so many questions as neighbors: How do you expect all these new employees to get to work? Where do they park? Where can we park? This is going to increase the already stressed congestion in the area. How am I, as a neighbor, supposed to navigate this new congestion on the streets? Do any of you all live this area? Are you not concerned about this if you do? And if you don't live in the hub, then why do you get to make these decisions on our behalf?

Response to Comment No. 530-2

This comment is substantively similar to Comment No. 95-2. Please refer to Response to Comment No. 95-2 for a discussion of the Project's trip generation, TDM Program, and parking supply and demand.

Comment No. 530-3

Most of my neighbors, including myself, are incredibly concerned about the implications of this development. Beyond that, we have not been given the resources or information needed to fully understand how this will change our backyard, our neighborhood, our HOMES.

Response to Comment No. 530-3

This comment is identical to Comment 95-3. Refer to Response to Comment No. 95-3, above.

Comment No. 530-4

Please help us stop this project, or at least give us a seat at the table to have the conversations that are necessary. While this may not affect your day-to-day life, I hope you will see how it will affect ours. As a leader that is supposed to represent our best interest, I pray and hope that you do the same with this development. We need more leaders fighting for a better future, not just fighting for a big check.

Response to Comment No. 530-4

This comment is identical to Comment 95-4. Refer to Response to Comment No. 95-4, above.

Comment Letter No. 531

Cassio Stoltz
7803 Beverly Blvd.
Los Angeles, CA 90036-2111

Comment No. 531-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 531-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 532

Eric Stoltz
7803 1/2 Beverly Blvd.
Los Angeles, CA 90036-2111

Comment No. 532-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 532-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 533

Joe Stolz
joestolz@hotmail.com

Comment No. 533-1

Please include our votes to put this project on hold until we can review the impact.

Response to Comment No. 533-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 533-2

The Grove project has brought misery and traffic snarls to us DAILY.

Response to Comment No. 533-2

This comment provides a general statement on the traffic conditions in the area related to The Grove shopping center. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 533-3

Do we really need to ruin Beverly Fairfax for good?

Response to Comment No. 533-3

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 534

Sylvia Stone
6330 W. Fifth Street
Los Angeles, CA 90048-4718

Comment No. 534-1

I write to express my disappointment that housing was not included in the project, which is desperately needed.

Why can't a portion of the site be dedicated to housing? It's pretty clear that more and more people are going to be working remotely so there is no a need for 1.4 million more square feet of office space.

Response to Comment No. 534-1

Refer to Response to Comment No. 152-3 regarding housing.

Comment No. 534-2

My other concern is with traffic—with tens of thousands of trucks having to come up Fairfax to get to the project site, the Draft EIR should analyze the air quality, noise and other issues impacting all the sensitive uses along Fairfax. There are many schools, nursing homes and residential uses that will be impacted. The community should be notified about the incredible impacts of tens of thousands of trucks!

Response to Comment No. 534-2

This comment is similar to Comment No. 78-2. Refer to Response to Comment No. 78-2 for a discussion of construction vehicle impacts and the Notice of Availability of the Draft EIR that was published on July 14, 2022, which fully discloses the environmental impacts of the Project, including construction trucks and those related to Project operation.

Comment Letter No. 535

Etan Strauss-Cohn
313 N. Stanley Ave.
Los Angeles, CA 90036-2328

Comment No. 535-1

The Television City 2050 development plan is not for the Fairfax area. California is a state that is concerned with and has issues with environmental problems. Our state is suffering from the impact that we have put on it. Wildfires, unhealthy air qualities and consistent water issues. A lot of that stems from having developments such as the TVC 2050 project.

Response to Comment No. 535-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to the Project's Initial Study included as Appendix A of the Draft EIR for a discussion of wildfire impacts; Section IV.A, Air Quality, of the Draft EIR for a discussion of air quality impacts; and Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR for a discussion of water supply impacts.

Comment No. 535-2

The amount of traffic this project will bring will add a lot of idling emissions and potential groundwater contamination. This project will have to go deep into the ground in order to achieve some of the design features such as the basecamp and other below ground improvements to the site. I am extremely worried about the possible groundwater contamination that could happen with this site. Will there be any ways the developer could go around constructing this development without having to blast? Are there plans to do additional hydrology studies to prevent running into any underground water ways and what would those look like? As a state that is concerned with environmental concerns I would hope that the city and the developer would take a longer look at the potential impact of this development.

Response to Comment No. 535-2

Refer to Response to Comment Nos. 13-4, 13-6, 16-28 and 26-E.3-4 regarding the Draft EIR's analysis of groundwater quality. See Response to Comment Nos. 3-7 and 11-5 for a discussion of dewatering as it relates to groundwater quality. With regard to whether it would be possible to avoid encountering groundwater, it would not be. As discussed on page IV.F-44 of Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, recent borings on-site have encountered groundwater at depths ranging from approximately 10 to

30 feet, with a historic high groundwater level of approximately 8 feet bgs, and Project excavation for below grade parking would extend to a maximum depth of approximately 45 feet. As such, it is not anticipated that the Project could avoid encountering groundwater during construction. With regard to whether blasting is necessary, as described in the Preliminary Geotechnical Engineering Investigation, Addendum I—Response to Soils Report Review Letter (Geotechnical Addendum I), and Addendum II—Additional Geotechnical Comments (Geotechnical Addendum II), all prepared by Geotechnologies, Inc. and provided in Appendix E of the Draft EIR, the Project Site is underlain by variable, semi-consolidated to consolidated alluvial sediments, including combinations of clays, silts and sands. Based on the available subsurface soil data, the excavations are expected to be suitable for heavy excavation equipment and will not require blasting.

Refer to Response to Comment No. 126-2 regarding truck idling.

Comment No. 535-3

Another issue I have is the methane that is in this area. If you live or visit this area frequently you can find a methane alarm in almost every building you go into. We clearly have a lot of methane present in the area. Does the DEIR address this issue? Not only is this an environmental concern but this is also a public safety issue. What if during construction the crews hit a high methane area and the cause and explosion? Is there an issue that it could cause a methane leak into the local business that would make them have to close the business down for a day or two? This is a serious issue as a lot of the businesses are still trying to recover from the impacts of Covid and not being allowed to open their doors or have as many customers. Could we do a study as to what the impact of a methane leak would have on a business that would have to shut down? Surely there are some businesses that are barely surviving and need to be open as much as they can. Closing down would not be beneficial to them at all. We need to prioritize smaller businesses over a billion-dollar industry. I hope that we can address all of these concerns before moving forward with this project.

Response to Comment No. 535-3

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane and its mitigation. With regard to the closure of nearby businesses, this is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 536

Ash Stuck and Tim Scales
542 N. Harper Ave.
Los Angeles, CA 90048-2223

Comment No. 536-1

We are resident of the Fairfax area and have several concerns.

Response to Comment No. 536-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 536-2 through 536-4.

Comment No. 536-2

1. Traffic. This project is so huge. We live in LA so we are accustomed to traffic. But this is too much construction and too many people too quickly. The EIR doesn't even seem to discuss traffic and congestion at this point. It talks about miles to travel to work, but we all know an LA mile is different from anything else. Where is the actual analysis of how all the additional traffic we know will result from the project is going to impact congestion, gridlock and bottlenecking? What are the measures to address the added back-up of traffic on the streets in and around the project? Why didn't the city study what will be the actual impacts, using the planned number of additional workers, staff, people visiting, and all that additional driving, rather than estimates of miles traveled based on some other "similar" workplace?

Response to Comment No. 536-2

As discussed on page IV.K-1 of Section IV.K, Transportation, of the Draft EIR, with the passage of SB 743, the analysis of transportation impacts shifted from driver delay (i.e., LOS) to VMT. Therefore, impact thresholds relative to changes in driver delay are no longer applicable to identify transportation-related impacts under CEQA. As discussed on pages IV.K-72 through IV.K-78 of the Draft EIR, impacts related to VMT would be less than significant. Specifically, in the case of the Project, the work VMT trip per employee target was 7.6 work VMT per employee and the analysis of the Project showed that it would generate 6.7 work VMT per employee as shown in Table 13 (page 122) of the Transportation Assessment (Appendix M.1 of the Draft EIR). Since the Project work VMT per employee falls below the target for the Central APC area, the Project is determined to have no significant VMT impact. Notwithstanding, upon the Project's anticipated

completion in 2026, several intersections on arterial streets would operate at LOS E or F, before and after the addition of Project vehicles. The Project would not cause any location to change from LOS D or better to LOS E or F during morning or afternoon peak hours. Refer to Topical Response No. 8, Vehicle Miles Traveled, regarding the CEQA VMT and the Project's less-than-significant impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 536-3

2. Methane Pockets. I remember the 1985 explosion at the Ross store from a methane pocket under the store. I've always been concerned when new big projects get built around here and dig into the ground. This is a methane zone. What will this project do to avoid hitting a methane pocket when they dig below the surface for the parking garages? Also, when I looked at the Hazards section of the EIR, it talked about methane gas pockets, but all of the mitigation seemed to be for the people on site. This is a family neighborhood. If an explosion were to happen in the neighborhood due to hitting a methane pocket, what is the response plan? How will people be evacuated from the area? How will people be alerted to a potential danger? Is there a compensation plan in case of an accident? There seems to be mitigation measures for the workers, but the EIR doesn't look outside of the site. Please explain the plan to keep my neighborhood safe.

Response to Comment No. 536-3

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane and its mitigation. Response to Comment No. 13-6 also discusses the potential for methane explosions similar to the Ross incident.

With regard to evacuation, a health and safety and monitoring plan will be in place to evaluate and address safe methane levels during construction as required by Mitigation Measure HAZ-MM-2. In addition, LADBS and LAFD are responsible for reviewing, approving and oversight of contingency and emergency procedures required under the City of Los Angeles Methane Code ordinance. The procedures include development of an Emergency Plan with procedures that must be approved by the LAFD.

Comment No. 536-4

3. Hydrocarbons. The La Brea tar pits are nearby the project, and the EIR says that digging will encounter natural pockets of methane, oil and other hydrocarbons. These are awful for air quality in the area. How will the project make sure the community isn't impacted by the toxics and chemicals that will be uncovered in the soil? What are the health risks to the community? Where is

the information about those risks and what steps will be taken to reduce those very real risks. None of these questions have been answered.

Response to Comment No. 536-4

Refer to Response to Comment Nos. 13-4, 13-6, and 16-28 for a discussion of the presence of methane, oil, and hydrocarbons and the associated mitigation.

Comment No. 536-5

There are too many lingering questions to let this project continue. I thank you in advance for listening to the community.

Response to Comment No. 536-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 536-2 through 536-4.

Comment Letter No. 537

James Sugahora
437 S. Orange Dr.
Los Angeles, CA 90036-2611

Comment No. 537-1

I am submitting comments and questions about the plan to modernize and develop Television City.

Response to Comment No. 537-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 537-2

I have several questions about the extent of the excavation. The La Brea Tar Pits are very close by.

- Will the excavation release gases into the environment? What gases are going to be released, and what is the city and the developer going to do about that risk? What about the effects to the public, to visitors, and to those who live in the area?
- Did the EIR study how much gas would be released? What were those findings? Where is that located?

Response to Comment No. 537-2

This comment is identical to Comment No. 211-2. Refer to Response to Comment No. 211-2, above

Comment No. 537-3

I am also really concerned this excavation will have a negative impact on the groundwater and drinking water.

- Did you study the impact of any excavation on water? What was the result of that study?

- Will my property in the Beverly Fairfax neighborhood be impacted by removing groundwater?
- Will I be notified if my property is impacted? What will be done to ensure no damage to my property?
- How much groundwater will you be removing? Where will it be pumped to?

Response to Comment No. 537-3

This comment is identical to Comment No. 211-3. Refer to Response to Comment No. 211-3, above.

Comment No. 537-4

I am also wondering why the EIR says that what is being planned for below ground is not part of the floor area? Construction and operations below ground will have impacts.

- Can you define floor area in the context of this project? Why would basement and below ground areas not be considered floor space? That doesn't make any sense, but does sound as though it allows the developer to not disclose the impacts.
- What will the operation and construction impacts be from any buildings, area, and space that the EIR says are not considered part of the square footage?

Response to Comment No. 537-4

This comment is identical to Comment No. 211-4. Refer to Response to Comment No. 211-4, above.

Comment No. 537-5

I look forward to reviewing your response.

Response to Comment No. 537-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 538

Bob Sullivan
bobs2000@hotmail.com

Comment No. 538-1

I support a responsible, well-designed, and well-scaled renewal of Television City that respects its historic assets.

Response to Comment No. 538-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-2

I have some concerns with respect to the TVC 2050 Draft EIR.

Response to Comment No. 538-2

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Response to Comment Nos. 538-2 through 538-29.

Comment No. 538-3**General Comments**

The draft EIR enumerates various project approvals that are required. What is the timing of actions that will take place subsequent to this Draft EIR? How will these actions be scheduled? How will the public be informed? Which ones will involve public meetings?

Response to Comment No. 538-3

Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers, including the City Hearing Officer and Deputy Advisory Agency, the City Planning Commission, the Planning and Land Use Management Committee, and the City Council with input from the City Attorney's office. The public will have additional opportunities to comment on the Project at any of these upcoming hearings and meetings. Noticing for the

public hearings will be conducted in accordance with all applicable City and State noticing requirements.

Comment No. 538-4

How would the Specific Plan, design and sign standards be implemented from the city's point of view? Will it involve staff and/or some review board operating at a public hearing? Will the cultural heritage commission review occur at every step of the way? Is there a time limit to the Specific Plan?

Response to Comment No. 538-4

This comment does not relate to the Draft EIR's analysis of environmental impacts; however, a response is included below for informational purposes. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As discussed in Section B, Historic Structure Report and the Future Preservation of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, any alteration to the HCM would require OHR review and compliance with the Rehabilitation Standards pursuant to Section 22.171.14 of the Cultural Heritage Ordinance.

The proposed Specific Plan and proposed Sign District are discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan. Refer to Topical Response No. 1 for a discussion of the regulatory framework under the proposed Specific Plan. Refer to the Preliminary Draft Specific Plan which has been made publicly available on the Department of City Planning's website for informational purposes prior to the release of this Final EIR. Please note that this draft is not final and has not been approved by City decision-makers (it will be reviewed by City decision-makers following the publication of this Final EIR).

Comment No. 538-5

What all does a development agreement entail? Does it require a single ownership for the entire site? Does it still apply if the property should change ownership? What happens after the agreed upon time expires?

Response to Comment No. 538-5

Refer to Response to Comment No. 9-24 and 16-22 regarding the Development Agreement. As stated throughout the Draft EIR, the Development Agreement would confer a vested right to develop the Project in accordance with the approved Specific Plan and

Mitigation Monitoring Program throughout the term of the Development Agreement. The approved Specific Plan and Mitigation Monitoring Program would continue to regulate development of the Project Site and provide for the implementation of all applicable PDFs and mitigation measures associated with any development activities during and beyond the term of the Development Agreement.

Comment No. 538-6

I question whether the City Planning Director should be the only one to make decisions about land use exchange within the Specific Plan. I think that this should be something handled in a public hearing. The design standards and master sign plan and any revisions should also be considered in a public hearing. The implementation of a city design review board is indicated.

Response to Comment No. 538-6

As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, the proposed Specific Plan includes a regulatory framework for implementation of the Project, including, among other things, a discretionary process for future changes that are substantially different than the Project, including a proposal that involves a land use exchange. However, the procedures discussed in this comment do not represent environmental issues and are outside the scope of this EIR.

No decision has been made on the Project. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers, including the City Hearing Officer and Deputy Advisory Agency, the City Planning Commission, the Planning and Land Use Management Committee, and the City Council with input from the City Attorney's office. The public will have additional opportunities to comment on the Project at any of these upcoming hearings and meetings. Noticing for the public hearings and meetings will be conducted in accordance with all applicable City and State noticing requirements.

Comment No. 538-7**Aesthetics/Cultural Resources**

The original Television City building has significant architectural and design importance. It is more than just facades and surfaces to be seen from Beverly Boulevard. It is a three-dimensional mass, it has eye catching contrasts of black and white colors, along with red trim.

The proposed office towers and bridge over the historic building are overpowering and dwarf the historic resource. They are not in scale with it.

Response to Comment No. 538-7

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, and Response to Comment No. 26-E.2-6. As discussed therein, the Draft EIR fully analyzed potential impacts to the Primary Studio Complex from new adjacent construction and a rooftop addition and concluded that impacts would be less than significant.

Comment No. 538-8

Streetscape is an important aspect of urban design. Grove Drive already has a parking structure fronting it at The Grove shopping center. I don't think it needs another one. The streetscape needs some variety.

Response to Comment No. 538-8

Refer to Response to Comment Nos. 16-72, 28-18, 172-3, and 313-2 regarding the Project's pedestrian-oriented design and public realm improvements.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-9

I for the life of me cannot understand why parks are so poorly regarded in this city. The Grove shopping center has no orientation to Pan Pacific Park. The proposal here to place another parking structure facing the park makes no sense. Why not have an office building that faces the park so that workers could have some nature to view?

Response to Comment No. 538-9

This comment does not raise issues related to CEQA or the environmental analysis included in the Draft EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-10

A fence along Beverly Boulevard that one can see through to the original building should be used. The view of the original building should not be impaired between the two main driveways along Beverly. The landscaping there should be ground cover, no high bushes

and no trees. From the preliminary plan it looks like this is the proposed location for some small buildings. This is not in keeping with the intent of the viewshed restoration area.

What is permitted within the viewshed? There needs to be a clear and unobstructed view of the historic building for the length of the view shed. Why is the viewshed in a zone designated with a 58 foot height limit? There should be no buildings in it. Buildings and high landscaping may not improve upon the situation that currently exists.

Response to Comment No. 538-10

Refer to Section C, Potential New Construction North of the Primary Studio Complex, of Topical Response No. 5, Historical Resources, regarding the regulations and review process for new construction in the Viewshed Restoration Area. As discussed therein, the Project would enable unobstructed views of the Primary Studio Complex from Beverly Boulevard, thereby restoring an important character-defining viewshed feature that has been compromised.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-11

Air Quality/Noise

The complete switchover to electric vehicles is still years away. Meantime, I am concerned particularly with diesel powered vehicles operating on the lot during construction. The exhaust can affect nearby neighborhoods. In addition, what is to keep dust from flying off the dump trucks along their route through the city? After construction is complete, what about diesel powered vehicles, both going to and from their parking spaces as well as idling. Diesel powered generators should be prohibited on the site, especially in the underground base camps. Electrical hookups need be provided.

Response to Comment No. 538-11

As discussed on page IV.A-17 in Section IV.A, Air Quality, of the Draft EIR, SCAQMD Rule 403—Fugitive Dust would require the use of BACT for dust control, which includes mandatory control actions and dust control contingency measures to control fugitive dust and would serve to reduce dust from trucks along haul routes. Refer to Response to Comment No. 26-E.1-2 and 123-3 regarding the analysis of DPM emissions. As further discussed on page IV.A-72 in Section IV.A, Air Quality, of the Draft EIR, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery and haul trucks)

to idle for no more than five minutes at any given time, which would further limit diesel exhaust emissions. Please refer to Response to Comment No. 164-3 for a detailed discussion on the number of haul trucks, construction haul routes, staging areas, and idle emissions. Refer to Response to Comment No. 26-E.1-21 for a discussion of the Project's use of the 25-meter LST lookup tables. Please refer to Response to Comment No. 26-30 for a discussion of the Project's CalEEMod model accounting for all Project-related hauling. As discussed therein, potential impacts were evaluated at the closest off-site sensitive receptor, which is the residential use located directly east of the Project Site boundary. The localized impact analysis included both off-road (e.g., bulldozers, loaders, and excavators) and on-site on-road vehicles (e.g., haul and delivery truck travel and idle time). As shown in Table IV.A-11 on page IV.A-74 of the Draft EIR, localized air quality impacts would be less than significant with the incorporation of mitigation measures.

Please refer to Response to Comment No. 26-E.1-16 regarding the number of Project-related operational trucks accessing the Project Site per day. As shown therein, the truck trips (approximately 31 total net new diesel trucks) is substantially less than the 100 trucks criteria cited in the Draft EIR that would trigger the need for a mobile air toxics HRA (see page IV.A-72 of the Draft EIR). This information further supports the Draft EIR's conclusion that Project-related TAC emission impacts during operations would be less than significant and would not result in a potential health risk impact.

Refer to Response to Comment No. 26-36 regarding power generators and basecamp power.

Comment No. 538-12

How are the underground parking areas to be ventilated? What about noise and pollution from mechanical venting? Where will the vents be placed on the site? Will these be unsightly? Will the noise be heard from public areas?

Response to Comment No. 538-12

Ventilation for underground parking areas will comply with Section 120.6(c) of the California Building Code, Mandatory Requirements for Enclosed Parking Garages, which mandates a minimum flow rate of 0.15 cubic feet per minute per square foot when the structure is scheduled to be occupied. The placement of exhaust fans inside the parking structure will allow for energy efficiency and minimize potential noise from the mechanical equipment. Venting is also typically run vertically through the parking structure and out through the top level of the parking structure. Please refer to Response to Comment No. 26-28 regarding potential emissions related to parking operations.

Comment No. 538-13**Geology and Soils/Hazards**

Will the older buildings on the site be seismically retrofitted and have asbestos removed?

Response to Comment No. 538-13

To the extent that existing structures are removed or renovated, asbestos-containing materials will be abated in accordance with applicable legal requirements and Project Design Feature HAZ-PDF-6. With regard to seismic retrofitting, no structural retrofit activities have been completed. As such, all seismic retrofitting for the existing buildings will conform with jurisdictional and departmental required laws and regulations as necessary.

Comment No. 538-14

What effect would the shallow water table have on the underground parking? Will pumps be installed?

Response to Comment No. 538-14

Temporary construction dewatering, including a temporary system of pumps, will be required for excavations that will extend into the groundwater table. Refer to Response to Comment Nos. 11-5 and 11-25 regarding the Draft EIR's comprehensive analysis of potential dewatering impacts and the Dewatering Report in this Final EIR (Appendix FEIR-13 of this Final EIR). As discussed therein, impacts related to dewatering would be less than significant. The proposed below-grade parking structures will be designed to resist the hydrostatic pressure, such that a permanent dewatering system (post-construction dewatering) will not be required. The temporary construction dewatering pump system will be removed following completion of the underground parking garage construction.

Comment No. 538-15**Land Use and Planning**

The proposed merger of subdivided land makes sense, But [sic] what is meant by re-subdividing? Is the merged site then going to be divided up into a different configuration and for what purpose? Is the intent to sell off portions of the site?

Response to Comment No. 538-15

The Project includes a Vesting Tentative Tract Map submitted for various purposes, including, but not limited to, the merger and re-subdivision of the Project Site and to facilitate the annexation of an approximately 0.63-acre portion of the Project Site located in an unincorporated area of the County of Los Angeles.

A merger and resubdivision is a land development process identified in LAMC Section 17.10.1 and allows for existing parcels to be merged and redrawn under procedures detailed in the Subdivision Map Act and the LAMC. In the case of the Project, four (4) unique parcels each with their own Assessor Parcel Number (i.e., 5512-001-003, 5512-002-002, 5512-002-001, and 5512-002-009) will be merged together along with a portion of over-dedicated public right-of-way (as determined by the Department of Public Works) and resubdivided into three (3) Lots as shown on Vesting Tentative Tract Map No. 83387. Layout and configuration of a subdivision is regulated by the Subdivision Map Act and Article 7 of Chapter 1 of the LAMC but itself is not a CEQA issue unless the merger or subdivision of land itself results in new development rights.

The Project includes a proposed Specific Plan, among other entitlements, which would regulate the land uses, physical construction, and certain operational characteristics of the Project. Further, a project's economic effects, including on the purchase and sale of property, are not effects on the environment under CEQA (see Section 15131(a) of the CEQA Guidelines). Although factors other than environmental impacts may be considered by the decision-makers, the purpose of an EIR is to focus on a project's physical environmental effects as required by CEQA. Accordingly, configuration of the subdivision is itself not a CEQA issue and therefore is not analyzed in the Draft EIR.

Comment No. 538-16

Why is it proposed that this site be designated Regional Center Commercial? Why not industrial? The main purpose of this location is manufacturing with associated office. Any commercial uses are ancillary to the main function.

Response to Comment No. 538-16

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

Contrary to the comment, the main purpose of the Project is to continue the existing studio operations at the Project Site. As discussed in Topical Response No. 3, Permitted On-Site Uses, and Response to Comment Nos. 5-6 and 28-6, the proposed Specific Plan would only allow five studio uses—sound stage, production support, production office,

general office, and retail—as well as related ancillary uses that support the studio and the five permitted uses, all of which were fully disclosed and analyzed in the EIR. The Project does not include any non-studio manufacturing uses. Mills and set/façade manufacturing associated with production activities would be permitted under the production support use; refer to page II-16 of the Draft EIR.

Comment No. 538-17

With regard to the proposed Specific Plan designation, I have concern [sic] about floor area exchanges between different uses. This is first and foremost a production facility and not an office park. I would be opposed to any studio and production support areas being allowed to be traded for general office uses. There are existing and proposed general office buildings nearby on Wilshire Boulevard.

I don't want the numerical figure for general office area to become an absolute entitlement.

The proposal articulates several categories of use and total square footage for each of those uses. How were these figures derived? The applicant has done some detailed work to arrive at these figures. This detail is thus far lacking in the public documents. Further, where is the square footage of each use distributed around the site?

The proposal increases the area devoted to sound stages, but with less production support area than is used by the stages that currently exist. Why is this so?

Response to Comment No. 538-17

Refer to Response to Comment No. 489-5 regarding the Project's studio purpose and the studio office uses.

Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 9-12, and 9-14 with regard to the Project Description and proposed Specific Plan, including a discussion of the proposed development program that was analyzed in the Draft EIR, which is based on the architectural plans on file with the City, the regulatory process in the proposed Specific Plan, and the Land Use Exchange Program. As discussed therein, the Land Use Exchange Program would not allow increases in office floor area.

Refer to Response to Comment Nos. 9-13 and 26-16 regarding the mix of studio uses.

Comment No. 538-18

Some shows may not need or desire full-fledged base camps, especially those that have occupied the historic building for decades. In lieu of relying completely on base camps, some additional built space could be provided in a new level on top of the new stages on the west and northeast parts of the site. It could provide some flex spaces, dressing rooms, hair and makeup spaces, rehearsal areas, production offices, and additional space into which to move. This could reduce the need for temporary buildings like those that currently litter the site. Such a level could be set back from the stage wall.

There are four stages proposed for the northeast corner. There is no immediate adjacent production support space depicted on the proposed site plan for the two most easterly stages.

In addition, all of the stages proposed for the northeast corner of the site could have an enclosed backstage area between them.

Elevators may be used to ferry items from trucks in the basement to the stage level. It is much more convenient for trucks to offload sets, light trusses, audience bleachers, etc., directly at each stage's elephant doors, and even enter the stage itself. This may require room for the truck to back in. The proposed building immediately west of the historic building may restrict the space to do this.

Response to Comment No. 538-18

This comment provides the commenter's suggestions about the Project but does not discuss the analysis of the Project's environmental impacts contained in the Draft EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-19**Parking**

1,510 parking spaces have been identified as existing on the site. Are all of these currently available, or some occupied by temporary office and dressing room structures? In addition, how many spaces are available to Television City personnel at The Grove parking structure? Are there seasonal or other restrictions on the use of these spaces?

Response to Comment No. 538-19

The approximately 1,510 existing parking spaces on the Project Site are available for employee and visitor parking. Similar to any dynamic production studio campus, surface parking lots are occasionally used for temporary set storage and basecamp areas, but these parking lots can be used for parking during instances where additional parking is needed.

There are no spaces at The Grove parking structure reserved for existing TVC employees. The Project Site would have sufficient parking to accommodate the audience parking demand on-site. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment No. 538-20

I sense that the scope of this project hinges on a substantial use of tandem parking. A tandem space includes space for two or more cars in a head-to-tail arrangement. Only one car would have immediate access to a travel lane. Of these, how many are on the inside without immediate lane access?

Response to Comment No. 538-20

The final parking design will be determined during the City's regulatory building permit process, but the comment is correct that tandem parking may be utilized. Tandem parking of employees and visitors would require some level of attendant parking to assure access to the inside parking spaces.

Comment No. 538-21

If no tandem parking arrangements were to be allowed and all spaces required to have immediate lane access, how many total parking spaces would remain? This could have an effect on how much of this project could be developed.

Response to Comment No. 538-21

Tandem parking is a common practice in large, underground and above-grade parking structures. Automated parking is another possibility for parking facilities on the Project Site. The issue of "immediate lane access" as cited in the comment affects the design and operation of tandem or automated garages more than it affects the overall capacity of the garage. Parking facilities with tandem spaces have to maintain a group of attendants large enough to move the blocked spaces to the aisles when needed. Likewise, the automated parking structures have to be designed with enough vehicle

loading/unloading areas to move the anticipated flow of vehicles to/from the parking spaces. Neither of these factors would limit the capacity of the garage if the garage were properly designed and staffed. A requirement, such as the one described in the comment, would be extremely unusual and not required to mitigate any CEQA impact.

Comment No. 538-22

Why do parts of the site have two levels of underground parking and others three levels?

Response to Comment No. 538-22

As discussed above, the final parking design will be included in the detailed construction plans during the regulatory building permit process, but the Project Site itself slopes downward from northeast to southwest so the topography of the Project Site itself suggests that different underground parking levels in different areas of the Project Site would minimize excavation.

Comment No. 538-23

Why is there no parking proposed under the new stages on the northeast part of the site?

Response to Comment No. 538-23

Sufficient parking could be developed on-site without adding underground parking below the northeast portion of the Project Site. Parking could be developed under active sound stages but isolating the sound stage from the potential noise and vibration effects of underground parking would make the parking under sound stages more expensive to construct.

Comment No. 538-24

Studio Audiences

The EIR does not address the issue of studio audiences.

People in a studio audience are more than likely to come by car. A few may arrive on foot from nearby neighborhoods, some dropped off by car or come via public transit. Groups may arrive by private chartered bus.

At present, no audience parking is provided on site. Currently, audience members gather on sidewalks along Fairfax Avenue for shows in the original building. They gather on Beverly Boulevard for shows produced in the East Studio Building. There are times when the two studios in the latter building have shows with audiences going on at the same time.

Is parking going to be available onsite for cars and private buses? If so, where is the entrance going to be for that? Will there be different entrances depending on whether a car or private bus is used? Will the mobility hub be used for such buses?

After parking their cars or leaving private buses, where will audience members go to line up, check in and go through security? Where will those who get there by other means line up and check in?

Is there going to be a central studio audience gathering location? Will there be different locations depending on how people arrive and where the destination studio is located on the lot?

Will studio audiences be queuing up on the public sidewalk or onsite? If on the sidewalk, the audience members could get in the way of people otherwise using the sidewalk to get from one place to another.

Most TV shows overbook the number of people in an audience in order to insure that enough people show up. In the event that someone is bumped, they would need to have easy access to their car in order to leave. Tandem parking for studio audience members is not feasible.

Many shows in the East Studio Building have as many as 600 people in their audiences. In the original studio building, Studio 33 seats up to 350 people for the Price is Right and Real Time.

A good source of information on audience sizes might be audience booking companies such as On Camera Audiences and 1iota.

If onsite car parking is not going to be available, will vouchers be given for free parking at The Grove parking structure? If The Grove parking structure is going to be used, people are likely to try to access Television City using the Grove Drive entrance, or even queue up on the sidewalk outside of it. The proposed width for the sidewalk adjacent entrance is not sufficient for safe gathering. People are likely to step into the street as they wait to get onto the lot. In preliminary drawings, a wide east-west running sidewalk on the lot is depicted. Unfortunately, its use is partially blocked by a power substation. Could that be located elsewhere?

Los Angeles traffic is unpredictable, and so people who will be in a studio audience may leave home early in order to be on time. Sometimes they may arrive early. How do you handle early arrivals? Will they be told to go drive around for awhile?

For some shows, such as the Price is Right, audience members will form a line on the sidewalk at very early hours of the day.

At studio audience gathering areas on the lot, there is need for rain, sun and heat shelter, seating, and rest rooms. Perhaps the ground floors of the office buildings at the northwest and northeast corners of the lot could be used for this purpose. Further, there is need for easily accessible rest rooms for studio audience members at each sound stage. The use of porta potties looks tacky and would not be in keeping with the quality of this project.

Response to Comment No. 538-24

Audiences were considered as part of the transportation analysis. With respect to modes of travel, the comment is correct that most audience members are expected to arrive by private vehicles. It has been assumed that approximately 90 percent would arrive by private vehicles and approximately 10 percent would arrive either on the TVC shuttle from the Metro D (Purple) Line Wilshire/Fairfax Station or via vehicle drop off at the Mobility Hub. Charter buses for audiences are rare.

With respect to parking, under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Nevertheless, audience parking would be provided on-site. Audience members would be directed to one of the three signalized entrances to enter the Project Site, and then they would be directed to parking areas for that specific show. Audience members arriving via shuttle, drop off, or via private bus would check in through a pedestrian area at the Mobility Hub. With respect to audience staging and amenities, an audience staging area and check-in facility is planned in the vicinity of the Mobility Hub where audience members would be greeted and screened for entry into the Project Site. It is not anticipated that the perimeter public sidewalks would be used for audience staging. A secondary audience staging area may be planned in the proposed open space area along Beverly Boulevard to serve sound stages in that area of the Project Site. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation, and Topical Response No. 12, Safety and Congestion, regarding audience shows, trips and access.

The remainder of this comment discusses several non-CEQA issues. Nevertheless, this comment is acknowledged and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. 538-25**Transportation**

I would like to see a real time animated simulation of traffic throughout all peak traffic times on the abutting streets and site driveways. I am concerned that the addition of traffic lights on Fairfax Avenue and The Grove Drive could slow all traffic down on both streets. Fairfax Avenue and Third Street already is highly congested.

What is to physically prevent people from making left turns from Beverly Boulevard into the most westerly driveway on the site? What is to physically prevent people from making left turns from Fairfax into the most northerly entry and most southerly entry to the site? What physically prevents a driver from making a left turn onto Fairfax Avenue from the most northerly and most southerly driveways along that street.

Response to Comment No. 538-25

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Notwithstanding, the additional signalized entrances to the Project Site are expected to operate at LOS B as reported in Table 18 on page 162 of the Transportation Assessment (Appendix M.1 of the Draft EIR). This indicates that these traffic controls will not add to congestion along The Grove Drive or Fairfax Avenue.

Turn prohibitions into the intended right turn in-and-out driveways would be controlled by pavement marking and signs prohibiting the movements in question.

The remainder of this comment discusses several non-CEQA issues and issues that are not specific to the Project. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-26**Sidewalks**

There is growing interest in sidewalks providing a pleasant experience for pedestrians. This requires that sidewalks are wide and comfortable for two people to walk together in

each direction at the same time on commercial streets. The sidewalks on all perimeter streets should be at least 15 feet wide.

Grove Drive may be classified as a collector and as such have certain standards, for width, sidewalk dimensions, etc. This classification does not address the reality of this situation. Currently the sidewalk is too narrow for residents of the neighborhoods to the north and the Broadcast Center Apartments to easily get to The Grove and other stores nearby.

Response to Comment No. 538-26

As part of the Vesting Tentative Tract Map, the Advisory Agency, in consultation with the Bureau of Engineering and Department of Transportation, will determine appropriate right-of-way, roadway, and sidewalk widths. Refer to Response to Comment Nos. 16-30, 16-72, and 16-76 regarding sidewalk and frontage widths. Refer to Response to Comment No. 521-2 regarding access and the use of The Grove Drive.

Comment No. 538-27

The Beverly Boulevard sidewalk will provide a pleasant view of the historic building. I am concerned about the view on Fairfax Avenue. The wall depicted in the preliminary sketches gives a fortress like appearance. It could also be a convenient target for taggers. More work needs to be done on the design of that.

Response to Comment No. 538-27

Refer to Response to Comment Nos. 9-17, 16-72, 28-18, 172-3, and 313-2 with regard to the Project's pedestrian-oriented design and public realm enhancements, as well as the design standards that are part of the proposed Specific Plan.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-28

Design Standards

Will there be a chance for public comment on the design standards?

New buildings should keep with the standard established by the historic building. Studio facades should be white concrete and/or have black decking. Elephant doors should be black in color. Red trim should be used. Cylindrical columns should be considered.

The facades of the office buildings are important. They need to function as a background and not distract from focus on the main building. No staggered windows should be used. In addition, no striped facades with windows alternating with vertical white striped areas should be used. These standards need to also apply to facades that face Fairfax Avenue.

Response to Comment No. 538-28

Refer to Response to Comment Nos. 538-3, 538-7, 538-10, and 538-27.

The commenter's opinions about the Project design are noted for the administrative record and have been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-29

Signs

Will there be a chance for public comment on the sign plan?

The Television City location is not in downtown Hollywood or Las Vegas. This is a more subdued area. Signage needs to be appropriate for this neighborhood.

Purpose

Signage that can be seen from the street should be used only for identification, direction and not for advertising purposes. There should be no distractions for drivers along Beverly Boulevard and Fairfax Avenue. There is enough for them to deal with to drive safely.

Design standards need to apply even to signs that are not readily seen from the street. I am concerned about the south elevation of the new studio block along Fairfax Avenue.

Tenants

Except for tenants in the commercial space on Beverly Boulevard, no tenant signage should be allowed. The exception may be a major tenant, or company that has a long-term lease on the entire site.

Location

No signs should be mounted on rooftops.

No signage should be allowed in landscaped areas.

The main design feature of this development is the architecture. Signage should never be used to compensate for weak design. Further, it should work with the design feature where it is situated. It should not look like it has been applied as an afterthought, as in the example of the “Netflix” sign on one of its Hollywood office buildings.

No signage should be allowed on the facade of the historic building, unless CBS should become a major tenant.

Type

No billboard type signage should be allowed. This includes those that incorporate into windows.

No banners should obscure windows.

There should be no pole signage, or freestanding signs, except for the Television City vehicular entrance signs.

In no case should there be internally lit cabinet signs with Plexiglas faces. No signs should extend perpendicular from a wall.

There should be no signs mounted on external raceways that stick out from the building wall.

There should be no visible electrical conduits or junction boxes. There should be no signs with animation.

For commercial businesses with direct access from the sidewalk, signage needs to be subdued. The sign needs to be immediately above the entrance, or to the side. Consider using signage that consists of individual reverse pan channel letters with halo illumination. The sign for the Television City Mobility Hub depicted on the TVC 2050 website provides a good example of the use of this type of sign.

Response to Comment No. 538-29

Refer to Response to Comment No. 538-3 regarding opportunities for public input on the Sign District.

Refer to Response to Comment Nos. 5-10 and 26-129 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square

footage, illumination, etc.) that were described in the Draft EIR in accordance with CEQA and City policy.

The commenter's opinions about the Project signage are noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 538-30

I appreciate the opportunity to comment., [sic]

Please keep me on the notification list for future phases and opportunities to comment on the TVC 2050 project.

Response to Comment No. 538-30

All commenters are added to the notification list for the Project. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 539

Otto Svoboda
2576 Nicholas St.
Simi Valley, CA 93065-1515

Comment No. 539-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 539-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 540

Kenya Swaye
4507 N. Radnor Ave.
Lakewood, CA 90713-2550

Comment No. 540-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Response to Comment No. 540-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 541

Fiona Tagliente
359 1/2 N. Gardner St.
Los Angeles, CA 90036-5722

Comment No. 541-1

I am a concerned resident of the Beverly Fairfax community. After learning more about the Television City project and its Draft Environmental Impact Report, I felt led to voice my opinions and concerns. I have listed several questions I have about the project, and I am hopeful that the city and the developer will take the time to read and thoroughly answer each of them.

Response to Comment No. 541-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 541-2 through 541-4.

Comment No. 541-2

Primarily, I am worried about the presence of hundreds of construction trucks in my neighborhood. The conceptual plan shows that tons of 18-wheeler trucks can be on the project site at any one time. The conceptual plan, however, fails to tell neighbors how many there will be. Will there be 15? 50? 100? Will they all be 18-wheelers, or will there be dump trucks as well? Where will they park? What hours will they be driving to and from the property? Will their parking spaces be visible from residential property lines? I am concerned about the eye-sore that this many trucks in my neighborhood would create, especially if this project takes 20 years to complete.

Response to Comment No. 541-2

This comment is identical to Comment No. 451-2. Refer to Response to Comment No. 451-2, above.

Comment No. 541-3

Furthermore, I am worried about the environmental impact of this project. LA already deals with smog and excess carbon emissions, so I'm worried that this project will severely exacerbate this problem. Have the environmental impacts of the trucks been fully analyzed? What did your analysis conclude about increased greenhouse gas emissions?

Please cite specific studies. If studies have already been conducted, did they look at the impact of 50 trucks vs. 100 trucks? What about 200 trucks? Until we know how many trucks will be on-site, having all the possibilities included in the study is essential.

Response to Comment No. 541-3

This comment is identical to Comment No. 451-3. Refer to Response to Comment No. 451-3, above.

Comment No. 541-4

I am also worried about the traffic created by these trucks. In the conceptual plan, there doesn't seem to be a traffic-calming way for large trucks to make left hand turns onto the project site. Have proper analyses been done to evaluate what additional traffic these left turns would create? Has the city considered putting arrow signals on the traffic lights around the project site? Will a truck detour be created?

Response to Comment No. 541-4

This comment is identical to Comment No. 451-4. Refer to Response to Comment No. 451-4, above.

Comment No. 541-5

The concerns outlined above are shared by many Beverly Fairfax residents. I hope the city will take the time to answer my questions about the Television City project.

Response to Comment No. 541-5

This comment is identical to Comment No. 451-5. Nevertheless this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 451-2 through 451-4.

Comment Letter No. 542

Liat Tala
535 N. Fuller Ave.
Los Angeles, CA 90036-1940

Comment No. 542-1

This project is proposing to have thousands of trucks park near core community institutions like Fairfax High, Loyola High School as well as Kaiser Hospital, which serve children and patients makes this a dangerous situation, I am sure you are aware that Loyola High School is in a lower income area. Have you studied the potential health impacts on Loyola High's surrounding residents of the exhaust/ emissions from possibly 60,000 trucks? What is going to be done to ensure those residents will not be affected? I don't mean the city will keep risk to a minimum—I mean, what is the city going to do to make sure there is no health impact of this project on those residents? Because otherwise you are saying that a project developer's profit is more important than even one person not becoming sick from the project's impacts. Environmental and health justice cannot be bartered. Have health and environmental risk analyses need to be completed and shared with every resident 3 miles in every direction from these locations.

Response to Comment No. 542-1

Refer to Response to Comment Nos. 178-3, 183-1, and 231-4 regarding off-site staging. All haul truck staging locations will be provided on-site, so no haul trucks will be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

An analysis of environmental justice is not required under CEQA.

Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to SCAQMD comments on the Draft EIR, an HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the findings of the Draft EIR.

The Draft EIR's environmental analysis was conducted in compliance with CEQA based on the thresholds of Appendix G of the CEQA Guidelines. Thus, the 3-mile analysis requested in this comment is not required under CEQA.

Comment No. 542-2

I am also concerned about the route or routes that trucks will take when hauling off construction debris. Why is their route not specified in the draft EIR? We should know this before a project can be approved. I would like to know if I am going to be exposed to increased exhaust fumes, as this will have long-term impacts on my health. Will the increased traffic caused by the project mean these trucks will idle next to my home? What about the idling from being stuck in the already traffic-laden streets all around the project?

Response to Comment No. 542-2

Refer to Response to Comment Nos. 26-30 and 164-3 for a detailed discussion of the construction haul routes, staging areas, and idling and associated emissions and health risk.

Comment Letter No. 543

Jessica Tammariello
535 S. Curson Ave., Apt. 5B
Los Angeles, CA 90036-5261

Comment No. 543-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 543-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 544

Thomas Tanguay
350 S. Cloverdale Ave.
Los Angeles, CA 90036-3472

Comment No. 544-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

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Response to Comment No. 544-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 545

Debi Taub
357 N. Poinsettia Pl.
Los Angeles, CA 90036-2506

Comment No. 545-1

I am writing to present my questions and concerns regarding the TVC 2050 proposed project that will affect the historic CBS Television Studios.

I've provided a list of questions below.

Response to Comment No. 545-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 545-2 through 545-4.

Comment No. 545-2

- Please explain the process for analyzing how the multiple projects in the surrounding community will be affected. It's my understanding that projects within radius of 0.5 miles were included in your analysis. How was this radius determined? Have you fully analyzed what is within this 0.5 mile radius? How many businesses? How many crosswalks? How many stop signs and traffic lights? Understanding all of this information will be imperative.

Response to Comment No. 545-2

The Study Area analyzed in the Transportation Assessment (Appendix M.1 of the Draft EIR) was developed in concert with LADOT based on the number of trips and the anticipated directionality of Project trips. In the case of the Project, 31 key intersections were selected for operational analysis of Opening Day conditions within a study area that was bounded by an area 1.5 miles high by 1.25 miles wide. Figures 6–8 on pages 34–39 of the Transportation Assessment (Appendix M.1 of the Draft EIR) present the crosswalk, traffic control devices, and the traffic lane assignments at each of the 31 intersections as requested in the comment.

Per CEQA Guidelines Section 15355(b), related projects are "closely related past, present, and reasonably foreseeable probable future projects." The goal is to select those related projects that could send traffic through the Project's Study Area and influence the

key study intersections within that area. Figure 14 on page 47 and Table 5 on page 60 of the Transportation Assessment provide the location and description of 68 related projects that were included in the analysis. The related projects are in an area from Sunset Boulevard on the north to Olympic Boulevard on the south and the Santa Monica Boulevard/Wilshire Boulevard intersection of the west to La Brea Avenue on the east. The area stretches approximately 2.7 miles in the north-south direction by 2.8 miles in the east/west direction—far greater than the 0.5-mile study area mentioned in the comment.

In addition to the trips from 68 related projects, the background trip levels assume a one percent annual growth in ambient traffic levels. This turns out to be a very conservative estimate since the pandemic has virtually halted ambient traffic growth since 2019. In fact, the transportation analysis assumed that the background traffic would grow by 4 percent by 2023 and by 7 percent by 2026. The current traffic counts in 2023 have not yet returned to 2019 levels, and, therefore, the operational traffic analysis in the Transportation Assessment represents a conservative (i.e., high) estimate of background traffic levels.

The effects of all related project trips, the potential ambient growth in background traffic levels, and the Project trips were combined to evaluate the Project's operational effects on the 31 key intersections within the Study Area.

Comment No. 545-3

- The draft EIR states that “all related projects were assumed to be completed by the estimated 2026 Project buildout year for the purposes of traffic analysis.” Why are you assuming that all the related projects would be completed by 2026? What date does this assumes the construction begins? Is this assumption made for the purpose of understanding the impact on traffic and congestion? I’m concerned that you aren’t analyzing the full scope of construction on these projects, or the full scope of the proposed TVC 2050 project. You are failing to take into account the full process, construction, and impact of these projects.

Response to Comment No. 545-3

Traffic generated by all 68 related projects was assumed to be added to the future Opening Year background traffic levels even though some of these projects may never be built or may be delayed beyond the Year 2026 Opening Year date. It is, therefore, a conservative analysis because it is highly unlikely that all 68 related projects would be approved, constructed, and fully occupied by Year 2026.

Section 5D beginning of page 179 of the Transportation Assessment (Appendix M.1 of the Draft EIR) analyzes the worst-case construction impacts assuming that the entire Project was constructed in a 32-month period. Assuming Project construction starts in

2023, the 32-month construction period would result in a Project Opening Year of 2026. These assumptions allow for the analysis of the full impacts of the construction of the complete Project. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 545-4

- Finally, I'm concerned about the nature of this study. It appears that only qualitative analysis was conducted to understand the impact of transportation. Is qualitative analysis enough to understand the long-range buildout scenario? Will you perform any quantitative analysis? It seems unlikely that you can have a comprehensive study without considering both the qualitative and quantitative aspects of this proposed project.

Response to Comment No. 545-4

Section IV.K, Transportation, of the Draft EIR provides quantitative information where appropriate, particularly as related to the discussion of VMT impacts presented on pages IV.K-73 through IV.K-78 of the Draft EIR (i.e., quantification of building areas, daily vehicle trip rates, number of employee and employee trips, and daily work VMT, including daily VMT per employee). Additional detail, including more quantitative data, in support of the transportation analysis is provided in Appendix M.1, Transportation Assessment, of the Draft EIR. Chapter 4 of the Transportation Assessment summarizes the quantitative analysis the VMT analysis, summarized in Table 13 on page 123 while Chapter 5 beginning on page 134 and continuing until page 186 provides the quantitative analysis of the traffic operational analysis. Chapter 5 provides the level of service capacity analyses that readers are more used to seeing in a Draft EIR. The LOS operational analysis is summarized in Table 18 on page 162 of the Transportation Assessment where the "with and without Project" morning and afternoon peak hour LOS calculations for the 31 study intersections are presented.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths. That topical response includes additional details and another example regarding how work VMT per employee is calculated, and also provides empirical data in support of the employee trip length assumptions used in the VMT analysis.

Thus, the Transportation Assessment (Appendix M.1 of the Draft EIR) includes both the qualitative and quantitative analyses required of the EIR process, consistent with the TAG and CEQA.

Comment No. 545-5

I would urge you to fully think through the process of drafting the EIR and consider if you have done a sufficient amount of study to understand the impacts of traffic, congestion, and development on this community. I don't believe your scope of analysis is adequate to provide a comprehensive outlook on how this proposed project will negatively affect the livelihood of nearby residents.

Response to Comment No. 545-5

The Transportation Assessment meets all of the requirements of the State of California CEQA process and the requirements of the TAG. The Transportation Assessment (Appendix M.1 of the Draft EIR) has been thoroughly reviewed and approved by LADOT as summarized by their Assessment Letter dated November 16, 2021 (Appendix M.2 of the Draft EIR).

Both Chapter 4 and Chapter 5 of the Transportation Assessment (Appendix M.1 of the Draft EIR) present detailed quantitative analyses of VMT (Chapter 4) per CEQA and intersection LOS (Chapter 5) per the TAG. The analyses fully disclose the potential transportation impact of the Project and, according to State CEQA standards, the Project has no significant transportation impacts.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 546

Jack Taylor
541 1/2 N. Spaulding Ave.
Los Angeles, CA 90036-1807

Comment No. 546-1

The CVS studio expansion just does not work for our neighborhood.

Response to Comment No. 546-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 546-2

The construction will cause constant gridlock and create safety risks for all of us. Pedestrians and bicyclists will be seriously affected once sidewalks are closed, bike lanes host parked cars, and roads are closed.

Response to Comment No. 546-2

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

The Draft EIR discussed construction traffic in Section IV.K, Transportation, and the Transportation Assessment (Appendix M.1 of the Draft EIR) included a full analysis of construction traffic. As discussed therein, the Project includes the development of a CTMP prepared pursuant to Project Design Feature TR-PDF-1. The Project would not result in significant traffic safety hazards as construction staging, deliveries, etc. would occur within the boundaries of the Project Site. Any activity on the Project Site periphery would include pedestrian and bicycle protection and detours, as necessary. The Project would comply with all construction safety requirements and would not introduce unusual features that could result in a safety hazard. The haul routes use arterial streets and have been reviewed and approved by the City. By following standard rules and implementing the CTMP, the Project would not result in any significant safety hazards. Refer to pages IV.K-36 to IV.K-37, and IV.K-80 of the Draft EIR; pages 179 to 184 of the Transportation Assessment; and Topical Response No. 14, Construction Vehicle Impacts, for additional information.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

There are no plans for any long-term sidewalk or bike lane closures as part of the construction process. There are some utility upgrades that will require new or revised connections between the Project Site and utilities that currently run under the streets. For these connections, sidewalks and bike lanes would have to be closed temporarily, but the CTMP prepared pursuant to Project Design Feature TR-PDF-1 would require that temporary sidewalks and bicycle rerouting be provided to maintain pedestrian access past the Project Site.

Regarding concerns about cars parking in bike lanes, refer to Section A, Parking Supply, of Topical Response No. 13, Parking, for a discussion of how the parking provided on-site is more than adequate to meet peak parking demand. Refer to Section C, Parking Spillover into the Adjacent Neighborhoods and Properties, of the same topical response, for a discussion of how the adequate on-site parking supply will prevent the need to park off-site. Accordingly, no off-site parking is proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 546-3

There is the issue on how data was collected for this project. There are only qualitative discussions for the transportation impacts? Where is a quantitative assessment? Can you please explain the analysis here? What were the assumptions when looking at increase in traffic, where drivers to the site would be driving from and the distances, how often and how many days?

Response to Comment No. 546-3

Refer to Response to Comment Nos. 545-4 and 545-5 for a discussion of the quantitative analysis of the transportation impacts, including assumptions and data used, in Section IV.K, Transportation, of the Draft EIR, and in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Specifically responding to the detailed questions in the comment, the following sections of the Transportation Assessment (Appendix M.1 of the Draft EIR) address the requests:

Assumptions to produce estimates of trip increases:

- Future Background Trips: pages 26–29 and Figure 16 (page 51)

- Project Trips: Table 6 (page 81)
- Trip Distribution: Figures 19A and 19B (pages 69–70)
- Peak Hour Trip Levels: Figure 21 (page 77)

Contrary to the comment, the Transportation Assessment (Appendix M.1 of the Draft EIR) contains pages and pages of quantitative data and technical results summarizing vehicle miles traveled and intersection level of service for the Project. According to State CEQA standards, the Project would not create a significant transportation impact.

Comment No. 546-4

In several places, the EIR references things the applicant might do, such as maybe make some pedestrian improvements. How can the applicant have a plan approved when definitive improvements like that are uncertain, with no schedule and no explanation of when improvements will be decided upon? Why isn't the City requiring pedestrian improvements be put into place?

Response to Comment No. 546-4

Refer to Response to Comment Nos. 16-72, 28-18, 35-101, 172-3, and 313-2 regarding the Project's pedestrian-oriented design and public realm improvements.

Comment No. 546-5

When is the public going to hear anything about what "may" happen? How will we be sure if these improvements are even effective or work for the community?

Response to Comment No. 546-5

Refer to Response to Comment Nos. 16-72, 28-18, 35, 101, 172-3, and 313-2 regarding the Project's pedestrian-oriented design and public realm improvements.

Comment No. 546-6

There is also a lot of environmental uncertainty around the project's impacts. It seems impacts were studied for only a three year construction timeline, so how can the applicant be asking for a 20 year agreement and yet impacts for that long a period of time are not provided. What are the impacts for all planned and potential years of traffic? We cannot live with so much uncertainty about construction noise, traffic, and increased disruption every day.

Response to Comment No. 546-6

Refer to Response to Comment No. 9-24 regarding the Project timeline. As discussed therein, to be comprehensive and account for all potential impacts associated with the Project, an analysis of the impacts, including noise and traffic impacts, associated with a 20-year buildout is included for each of the environmental topics studied in the Draft EIR.

Comment No. 546-7

I just don't see how this project could be allowed to be built. So few people want this, but a lot of people are frustrated and do not want this project.

Please help me understand this and answer my questions.

Response to Comment No. 546-7

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 546-2 through 546-6 above, and 546-8 below.

Comment No. 546-8

There will be terrible traffic and other potential serious impacts to our community.

Response to Comment No. 546-8

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment Letter No. 547

Julia Teweles
413 N. Sierra Bonita Ave.
Los Angeles, CA 90036-2461

Comment No. 547-1

As a member of the Fairfax community, I feel threatened by the proposed project. How could such an egregious plan be put forward? There are many concerning aspects, and I will highlight a few of my main concerns below.

Response to Comment No. 547-1

This comment is identical to Comment No. 382-1; nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 547-2

As it stands, there is a large parking structure being placed on Grove Drive. Grove Drive is right across from Pan Pacific Park. Children, senior citizens, and everyone in between frequent this park. With this new parking structure, there are going to be many more trucks entering Grove Drive and emitting fumes and exhaust next to the park. How many trucks are expected to be in this parking structure? How much diesel exhaust is going to be emitted? What are the health risks to people? Are the health risks different for younger children than for senior citizens? Please provide a proper analysis on the health risks associated with all of this exhaust.

Response to Comment No. 547-2

This comment is identical to Comment No. 382-2. Refer to Response to Comment No. 382-2, above.

Comment No. 547-3

Staying on the theme of Grove Drive, essentially all of the parking is located on the road. This means that all the people trying to get to the project site will use Grove Drive. This seems impossible and is bound to be chaotic. How is the Grove gate going to handle this congestion? What will happen if 25% of traffic uses the Grove gate? What about 50%? 75%? And on the most extreme end, what would happen if 100% of the traffic tries to use the Grove gate?

Response to Comment No. 547-3

This comment is identical to Comment No. 382-3. Refer to Response to Comment No. 382-3, above.

Comment No. 547-4

Another thing that concerns me is parking plan. In its current state, it makes no sense. The Draft EIR outlines that there will be roughly 8,000 people employees on site. Additionally, the large audience stages could bring in 3,000 to 5,000 people a day to the site. However, the project is allotting 5,300 parking spaces. What is the plan for employee parking? How are parking permits going to be distributed? How are they going to be monitored and enforced? With these numbers, there are not enough spaces. Where is the overflow going to park? Are you going to have designated spaces for them nearby or are they expected to park all around our community?

Response to Comment No. 547-4

This comment is identical to Comment No. 382-4. Refer to Response to Comment No. 382-4, above.

Comment No. 547-5

All of the points above need to be addressed. They all directly impact the health and lifestyle of residents like me, and it is important for these questions to be answered and changes to be made. The plan as it stands is unacceptable and needs to be heavily reconsidered.

Response to Comment No. 547-5

This comment is identical to Comment No. 382-5; nevertheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 548

Elsa Thompson
534 N. Kilkea Dr.
Los Angeles, CA 90048-2212

Comment No. 548-1

As a resident of 49 years, I really do not understand this project.

Response to Comment No. 548-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 548-2 through 548-10.

Comment No. 548-2

Please explain how the Television City expansion project will be laid out. The Draft EIR lacks a lot of detail about the buildings, sound stages, parking, and other aspects of the proposal.

Response to Comment No. 548-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan. As discussed in these responses, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Comment No. 548-3

I have some concerns I am requested [sic] that you address:

- I understand that many billboards will be placed throughout and surrounding the site. What size billboards and how many? Where will billboards be located? Please show where these will be located and how they will be lit?

Response to Comment No. 548-3

This comment is identical to the first half of Comment No. 277-2. Refer to Response to Comment No. 277-2 regarding billboards, which would be prohibited by the proposed Sign District.

Comment No. 548-4

Nighttime signage could impact animals.

Response to Comment No. 548-4

This comment is identical to a portion of Comment No. 277-2. Refer to Response to Comment No. 277-2, above.

Comment No. 548-5

The lighting and energy used for signs was not included in the report. Where is the analysis of those?

Response to Comment No. 548-5

This comment is identical to a portion of Comment No. 277-2. Refer to Response to Comment No. 277-2, above.

Comment No. 548-6

- Outdoor gatherings are expected events and I would like more information about where Television City would allow these. Nighttime parties across from residences would be noisy and disruptive. How does the developer plan to approach this common occurrence and protect the people who live near the project? How often would they be held? What kinds of outdoor gatherings? Will there be a limit of what types of events would be allowed?

Response to Comment No. 548-6

This comment is identical to Comment No. 277-3. Refer to Response to Comment No. 277-3, above.

Comment No. 548-7

- The Mobility Hub mentioned is not something most people are familiar with. What is a Mobility Hub? It sounds as though it is more than a bus stop? Who is expected will use it? It sounds like it could be a very busy place, and there are

many safety concerns for this ambiguous facility. Who decided a hub of this kind was needed in our neighborhood? Will buses, taxis and ride shares be a part of it? No one came to speak with me about it.

Response to Comment No. 548-7

This comment is identical to Comment No. 277-4. Refer to Response to Comment No. 277-4, above.

Comment No. 548-8

- The streets that surround the property can't hold more people and more traffic, especially on Grove Dr., Beverly Blvd and Fairfax, and West 3rd. Was the fact that these main streets are already so busy considered? Wasn't the fact that the corner where Erewhon and the post office are located is a crazy busy intersection considered? Cars trying to turn in either direction onto Beverly from Grove typically can't do that in one light. And drivers have a terrible time trying to get out of the post office parking lot, into traffic in both directions. What is going to be done about the gridlock there already? There will be potentially thousands of workers, visitors, audiences to the studios, and others driving trying to get through traffic to get to the site and then to the parking garage.

Response to Comment No. 548-8

This comment is identical to Comment No. 277-5. Refer to Response to Comment No. 277-5, above.

Comment No. 548-9

- Will the buildings for this expansion be 15 or 20 stories high, which? How was that height decided? Where will those tall buildings be located?

Response to Comment No. 548-9

This comment is identical to Comment No. 277-6. Refer to Response to Comment No. 277-6, above.

Comment No. 548-10

With this imprecise information, it seems the developer is keeping so many options open for the project. This is not helpful for people in the community who want to understand what is proposed to be built in the neighborhood. The EIR needs to be cleaned up and more specific. It is unfair for Angelenos to be kept in the dark

Response to Comment No. 548-10

This comment is identical to Comment No. 277-7. Refer to Response to Comment No. 277-7, above.

Comment Letter No. 549

John Thompson
7905 Melrose Ave.
Los Angeles, CA 90046-7109

Comment No. 549-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 549-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 550

Kevin Thulin
146 N. Fuller Ave.
Los Angeles, CA 90036-2812

Comment No. 550-1

Please answer the following questions related to the Television City expansion project EIR. It is unsatisfactory in its explanations of vehicle miles traveled, benefits, and water usage.

Response to Comment No. 550-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 550-2 through 550-5.

Comment No. 550-2

1. The people who will work in the upgraded facility are listed as driving an average of 6.7 round trip miles to get there and home. These vehicle miles traveled analysis cannot be accurate. The number of commuters coming from locations such as the San Fernando Valley and Orange County and other parts of LA is large, most likely a majority. The distances do not work with the numbers. Where did the information come from to determine the 6.7-mile figure? Vehicle Miles Traveled is a pressing issue in LA, and the information should be accurate to protect our environment and people's safety.

Response to Comment No. 550-2

Refer to Section C, Assumptions in the VMT Analysis, Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 550-3

2. When the EIR looks as though it is only for the benefit of the developer itself, it is a problem. I see alternatives in the EIR that look like they intentionally favor the proposal of the developer. Why aren't the other alternatives being given greater consideration? They are described as alternatives that were already considered and dismissed, but never put out for public input before being dismissed.

Response to Comment No. 550-3

Refer to Topical Response No. 16, Project Alternatives Analysis, regarding the range of alternatives selected. As stated therein, there are no requirements governing the nature or scope of the “reasonable range” of alternatives to be discussed, other than the “rule of reason” (CEQA Guidelines Section 15126.6(a) and (f)). The range of alternatives chosen was appropriately based on the significant impacts identified in the Draft EIR and public comments.

With respect to public input, refer to Response to Comment Nos. 28-13 and 32-3 regarding the extensive public outreach that has been conducted and the noticing of the Project in compliance with CEQA. This Final EIR includes responses to all comments received during the Draft EIR review period of 60 days, which exceeds the required 45-day period per CEQA. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings before City decision-makers prior to any approval. The public will have additional opportunities to comment on the Project at upcoming hearings, the dates of which will be published in accordance with the City’s noticing requirements.

Comment No. 550-4

3. Additionally, the developer’s earning potential is a goal of the project. Of course, the developer wants to make money from this huge project, but this information is totally irrelevant to the EIR. Why is the EIR at all about the fiscal benefits of the project? Isn’t the EIR’s purpose to protect the citizens of LA along with its land and flora and fauna?

Response to Comment No. 550-4

Refer to Topical Response No. 4, Appropriateness of Economic Objective, with regard to the appropriateness of the economic objective for the Project included in the Draft EIR. This comment raises non-CEQA issues. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As described in Section 15121 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of the Draft EIR is to focus the discussion on the Project’s potential environmental effects that the City, as the Lead Agency, has determined to be, or potentially may be significant. The Draft EIR was prepared in accordance with CEQA and City requirements, and includes analyses related to human health, wildlife, and protected plant species as appropriate. Refer specifically to

Draft EIR Sections IV.A, Air Quality, and IV.F, Hazards and Hazardous Materials, as well as the Initial Study included as Appendix A of the Draft EIR.

Comment No. 550-5

4. I am also concerned about the expansion because of the impact on the water usage. Any construction project is going to use a lot of this precious resource in our water-starved state. After construction, too, the expanded Television City would use a lot of water. Please describe what the water uses will be when the building is in regular use. What will the various uses of water be? This project is so large, the EIR says it will increase water use by six times. Six seems like an extreme increase. However, it is not identified as a significant impact in the EIR. Why is this? Where is the cutoff for a significant impact for water use? I am discouraged by this cavalier attitude toward the use of something we need to value in LA and throughout California.

Response to Comment No. 550-5

Refer to Response to Comment Nos. 16-66 and 26-175 with regard to the adequacy of water supply, Response to Comment No. 223-2 with regard to the types of water demand associated with the Project, and Response to Comment No. 292-2 with regard to the threshold for a significant impact related to water demand under CEQA.

Comment No. 550-6

This project is unacceptable based on what the EIR says currently.

Response to Comment No. 550-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 550-2 through 550-5.

Comment Letter No. 551

Vall Tirsoaga
1830 W. 36th St.
Los Angeles, CA 90018-3813

Comment No. 551-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 551-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 552

Josh and Rachel Tomaszewski
162 S. Alta Vista Blvd.
Los Angeles, CA 90036-2824

Comment No. 552-1

I am very concerned about the development plan for the Television City location.

Response to Comment No. 552-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 552-2 through 552-4.

Comment No. 552-2

The plan talks about many dozens of large 18 wheeler trucks driving to and being on the site. Is there any analysis of the environmental impacts that so many 18 wheelers will have on the community? I worry that no consideration has been given to how these trucks will affect air quality and am very curious if this has been considered at all. If it has been examined, what did the city find out? Those findings should be shared with the public. How often will this particular kind of truck traffic be driving to the property, and from where? Will they park on the property? For how long?

Response to Comment No. 552-2

This comment is identical to Comment No. 157-2. Refer to Response to Comment No. 157-2, above.

Comment No. 552-3

What about when they are exiting the property? They will have to turn into the huge amount of traffic on the streets that lie all around the perimeter of the property, so how will that be done?

There are no dedicated lanes to get cars and trucks on the street. If there were dedicated turn lanes where vehicles could turn onto the project the traffic and congestion would still be very bad—but without dedicated turn lanes, it's going to be a huge mess. This community will not be able to accommodate this type of additional consequences for the traffic situation in that vicinity. What is going to be done about this?

Response to Comment No. 552-3

This comment is identical to Comment No. 157-3. Refer to Response to Comment No. 157-3, above.

Comment No. 552-4

Additionally, having all the parking on Grove Drive makes no sense. Grove Drive is not able to accommodate that many cars. I feel like this process is rushed and the EIR has been rushed and all these details have not been fully thought through. What alternatives routes or streets were considered?

What is the overall parking plan for the development? Aren't they required to have something like a parking management plan? Does it include the implications for the neighborhood?

Response to Comment No. 552-4

This comment is identical to Comment No. 157-4. Refer to Response to Comment No. 157-4, above.

Comment No. 552-5

Unless these measures are addressed I strongly oppose this project

Response to Comment No. 552-5

This comment is identical to Comment No. 157-5. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 552-2 through 552-4.

Comment Letter No. 553

Elena Topoozian
631 N. Las Palmas Ave.
Los Angeles, CA 90004-1019

Comment No. 553-1

I am writing to you as a concerned constituent of CD5 who has lived in the Fairfax, Melrose, and Hancock Park neighborhoods for nearly 40 years. I am deeply concerned regarding the proposed overdevelopment of the CBS Studios, known as the TVC 2050 Project.

Response to Comment No. 553-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 553-2 and 553-3.

Comment No. 553-2

As it stands now, the current proposal of a 20 story building with the added office space would not be in keeping with the historic nature of the beloved Original Farmers Market.

Response to Comment No. 553-2

This comment is the opinion of the commenter and does not relate to the Draft EIR's analysis of historic impacts. Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding the Draft EIR's analysis of impacts to The Original Farmers Market. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 553-3

Besides the traffic, congestion, and construction disruptions that would go on for years (literally years), the idea of a 20 story building, towering over the rest of the neighborhood, is preposterous. A building like that is appropriate for DTLA or Century City, but not in the heart of the Fairfax district.

Response to Comment No. 553-3

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment No. 96-5 regarding construction impacts and the proposed CTMP.

Refer to Response to Comment Nos. 9-16, 11-3, and 26-7 regarding the height of the Project. Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation.

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 553-4

I implore you to work closely with the developers and the city planners to come to a more reasonable development project that fits both the needs of CBS Studios and the community.

Thank you very much, [sic]

Response to Comment No. 553-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 553-2 and 553-3.

Comment Letter No. 554

Marco Torres
6322 W. Slauson Ave.
Culver City, CA 90230-6126

Comment No. 554-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of entertainment and production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 554-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 555

Sarah Torres
603 S. Citrus Ave.
Los Angeles, CA 90036-3534

Comment No. 555-1

Before you make decisions about allowing the Television City expansion project, I want to make my concerns known. I am a resident whose voice should be heard.

Response to Comment No. 555-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 555-2

The Television City expansion Draft EIR is confusing and unclear. When is the city going to hold public hearings so that the community can really understand what the project will do? Why is there no specific plan required, a plan that provides details rather than general descriptions? How are we supposed to understand impacts of a development that lacks specifics about what is going to be built and the effects? What does getting a Specific Plan mean and why can it lack specifics? Seems contradictory. Please explain exactly how the current codes or zoning for this building and for the property would be changed from what is in place now for this proposed project?

Response to Comment No. 555-2

This comment is identical to Comment No. 57-2. Refer to Response to Comment No. 57-2, above.

Comment No. 555-3

Another concern about this project is that it will lead to more development. If Television City's expansion happens, then the general plan for the community will change, won't it? Will this change open the door to more development? What kinds of development would then be allowed? How does the EIR address how this development will lead to even more? Does that mean that future projects wouldn't have to be approved? It is not acceptable that the Television City project would be an umbrella project for other projects and development, but is that what would happen?

Response to Comment No. 555-3

This comment is identical to Comment No. 57-3. Refer to Response to Comment No. 57-3, above.

Comment No. 555-4

Parking for the tremendous increase of workers at a new, larger facility will be a problem. The EIR says there are more than 5,000 spaces to be added at the site with more located offsite. That number of parking spaces doesn't even match the expected number of new employees, so what about those that can't park on site? What does offsite mean? And where is offsite? Will more parking spaces be created in other parts of the neighborhood? If so, how will that impact the area surrounding the project?

Response to Comment No. 555-4

This comment is identical to Comment No. 57-4. Refer to Response to Comment No. 57-4, above.

Comment No. 555-5

I believe Television City should not increase in size because of the potential for even more development and quality of life impacts for the community.

Response to Comment No. 555-5

This comment is identical to Comment No. 57-5. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Please note that quality of life is not a CEQA impact.

Comment Letter No. 556

Amy Townsend
118 N. Kilkea Dr.
Los Angeles, CA 0048-3524

Comment No. 556-1

I am most concerned about traffic and the lack of benefits it will bring to our neighborhood. We simply don't need any more traffic. How will this impact traffic during rush hour? I already sit in traffic for hours every day.

Response to Comment No. 556-1

This comment is identical to Comment No. 465-4. Refer to Response to Comment No. 465-4, above.

Comment No. 556-2

How long will construction take? The DEIR says that the project could be built in one phase over 32 months, but it could extend until 2043? That's over 20 years of construction in our neighborhood.

Response to Comment No. 556-2

This comment is identical to Comment No. 465-5. Refer to Response to Comment No. 465-5, above.

Comment No. 556-3

I don't want to live in a neighborhood that will be consumed by traffic Monday through Friday from 7AM until 9PM and all day on Saturday for the next 20 years. That is unacceptable. This is not even limited to off peak hours. This would include during rush hour every single day. Not to mention all the noise from construction. If the project takes the full 20 years, doesn't that mean we are subject to construction noise for the next two decades?

Response to Comment No. 556-3

This comment is identical to Comment No. 465-6. Refer to Response to Comment No. 465-6, above.

Comment Letter No. 557

Ann Trank
465 N. Gardner St.
Los Angeles, CA 90036-5708

Comment No. 557-1

I have lived in this neighborhood for over 40 years. I am a local biker and walker who is deeply concerned about the potential hazards and risks that will be brought to our neighborhood by the proposed studio expansion. This whole project appears to me as one big safety threat.

Response to Comment No. 557-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 557-2 and 557-3.

Comment No. 557-2

I have multiple questions in regards to pedestrian traffic and “improvements.” First of all, how many sidewalks will be added? That was not made clear in the proposal. And how many cars will wind up on the road as a result of this new construct? I feel joggers and bikers like me have a right to know what the increased risks will be from getting hit by a car or truck passing through our area on the way the to the studio site.

Response to Comment No. 557-2

Sidewalks surround the Project Site on the west, east, and north sides. These sidewalks will be maintained and improved with wider sidewalks and/or upgraded landscape parkways. Refer to Response to Comment No. 16-72 for a discussion of the proposed improvements to enhance the public realm. Controlled pedestrian crosswalks would be added at the two new traffic signals (one on Fairfax Avenue and one on The Grove Drive).

The Transportation Assessment included as Appendix M.1 of the Draft EIR shows on Table 13 on page 123 that the Project would add approximately 9,733 net new vehicle trips per day to the roadways within the Study Area. These trips would be spread out among Fairfax Avenue to the north and south and Beverly Boulevard and 3rd Street to the east and west. Refer to Topical Response No. 10, Trip Generation.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

Comment No. 557-3

Speaking of bikes, I saw the plan referenced bicycle lane “improvements” as well, but again it was not clear what those would be. Nor is there an actual clear timeline. With all these additional vehicles passing through our neighborhood, it appears there is not plan to ensure the safety of pedestrians or bikers. What about bike lanes—will there be more? Will existing ones be changed? How do you plan to ensure safety with no additional bike lanes? Do you plan to widen the existing lanes? How are we expected to walk and ride safely?

Response to Comment No. 557-3

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 16-72 and 26-E.4-3 regarding pedestrian safety and the Project’s pedestrian-oriented design.

As part of the Project’s Transportation Improvement Program (see Topical Response No. 15), the Project is committed to a financial contribution to advance the Rosewood Avenue neighborhood bicycle greenway. The Rosewood Avenue bicycle greenway is under study between La Cienega Boulevard on the west and La Brea Avenue on the east. Improvements such as curb extensions and neighborhood traffic circles would reduce vehicular speeds and enhance the experience for bicyclists. With respect to neighborhood intrusion, refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 557-4

Please address these concerns. They are very reasonable and important questions that should be answered.

Response to Comment No. 557-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 557-2 and 557-3.

Comment Letter No. 558

Karen Tsai
6206 W. Fifth St.
Los Angeles, CA 90048-4726

Comment No. 558-1

This community has been my home for the past 12 years and I'm very concerned about what is being proposed—

Response to Comment No. 558-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 558-2 through 558-3.

Comment No. 558-2

from what I've seen, the project is likely to attract thousands of audience people a day and tons of huge trucks will be driving in and out for years to come.

People will be speeding through and parking in our community—lots of schools are located here. Jewish people walk to services. Children and older people and families go to the park and Farmer's Market.

Response to Comment No. 558-2

The claim that the Project would result in thousands of audience members per day is inaccurate. The Project Site today attracts an average of approximately 213 audience members on a weekday. This number is expected to increase to an average of approximately 384 audience members on a weekday (i.e., a net increase of less than 200 audience members) upon full buildout of the Project. Audience trips represent a small percentage of the total vehicle trips in and out of the Project Site daily.

Refer to Topical Response No. 10, Trip Generation, regarding the truck and automobile trip generation estimates during Project operation.

Refer to Topical Response No. 12, Safety and Congestion, and Response to Comment No. 26-E.4-3 regarding pedestrian safety.

With respect to neighborhood intrusion, refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR). The intent of the NTMP explained in Topical Response No. 9 is to address the issues of cut-through trips, speeding, and pedestrian safety within the neighborhoods.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 558-3

Has the Draft Environmental Impact Report studied the security risks for our community? What about the air quality impacts?

Response to Comment No. 558-3

Section IV.J.2, Public Services—Police Protection, of the Draft EIR includes a detailed analysis of potential impacts related to police protection during both construction and operation. Impacts were determined to be less than significant. Refer also to Response to Comment No. 16-5 regarding the adequacy of LAPD police protection services to serve the Project Site and an overview of the security plan and associated security measures that would be implemented by the Project to ensure safety and security.

Section IV.A, Air Quality, of the Draft EIR contains a detailed analysis of the Project's potential impact on air quality during both construction and operation.

Comment Letter No. 559

Mark Tuohy
101 S. Kilkea Dr.
Los Angeles, CA 90048-3525

Comment No. 559-1

As a neighborhood resident of 17 years, I am really concerned about this project.

Response to Comment No. 559-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 559-2 through 559-3.

Comment No. 559-2

Traffic and parking are top of mind—with almost all the parking located on Grove Drive, most if not virtually all, of the people trying to get to the site will use Grove Drive. It will be a disaster. Please show what will happen if 50% or 75% of the traffic tries to use the Grove gate.

Response to Comment No. 559-2

Refer to Response to Comment Nos. 26-171 and 26-E.4-17 for a discussion of parking access and use of The Grove Drive.

Comment No. 559-3

The project proposes 14 stages, many of which will be audience stages. This could add thousands of people to the site, not to mention constant trucking. What happens when they park in the community? What are the risks from a security standpoint for the community? Speeding in the community could raise a big problem for children and older people. And for Jewish people walking to services.

Please analyze the Vehicle Miles Travelled implications of these additional trips, the impact on neighborhood safety, and the impact on air quality.

Response to Comment No. 559-3

Refer to Response to Comment Nos. 227-3 and 436-3 and Topical Response No. 10, Trip Generation, regarding audience and truck trips.

Refer to Response to Comment No. 405-4 regarding speeding.

The Project would generate truck trips on a daily basis. It is anticipated that the Project would generate a total of approximately 83 trucks per day.

Refer to Topical Response No. 13, Parking, for a discussion of derivation of the proposed parking supply and the adequacy of that supply to meet the peak Project demands. Because the Project's parking supply is projected to be adequate to meet the parking demands, spillover parking into the neighborhoods is not anticipated.

The audience trips are already accounted for in the air quality analyses presented in Section IV.A, Air Quality, of the Draft EIR. As discussed therein, operational air quality impacts, including those associated with vehicle trips, would be less than significant.

With respect to security, the Project includes Project Design Feature POL-PDF-1, which requires the implementation of security features, including security fencing, low-level security lighting, locked entry, and security patrols.

Comment Letter No. 560

Mary Ann Turkmany
maturkmany@icloud.com

Comment No. 560-1

Thank you for joining the Beverly Fairfax Community Alliance!

Our coalition's objective is to stop the Television City 2050 Project (TVC 2050) as proposed and work with the developer on something that is sensible, reflects the voices of the neighbors, and represents a better fit for our community.

About the TVC 2050 Project:

This project will add almost 2,000,000 square feet of development with 1.4 million square feet of offices. This represents an enormous increase from the current site.

A construction timeline of 20 years could bottleneck our communities with construction trucks delivering millions of tons of steel, concrete, and dirt.

The magnitude of this expansion will bring traffic, gridlock, disruption to mobility, and more cars into neighborhood streets than we have ever experienced before.

Help us preserve our community by submitting a letter with your concerns to Councilmember Koretz (paul.koretz@lacity.org) and Staff Planner Paul Caporaso (paul.caporaso@lacity.org)

Let them know that a “Regional Center” designation is inappropriate and request they take more time to review the Draft EIR so the community can understand this massive project.

–The Beverly Fairfax Community Alliance

Response to Comment No. 560-1

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation and its relation to the size of the Project.

Refer to Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

The comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 561

Arnold Turner
aturnerarchives1@gmail.com

Comment No. 561-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 561-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 562

Sher Unger
358 N. Gardner St.
Los Angeles, CA 90036-5721

Comment No. 562-1

I am writing to express grave concern that your upcoming development will negatively impact the community. As an active and proud citizen of the city, I implore you to consider the adverse effects this will have on neighboring communities and citizens.

Response to Comment No. 562-1

This comment is identical to Comment No. 523-1 but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 562-2 through 562-5.

Comment No. 562-2

Transportation and Travel: I don't understand the Vehicle Miles Travelled analysis. It says it is based on a City model, but it doesn't seem to make any sense. There are assumptions about people using transportation, but where are these assumptions from? How many people take public transportation to the site today or did before the pandemic? This would be the best data. We all know that people who work in office projects don't take public transportation. Where do the people live who will work here? The EIR seems to assume they live close by, but where's the evidence supporting this? Why is Vehicles Miles Travelled limited to employees only? What about the distance that trucks and deliveries will travel? What about all the live audience shows? How far are the audience members going to travel?

Response to Comment No. 562-2

This comment is identical to Comment No. 523-2. Refer to Response to Comment No. 523-2, above.

Comment No. 562-3

Planning Structure: It is imperative the community is aware of the plans for this development. We should not be left in the dark and unsure about the project's time frame. What are the phases of how this project will be built? What does the specific plan

referenced have to do with the applicant's plan as analyzed in the EIR? Where are the specifics of a specific plan?

Response to Comment No. 562-3

This comment is identical to Comment Nos. 523-3 and 523-4. Refer to Response to Comment Nos. 523-3 and 523-4, above.

Comment No. 562-4

Please show a phasing plan for this project so the community can know what will be built when. What is a development agreement and why would the city give a 20-year one?

Response to Comment No. 562-4

This comment is identical to Comment Nos. 523-5 and 523-6. Refer to Response to Comment Nos. 523-5 and 523-6, above.

Comment No. 562-5

Environmental Safety: As a conscious group of citizens, we always seek out ways to preserve our environment. The conceptual plan shows many dozens of big 18-wheeler trucks on the site. How many trucks can be on site? Have the impacts of the trucks been fully analyzed. Does the Air Quality analysis show that there could be 50, 100 or 200 production trucks spewing diesel particulates in the community for years to come? What about the greenhouse gas emissions?

Response to Comment No. 562-5

This comment is identical to Comment No. 523-7. Refer to Response to Comment No. 523-7, above.

Comment No. 562-6

These question are important to citizens of the city and we are eager to see how these concerns will be addressed.

Response to Comment No. 562-6

This comment is identical to Comment No. 523-8. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific

issues raised by the commenter are addressed in Response to Comment Nos. 562-2 through 562-5.

Comment Letter No. 563

Alfred Union
336 N. Detroit St.
Los Angeles, CA 90036-2531

Comment No. 563-1

I am writing to express my concern and opposition toward the TVC 2050 project and its impacts on the community.

Response to Comment No. 563-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 563-2 through 563-3.

Comment No. 563-2

I am very confused because I have looked through the Draft EIR and I still don't know what uses the developer actually intends for the project site!

Response to Comment No. 563-2

This comment is identical to a portion of Comment No. 440-1. Refer to Response to Comment No. 440-1, above.

Comment No. 563-3

Warehousing and "conference facilities?" What does the developer intend to do with those uses, exactly? And what impacts will those uses have on the community and the environment? Because I tried to find those impacts in the document and they seem totally missing. How can the impacts of different "uses" that are not spelled out in the first place even be analyzed? The project developer wants to have flexibility, but if the uses change, will those uses then be studied?

In fact, the Draft EIR seems to say that ANY use in the C2 zone will be permitted on this lot. That's a lot of uses. If the developer intends to tell us that their project could include any of those uses, then the developer should also be obligated to tell us the impact of the entire range of uses allowed on the property. Where is that analysis—of all the impacts of all the uses that could potentially be allowed? If they are allowed to do anything that is permitted in a C2 zone, will the city require them to study the impact of each of those uses?

If not, why? It seems like they are trying to sneak in additional uses that the neighborhood may object to.

If the project is allowed to build a fueling station and vehicle repair facility, then we should know what the air quality, safety, and traffic impacts would be on surrounding residents. So, what uses will the developer actually be permitted to have on the site?

How can the public understand and weigh in when it hasn't been made clear what the actual planned uses are? When will a definitive plan be made available? How can the City approve a project that is more in concept than in specifics? If that is even possible, what do you then tell community members about how the project is going to actually affect their daily and long-term lives?

Will the city have any power to impose restrictions on how they use this property in a way that is more restrictive than the C2 zoning? What powers do they have and what will the enforcement method be? What penalties can be imposed on the developer if they violate those restrictions?

The developer should be required to add more clarity to the draft EIR about the intended uses on their property. Neighbors deserve to know what will actually happen on the property.

Response to Comment No. 563-3

The first three paragraphs of this comment are identical to Comment 440-2. Refer to Response to Comment 440-2, above.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Refer to Topical Response No. 3, Permitted On-Site Uses, and Response to Comment No. 5-6 regarding the five permitted studio uses. As discussed therein, based on input received in response to the Draft EIR, the permitted uses were clarified to reflect the studio objective of the Project and the reference to all C2 uses has been removed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. The proposed Specific Plan would only allow five land uses—sound stage, production support, production office, general office, and retail—as well as related ancillary and supportive uses, all of which were fully disclosed and analyzed in the EIR. Further, as discussed in Topical

Response No. 1, the Draft EIR analyzed the proposed development program as well as the maximum impact scenarios to account for the full range of impacts associated with the Project.

Refer to Response to Comment Nos. 26-10 and 26-14 regarding warehouse and conference facility uses. A fueling station or vehicle repair facility would not be permitted, as stated incorrectly by the commenter.

The fourth paragraph of this comment is identical to Comment No. 376-2. Refer to Response to Comment No. 376-2, above.

The fifth paragraph of this comment is identical to Comment No. 376-3. Refer to Response to Comment No. 376-3, above.

The last paragraph of this comment is identical to Comment No. 376-4. Refer to Response to Comment No. 376-4, above

Comment Letter No. 564

Debra Union
336 N. Detroit St.
Los Angeles, CA 90036-2531

Comment No. 564-1

As a resident of the Mid City West area, for over 30 years I am very concerned about the proposed increase in the size of the Television City studio.

Response to Comment No. 564-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 564-2 through 564-4.

Comment No. 564-2

What does the construction period mean for my neighborhood? What notifications will be sent out as to the disruptions, what they will be and when they will be scheduled? How far in advance will the area be told? Does it depend on what kind of disruption it is, such as a lane closure, or a sidewalk being torn up, or parking spaces being blocked?

Response to Comment No. 564-2

This comment is identical to portions of the first paragraph of Comment No. 129-2. Refer to Response to Comment No. 129-2 regarding Project construction.

Comment No. 564-3

What does the increase in studio space and employees mean for traffic? What days of the week will be affected, and by how much traffic? What kind of traffic—cars, trucks, both? What will the expected traffic patterns be during construction? What about once the development is done?

Response to Comment No. 564-3

This comment is identical to the second paragraph of Comment No. 129-2. Refer to Response to Comment No. 129-2, above.

Comment No. 564-4

The EIR doesn't tell me where the construction trucks are going to travel. Can trucks use any route? Will neighbors be consulted? Will churches and synagogues be consulted? Will schools be consulted? Two sisters walking home from school were killed recently in South Los Angeles by a dump truck.

Response to Comment No. 564-4

This comment is identical to the third paragraph of Comment No. 129-2. Refer to Response to Comment No. 129-2, above.

Comment No. 564-5

I would appreciate responses to all of my questions and concerns.

Response to Comment No. 564-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 564-2 through 564-4.

Comment Letter No. 565

Pauline Van Keulen
548 N. Spaulding Ave.
Los Angeles, CA 90036-1808

Comment No. 565-1

Has anyone carefully considered the impact of traffic congestion? The Draft EIR states there will be almost 8,000 employees on the site. Plus 3,000–5,000 people per day could be coming to the site—most will probably drive, but others will come via Uber and Lyft. Plus, hundreds of trucks coming in and out of site, for twenty years. That all adds up to filthy air and incredible traffic, even if there are dedicated traffic cops assigned to the area.

Response to Comment No. 565-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips.

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Air quality analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, of the Draft EIR. Project construction would result in a significant Project-level and cumulative impact related to regional NO_x emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable. However, construction and operation of the Project would not result in localized air quality impacts. The Project also includes a quantitative HRA included as Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Refer to Response to Comment No. 26-E.1-2 for further discussion of the HRA. Operational air quality impacts would be less than significant.

Comment No. 565-2

And where are all of these people going to park? The current plan of 5,300 parking spaces is laughably insufficient.

Response to Comment No. 565-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking.

Comment Letter No. 566

Henry van Mayland
546 S. Curson Ave.
Los Angeles, CA 90036-3253

Comment No. 566-1

I want to express my support for the Television City Project.

First, it is of vital importance to Los Angeles that it maintain its position as the leading production city in the world, and this project will go some way to alleviating the current shortage of sound stages and other production facilities. Providing a place of employment for nearly 8,000 people is also a boost to the economic wellbeing of the region.

Second, it integrates neatly into Los Angeles' future public transport plans—the Purple Line Wilshire/Fairfax station to the south and the possibility of the Crenshaw Line Northern Extension Beverly/Fairfax station, which promises to be immediately adjacent to this project, this on top of local bus lines. The Project's Mobility Hub will further facilitate public transport usage. I am particularly appreciative that the VMT impact would not be significant. In a densifying residential area, it is also a reasonable assumption that many employees will walk.

Third, I am delighted that the original CBS buildings will be not only restored, but kept for their original use.

Finally, and I write now as a resident of Park La Brea who regularly walks in the area, a bleak and sun-blasted stretch of Fairfax which has been a discontinuity in our neighborhood for decades is being resolved.

Response to Comment No. 566-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 567

Sam Van Wagemen
8139 Blackburn Ave.
Los Angeles, CA 90048-4423

Comment No. 567-1

I recently learned about some concerning details regarding the Television City renovations. My major concerns are the length of this project and the lack of transparency regarding its approval.

Response to Comment No. 567-1

This introductory comment is identical to Comment No. 282-1; nonetheless, it is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 567-2.

Comment No. 567-2

I had not received any notifications regarding the approval process for this project, and yet now I hear that it's being fast-tracked for approval. I think this is a gross breach of public trust, and any approvals should be delayed until the public has appropriate time to hear about the potential impacts of this project. After all, I understand the developer is asking for a 20-year timeframe for the project.

Why would the city approve a project that could cause impacts to the area for 20 years? Are the impacts going to be worse over that timeframe? How is the community supposed to understand exactly what the impacts are going to be for each of those and cumulatively over that period?

Response to Comment No. 567-2

This comment is identical to the first two paragraphs of Comment No. 282-2. Refer to Response to Comment No. 282-2, above.

Comment No. 567-3

That is an incredible amount of time to be building something without proper oversight from the community. I have not heard about any community benefits offered to ensure the community will benefit, or at least not be harmed, by this development. I'd urge you to pause this plan until the community has an appropriate amount of time to actually

understand how the neighborhood will change with this huge development. After all, you're here to represent us and not Hollywood elites, right?

Response to Comment No. 567-3

This comment is identical to the last paragraph in Comment No. 282-2. Nevertheless the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment No. 282-2.

Comment Letter No. 568

Amelia Vargas
358 N. Ogden Dr.
Los Angeles, CA 90036-2163

Comment No. 568-1

I'm writing to comment on the draft EIR for the proposed project at the Television studios.

Response to Comment No. 568-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 568-2

What are they building? I've heard there will be new studios, new stages and a lot of offices. But then I heard about some kind of mobility hub, which sounds like a bus or transit station. So which is it—are they going to have studios and stages, or will it be an office building, or is it going to some kind of transit center? And I heard there will be outdoor events too? So it is going to be concert venue? What else are they planning to do with the property?

What is going to be the effect in the surrounding neighborhoods of all those different things going onto the site? All this information needs to be made clear to residents and businesses. They are ones that will be affected by this project.

There are too many unknowns for those of us in the community to really understand and weigh in on this plan.

Will they be allowed to build anything taller than what is there now? What are the height requirements? Is there a limit to how big any of the buildings can be?

Response to Comment No. 568-2

This comment is identical to Comment No. 131-2. Refer to Response to Comment No. 131-2, above.

Comment No. 568-3

They need to narrow down what it is they are doing and then send the plan to go through the process again. When will that process happen? If the plan is updated with more detailed information, will you recirculate to the community?

This is a massive project, and more information is needed.

Thank you for your time and consideration.

Response to Comment No. 568-3

This comment is identical to Comment Nos. 131-3 and 131-4. Refer to Response to Comment Nos. 131-3 and 131-4, above.

Comment Letter No. 569

Rob Vautherine
7800 Beverly Blvd.
Los Angeles, CA 90036-2112

Comment No. 569-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 569-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 570

Rochelle Ventura
6236 W. Fifth St.
Los Angeles, CA 90048-4726

Comment No. 570-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 570-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 571

Ryan Vermilion
401 W. Ogden Dr.
Los Angeles, CA 90036-1735

Comment No. 571-1

I'm writing to comment on the draft EIR for the proposed project at the Television studios.

Response to Comment No. 571-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 571-2

I am very concerned about the amount of traffic this will produce in the area.

Response to Comment No. 571-2

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

This comment expresses a general concern on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 571-3

I heard about some kind of mobility hub, which sounds like a bus or transit station. So which is it—are they going to have studios and stages, or will it be an office building, or is it going to some kind of transit center? And I heard there will be outdoor events too? So it is going to be concern [sic] venue? What else are they planning to do with the property?

Response to Comment No. 571-3

This comment is identical to a portion of the first paragraph of Comment No. 131-2. Refer to Response to Comment No. 131-2, above.

Comment No. 571-4

What is going to be the effect in the surrounding neighborhoods of all those different things going onto the site? All this information needs to be made clear to residents and businesses. They are ones that will be affected by this project.

There are too many unknowns for those of us in the community to really understand and weigh in on this plan.

Will they be allowed to build anything taller than what is there now? What are the height requirements? Is there a limit to how big any of the buildings can be?

Response to Comment No. 571-4

This comment is identical to the last three paragraphs of Comment No. 131-2. Please refer to Response to Comment No. 131-2, above.

With respect to building heights, as part of the Specific Plan, height zones with specified height limits would be established to regulate building heights throughout the Project Site. Refer to the discussion of height zones in Section II, Project Description, of the Draft EIR, pages II-17 through II-20. As discussed therein, maximum heights would vary by zone, but the maximum height within the Project Site would be 225 feet in up to 40% of the Height Zone D area.

Comment No. 571-5

They need to narrow down what it is they are doing and then send the plan to go through the process again. When will that process happen? If the plan is updated with more detailed information, will you recirculate to the community?

This is a massive project, and more information is needed.

Response to Comment No. 571-5

This comment is identical to Comment Nos. 131-3 and 131-4. Refer to Response to Comment Nos. 131-3 and 131-4, above.

Comment Letter No. 572

Greg Wachs

Comment No. 572-1

I would like to comment on this project.

Response to Comment No. 572-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 572-2

The project is supposed to have 5,300 parking spaces. There will be thousands more employees than that working there. Those of us who live here know that our parking spaces fill up whenever there is a show taping. Where will people park? They will fill up our neighborhood streets with parking.

We have older people here that sometimes have to walk several blocks to get home. That isn't right. Visitors and employees should have to pay for their own parking and not use the already limited parking in our neighborhood. How will the developer of this project make sure of this? How will that situation be monitored? It is not enough to just tell the neighborhood not to worry, it won't happen. Of course it will, and my neighbors and I all know it.

This project should not proceed until we know where they intend all their employees and visitors to park.

Response to Comment No. 572-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer also to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the development process for the NTMP to minimize the Project's potential effects

related to cut-through trips, as well as consider parking controls to prohibit and control Project parking within the neighborhoods.

Comment Letter No. 573

Shelley Wagers
6507 W. Fifth St.
Los Angeles, CA 90048-4711

Comment No. 573-1

I oppose the redevelopment of CBS Television City as currently proposed. The project will devastate a cherished Los Angeles neighborhood.

The voluminous Draft Environmental Impact Report fails to adequately address the scale of the project and major risks that it poses to the community. My objections include:

Response to Comment No. 573-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 573-2 through 573-8.

Comment No. 573-2

(1) Scale. The scope of this Project is out of scale and will further strain infrastructure and community services that are already overburdened.

Response to Comment No. 573-2

This comment is similar to Comment No. 100-2. Refer to Response to Comment No. 100-2 regarding the Project's scale and impacts to infrastructure and public services.

Comment No. 573-3

(2) Traffic. Walkable neighborhoods would be less safe for pedestrians. Cut-through traffic from a huge number of employees commuting through our neighborhood would choke residential streets. Construction lasting for up to 20 years would gridlock major intersections.

Response to Comment No. 573-3

This comment is similar to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 573-4

(3) Housing. The project lacks an affordable housing component (or any housing component). The Project would employ about 8,000 workers. Adding thousands of new workers without corresponding housing would dramatically inflate area rents.

Response to Comment No. 573-4

This comment is similar to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 573-5

(4) Stability of soil and water. The DEIR does not adequately study the impacts of soil destabilization and depletion of the water table in a seismically active area.

Response to Comment No. 573-5

This comment is substantively similar to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 573-6

(5) Regional Center designation. A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. The developer is evasive about the actual consequences of the designation they are asking for.

Response to Comment No. 573-6

This comment is similar to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 573-7

(6) Duration. The development has a projected construction timeline of 20-years with a deluge of negative impacts including traffic, air quality, and soil destabilization from dewatering.

Response to Comment No. 573-7

Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 573-8

In place of a detailed plan that specifies exactly what Hackman Capital will build, the application offers a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

Response to Comment No. 573-8

This comment is identical to a portion of Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment No. 573-9

The DEIR does not fully analyze and mitigate the negative impacts the proposed redevelopment will have on the surrounding community. The city should require a more rigorous and forthright environmental review.

Response to Comment No. 573-9

Refer to Response to Comment Nos. 573-2 through 573-8. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 574

Elaine Waldman
elainejulie.waldman@gmail.com

Comment No. 574-1

I have respected your work for decades: you care about workers and tenants and their health.

Response to Comment No. 574-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 574-2

We don't need a massive development at the Television City location. I live in Park la Brea and my neighbors, family, and I would be impacted negatively by this huge-scale project. Noise, poor air quality, gridlock, and higher rents: we don't need this construction and this scale of development!

Response to Comment No. 574-2

This comment provides a general statement of concern regarding noise, air quality, and traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Sections IV.I, Noise; IV.A, Air Quality; and IV.K, Transportation, of the Draft EIR for discussions of noise, air quality, and transportation impacts, respectively. Rent is not a CEQA consideration and is not addressed in the Draft EIR. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 574-3

Please spend more time on quality and environmental review, and keep your legacy of health and safety alive!

Response to Comment No. 574-3

Refer to Response to Comment No. 574-2. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA.

Comment No. 574-4

Thanks, Paul. Have a good day!

Response to Comment No. 574-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 575

Michelle Wang
439 1/2 N. Stanley Ave.
Los Angeles, CA 90036-2301

Comment No. 575-1

As a resident of the Beverly Fairfax neighborhood, I felt led to share my thoughts on the Television City project's Draft Environmental Report.

Response to Comment No. 575-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 575-2 through 575-4.

Comment No. 575-2

I am primarily concerned about the EIR's on-site and off-site parking plan for TVC employees, visitors, and construction. I am left with several questions about this plan. I ask that the city and the developer review my questions and respond back to this letter with answers.

Response to Comment No. 575-2

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Comment No. 575-3

Firstly, I am worried about the EIR's mentioning of off-site parking. Currently, it claims that 5,000 parking spaces are needed. It's clear that there can be more than 5,000 employees, visitors, and construction workers on any given day, so what is the city's plan for off-site parking? Which neighborhoods will this off-site parking be in? Will you build additional parking lots, or will you take away street parking for this project? How will I be notified about these developments? How soon will I be notified?

Response to Comment No. 575-3

Refer to Response to Comment No. 575-2. Noticing for the Project has been conducted in accordance with CEQA requirements as discussed in Response to Comment No. 32-3. Following publication of this Final EIR, the EIR and Project entitlements will be considered at several public hearings and meetings before City decision-makers prior to certification and approval.

Comment No. 575-4

Secondly, I think the current parking impact analysis is insufficient. These extra cars will have several major consequences. I am mostly worried about the noise, air quality, and pedestrian safety consequences this project could create. What kind of noise analysis has been conducted? What kind of mitigation measures will be put in place to ensure parkers won't be on-site late at night and early in the morning? Cars in off-site parking areas will greatly diminish the air quality in Beverly Fairfax. Have proper studies been conducted to evaluate this impact? What kind of contaminants will residents be exposed to, specifically? I am also extremely worried about the safety of our pedestrians. Moving cars to off-site parking areas can jeopardize the safety of the thousands of people that walk in our neighborhoods each day. What kind of steps will be taken to ensure their safety? Would the developer be open to building sidewalks to offset this negative consequence?

Response to Comment No. 575-4

Refer to Response to Comment No. 575-2 regarding parking. Section IV.I, Noise, of the Draft EIR provides a detailed discussion of potential noise impacts associated with the Project and concludes that, while the Project would result in short-term construction noise impacts, no operational noise impacts, including impacts from on-site parking, would occur. Regarding air quality, as discussed in Section IV.A, Air Quality, of the Draft EIR, no localized air quality impacts would occur because of construction or operation of the Project. Regional NO_x emissions would, however, be significant and unavoidable. Regarding contaminants, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, operational impacts associated with hazards would be less than significant, and construction impacts would be less than significant with implementation of mitigation measures. Regarding pedestrian safety, refer to Topical Response No. 12, Safety and Congestion. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 575-5

Ultimately, I think that this project and its parking needs are not compatible with the Beverly Fairfax community. Given the vague language in the DEIR, I am currently unable to

support this project. As a result, I hope that the city and the developer will read and answer my questions.

Response to Comment No. 575-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 575-2 through 575-4.

Comment Letter No. 576

John Ward
156 S. Gardner St.
Los Angeles, CA 90036-2718

Comment No. 576-1

I am writing to you to express my concerns regarding the Draft EIR (ENV-2021-4091- EIR) for the TVC 2050 Project.

As a member of the community for over 35 years, I am concerned that projects with significant and unavoidable impacts are being processed through the entitlement process rather hastily and with little regard to community impacts. How many environmental impact reports have been processed within the last five years within the Wilshire Community Plan area? How many of those environmental impact reports have been adopted with a statement of overriding consideration for significant and unavoidable impacts to air quality, noise, etc.? Who monitors the cumulative impacts of all significant and unavoidable impacts of these environmental impact reports? Is this information available to the public and the decision-makers?

Response to Comment No. 576-1

Pursuant to Section 15093(a) of the CEQA Guidelines, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.” The commenter should note that the Project has not been approved by the City. Following publication of this Final EIR, the Project will be subject to public hearings and meetings, including meetings before the City Planning Commission and the City Council, during which the public will have the opportunity to provide comments about the Project.

With respect to cumulative impacts, as required by CEQA, each EIR and Initial Study includes a thorough analysis of cumulative impacts. As it pertains to the Project, Section III, Environmental Setting, of the Draft EIR includes a detailed discussion of cumulative impact analysis methodology and a list of 68 related projects that were considered in the cumulative impact analyses in the Draft EIR. Refer to pages III-7 through III-15 of the Draft EIR.

EIRs published by the City are available on the Department of City Planning’s website at <https://planning.lacity.org/development-services/eir>. The number of EIRs

published in the last five years is not a CEQA issue and is not related to the adequacy of the Project's EIR.

Comment No. 576-2

Those of us who actually live in the community will shoulder all the significant and unavoidable impacts of this project. Please explain how this project will benefit those of us who will endure poor air quality and noise impacts for years to come.

Response to Comment No. 576-2

Refer to Sections IV.A, Air Quality and IV.I, Noise of the Draft EIR regarding the Project's temporary impacts associated with air quality and noise, respectively. This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 576-3

Thank you for your attention to this matter. I look forward to your response to my questions and concerns.

Response to Comment No. 576-3

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 577

Margalete Ward
156 S. Gardner St.
Los Angeles, CA 90036-2718

Comment No. 577-1

I am a resident who lives near where Television City is being considered for a mammoth development, and I have many concerns about what that project would mean for our community.

Response to Comment No. 577-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 577-2 and 577-3.

Comment No. 577-2

What does it mean that the site could be a Regional Center? A regional center that would do what? Are there other areas in the city that are also regional centers? Would the regional center be the same boundaries as the Television City site or expand beyond just that development?

Does that mean that other projects would fall under the category of the area being a regional center, not just the one for Television City? Would other projects then not have to go through a thorough review? Would they just get approved or be allowed because they are part of some regional center area?

How does regional center then fit into the city's General Plan? What about the Wilshire Community plan?

It seems that it could lead to uncontrolled growth of our wonderful community. Is that what could happen? How much growth or density would be allowed? Would there be a limit as to how much development could happen?

If a regional center wouldn't be only the Television Center property, it doesn't seem right or fair that an expansion of that designation, which would be hugely impactful on our neighborhoods and community, would be imposed upon us, especially not with a full understanding by community members, businesses and residents of what it would mean.

By what right could the developer do that? On what basis could the city approve that? Is there anything that the residents and businesses can do about it?

Where is an any analysis and findings that our family oriented, small business community needs or wants to be any kind of a regional center?

Response to Comment No. 577-2

This comment is identical to Comment No. 80-2. Refer to Response to Comment No. 80-2, above.

Comment No. 577-3

I strongly urge you to oppose this development.

Response to Comment No. 577-3

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 578

Deryn Warren
166 N. Fuller Ave.
Los Angeles, CA 90036-2812

Comment No. 578-1

As a resident of the Fairfax area, I am disbelief that the city is considering making traffic an even larger issue. Having lived in this area for the past 15 years, my neighbors and I are very familiar with the day-to-day traffic and have learned to accept it as part of living in this community. However, a project of this size will simply exacerbate the issue in this area. I can't even imagine what a daily commute would look like with all these additional drivers. Will it be an additional 10,000+ drivers on the road? How many additional drivers should we expect each day?

Response to Comment No. 578-1

The total number of new trips per day expected to/from the Project Site is summarized in Table 13 on page 123 of the Transportation Assessment (Appendix M.1 of the Transportation Assessment). This summary shows approximately 9,733 net new trips per day, which would be spread out among Fairfax Avenue and The Grove Drive from the north and south and both Beverly Boulevard and 3rd Street from the east and west. Refer to Topical Response No. 10, Trip Generation.

With respect to operational trips, under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Comment No. 578-2

This area could physically not be more developed. Think of all the malls, the Grove and the Beverly Center. Countless people visit these areas daily and are lucky if their car moves a mile in 20 minutes. It is not possible to add thousands of extra cars, and this could potentially congest the intersections to the point of insanity. Not to mention all the extra pollution that will be emitted into the atmosphere from all this congestion. How do you expect commute time to differ for residents living in the area? How will citizens of the area get to their jobs in a timely manner? How will citizens take their kids to school or simply get from point A to point B?

Response to Comment No. 578-2

Pursuant to SB 743, traffic congestion is no longer a CEQA consideration. Refer to Response to Comment No. 578-1 and Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, regarding the non-CEQA LOS analysis in the Transportation Assessment.

Air quality analyses during both construction and operation of the Project have been completed and are included in Section IV.A, Air Quality, of the Draft EIR.

Comment No. 578-3

Does the city really believe that people are going to be willing to travel via bus or subway? After a global pandemic, LA has proved we will refuse to ride the subways. Even at the peak of the climate change movement, the city has failed to improve the public transportation systems. If the city is going to be so generous with development approvals, why is there no compromise when it comes to proactive traffic and congestion measures?

Response to Comment No. 578-3

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

Refer to Response to Comment No. 578-2 regarding traffic congestion.

Comment No. 578-4

Why are we expected to risk our safety on the buses or subway? A crowded transit vehicle seems like the perfect place for a COVID-19 outbreak to present itself once again. Not only this, but too much wait time, too many buses stuck in traffic and too many delays. But regardless, this project will force the majority of LA to travel this way which will be incredibly frustrating.

Response to Comment No. 578-4

This comment does not raise an environmental issue specific to CEQA or the Draft EIR and the environmental impacts addressed therein. Thus, no further response is required. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 578-5

I don't even understand how this project is plausible at all considering the site developers are intending on using far more space than the city allows.

We deserve answers.

Response to Comment No. 578-5

The Project's proposed Specific Plan would permit up to 1,874,000 square feet of floor area, and a finalized draft of the Specific Plan along with the other Project approvals will be considered by City decision-makers at public hearings following the publication of this Final EIR.

Comment Letter No. 579

Michael Warrenbarger
345 N. Fuller Ave.
Los Angeles, CA 90036-2522

Comment No. 579-1

The EIR says there will be thousands of trucks staged near Loyola High School. Thousands. Idling trucks spewing pollution near teenagers with developing brains. Why will those trucks be in that community? What regulations would allow that to happen? There are lots of people living there that don't make a lot of money. Has anyone looked at the environmental justice issues? Is that in the EIR? Where is the information about the impacts on people's health, not only from the trucks staged near the school but from all the truck traffic that will be coming?

Where have these possible consequences been identified and studied? If they haven't been yet, when are those studies going to be done?

Response to Comment No. 579-1

Please see Response to Comment No. 26-24 for a discussion of haul truck staging areas. As discussed therein, all haul truck staging would occur on-site per LADOT's recommendation letter dated June 30, 2022.¹⁶² The two off-site staging locations described and evaluated in the Draft EIR are no longer proposed and have been removed for consideration and evaluation. As such, an HRA is not warranted for sensitive receptors near the two removed off-site staging areas. The removal of the staging locations is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Refer to Response to Comment No. 26-E.1-21 for a discussion of the Draft EIR's analysis of localized air quality impacts. Additionally, as discussed in Response to Comment No. 26-E.1-2, in response to SCAQMD comment on the Draft EIR, a quantitative HRA was completed and is included as Appendix FEIR-10 of this Final EIR. As shown therein, health risk impacts would be less than significant, confirming the findings of the Draft EIR.

¹⁶² Refer to Appendix M.5 of the Draft EIR for the LADOT approval letter.

Comment No. 579-2

Is the city really thinking of permitting developers to dump its pollution on the poor in order to make a few bucks is wrong. This should not go forward until health risks are studied at the very least and alternatives are seriously considered.

Response to Comment No. 579-2

This comment is identical to Comment No. 349-2. Refer to Response to Comment No. 349-2, above.

Comment Letter No. 580

Andrew Watnich
941 N. Genesee Ave.
West Hollywood, CA 90046-7347

Comment No. 580-1

I have been a resident of the area for many years. I love the city for its many opportunities, landmarks and entertainment. With this being said, I feel as if there is a disconnect with you (the city planners) and the LA community when it comes to the TVC 2050 plan. I am simply appalled that the city would allow a project with such lack of foundation. Bringing jobs to the city and industry is important, but the impact of where and how that is done must be considered. In reality, it can take 20 minutes to travel a mile in LA rush hour traffic as is.

Response to Comment No. 580-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 580-2 through 580-4.

Comment No. 580-2

The EIR does not provide any explanation for how the city is going to handle this volume of people in the neighborhood, nor does it address this as a concern. Where is the city addressing the many effects of an influx of all those cars and people into the community? And why isn't the city seeing this as a major concern?

Response to Comment No. 580-2

The Transportation Assessment (Appendix M.1 of the Draft EIR) includes a thorough evaluation of both CEQA and non-CEQA transportation issues. Under CEQA, the Project was found to be consistent with existing plans and regulations for the Project Site and meet and exceed the target thresholds for work VMT per employee, indicating that the location of the Project is in the right place to reduce overall regional VMT. Thus, the Project's CEQA transportation impacts would be less than significant.

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and

Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

With respect to neighborhood intrusion, refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment.

Comment No. 580-3

The daily onslaught of construction trucks alone will cause major congestion on the roads even more. The EIR promised a detailed construction traffic management plan, but where is it? How long will it take to be released to the public? What will the plan cover? When the community be able to give input into that plan?

Response to Comment No. 580-3

Refer to Topical Response No. 14, Construction Vehicle Impacts, for a discussion of the elements included in the CTMP.

Typically, the CTMP is outlined in the Draft EIR and the detailed CTMP is presented to LADOT for review and approval as a requirement prior to the issuance of the first building permit at the start of construction. Refer to page IV.K-36 and IV.K-37 of the Draft EIR and Topical Response No. 14, Construction Vehicle Impacts, for discussions of the elements included in the CTMP.

Typically, the development and the approval of the CTMP is handled at the technical staff level with approvals by LADOT and perhaps the Bureau of Engineering.

The NTMP is the planning element that would be developed by the neighbors, the Applicant, and LADOT.

Comment No. 580-4

I understand there will be a large amount of parking being added near our houses, not only for new employees but also people traveling to Television City for events. This is greatly increasing the amount of strangers my children will encounter in our community on a daily basis. How many cops are going to be available for this events? Will additional officers be available if something does happen? Is the city willing to take the extra steps to fund protection of our families? What is going to happen when ambulances, police cars, fire trucks and any other emergency vehicles need to get through to the site and there is absolutely no way for them to because of being stuck in traffic?

Response to Comment No. 580-4

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking. Accordingly, as discussed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, the off-site parking agreement language was deleted from the Draft EIR.

Given the operation of the Project Site, the fact that full parking demand for the Project can be accommodated on-site and pick-up/drop off activities can be accommodated in the Mobility Hub, it is not expected that Project employees or visitors would park or walk through the adjacent neighborhoods.

The Project also includes a number of PDFs that would enhance safety on the Project Site, including Project Design Feature POL-PDF-2, which requires a 24/7-security plan.

Refer to Topical Response No. 12, Safety and Congestion, for information regarding emergency response times. As described therein, the Project would not increase the number of LOS E or F intersections along the key corridors serving either of the two closest fire stations to the Project Site. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Comment No. 580-5

At what point is it too much? Where will the line be drawn? Are there no limits anymore in the city of LA? How will this project be in compliance with zoning, health, police, fire and hazardous material laws? Please provide those specifics. I cannot support this project in its current state. There are too many unanswered questions, and our community deserves full transparency.

Response to Comment No. 580-5

The issues raised by the commenter are fully analyzed in the Draft EIR. Refer to Draft EIR Section IV.H, Land Use and Planning, for a discussion of zoning; Section IV.J.1, Public Services—Fire Protection, for a discussion of fire protection; Section IV.J.2, Public Services—Police Protection, for a discussion of police protection; and Section IV.F, Hazards and Hazardous Materials, for a discussion of hazardous materials.

It is unclear what the commenter means by “health,” but impacts related to human health are addressed in Section IV.A, Air Quality, and Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. Refer also to the quantitative HRA in Appendix FEIR-10 of this Final EIR.

Comment Letter No. 581

Rosalie Wayne
8140 Blackburn Ave.
Los Angeles, CA 90048-4424

Comment No. 581-1

The above-referenced Project will negatively impact and irrevocably change my neighborhood. The DEIR does not adequately analyze or mitigate these negative impacts. If this project goes forward as proposed, my community will be unrecognizable. The scope of the proposed Project requires a voluminous Draft Environmental Impact Report. The city and the community deserve adequate time to evaluate it. For the following reasons, I do not support this Project as currently proposed.

Response to Comment No. 581-1

This comment is identical to Comment No. 100-1. Refer to Response to Comment No. 100-1, above.

Comment No. 581-2

- (1) The scope of this Project is too large and will result in a strain on an already overburdened infrastructure and community services that are already taxed.

Response to Comment No. 581-2

This comment is identical to Comment No. 100-2. Refer to Response to Comment No. 100-2, above.

Comment No. 581-3

- (2) Traffic would be negatively impacted. As a result, our once walkable neighborhoods will be less safe for pedestrians, our residential streets will be more congested as a result of cut through traffic, and our commutes longer as a result of gridlock resulting from the proposed 20-year construction as well as the fact that a large number of employees will inevitably be commuters.

Response to Comment No. 581-3

This comment is identical to Comment No. 100-3. Refer to Response to Comment No. 100-3, above.

Comment No. 581-4

- (3) There is a lack of an affordable housing component (or any housing component). The Project will employ approximately 8,000 workers, but includes no housing whatsoever. Adding 5,700 new workers without corresponding housing, [sic] will put enormous pressure on area rents.

Response to Comment No. 581-4

This comment is identical to Comment No. 100-4. Refer to Response to Comment No. 100-4, above.

Comment No. 581-5

- (4) The DEIR does not sufficiently analyze the impacts of soil destabilization on a seismically active area.

Response to Comment No. 581-5

This comment is identical to Comment No. 100-5. Refer to Response to Comment No. 100-5, above.

Comment No. 581-6

- (5) A “Regional Center” does not belong in our neighborhood. It is the same designation as Century City and Downtown Los Angeles. This Project would add almost 2,000,000 square feet of development (including 1.4 million square feet of offices) and 20-story towers, an enormous increase over the size of current operations. The development has a projected construction timeline of 20-years [sic] which will result in a deluge of negative impacts including, but not limited to, traffic, soil destabilization as a result of dewatering, and air quality issues.

Response to Comment No. 581-6

This comment is identical to Comment No. 100-6. Refer to Response to Comment No. 100-6, above.

Comment No. 581-7

The DEIR does not adequately analyze and mitigate the negative impacts the proposed Project will have on the surrounding community. In place of a detailed plan that specifies exactly what Project applicants will build, Project applicants offer a “conceptual” site plan that gives them unprecedented flexibility over a 20-year period. In place of a project that

conforms to prevailing regulations—or even one that asks for specific zoning changes—they want to declare the site “a regional center” that writes its own rules. Their window-dressing cannot disguise the burden they would impose on an area that already suffers some of the worst congestion and traffic in the city.

I respectfully request a more vigorous environmental review in the areas discussed.

Response to Comment No. 581-7

This comment is identical to Comment No. 100-7. Refer to Response to Comment No. 100-7, above.

Comment Letter No. 582

Emma C. Webster
335 S. Orange Dr.
Los Angeles, CA 90036-3008

Comment No. 582-1

As a resident of LA, and a concerned citizen, I am writing to ask about the Television Studio project and information outlined in the EIR.

Response to Comment No. 582-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 582-2

The project is proposing to stage thousands of trucks next to Loyola High School and Kaiser Hospital. This seems inappropriate to stick thousands of trucks in these communities. Have these residents been told that there may be 60,000 trucks idling and driving through their communities? How was it decided to use that area? Are you aware there is a recreation center right by Loyola High School and a historic cemetery? This area by Loyola in particular is a lower income community. What are your plans for restoring this community and what specific thing will be done to assist residents in the area during the time of construction?

Response to Comment No. 582-2

There is no longer a plan to stage trucks near Kaiser Hospital or Loyola High School. All haul truck staging locations would be provided on-site; accordingly, no haul trucks would be idling off-site. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR. No construction traffic impacts would occur near Loyola High School and Kaiser Hospital.

Comment No. 582-3

It is risky and harmful to the environment to excavate. The excavation will release gases to the environment and greatly impact those in surrounding areas. The health of the community should be taken into consideration. Did the EIR evaluate the amount of gases that will be released as a result of excavation? Where is that in the analysis? And it is wasteful to pull out all that groundwater. We have seen how drinking contaminated water

has adversely affected the lives of many in the nation. What impact does take that water have on the use of that groundwater for drinking water?

Response to Comment No. 582-3

Refer to Response to Comment Nos. 13-4, 13-6, 16-28, 16-64, and 26-E.3-4 regarding excavation, groundwater quality, and subsurface gases. Please note that excavation in a methane zone does not increase the amount of methane that is released as a result of natural conditions. There is a consistent rate of off-gassing regardless of excavation.

Project construction will require temporary dewatering that is expected to last approximately 21 months and not permanent dewatering. The proposed below-grade parking structures will be designed to resist the hydrostatic pressure, such that a permanent dewatering system (post-construction dewatering) will not be required. The groundwater that is removed during construction will be discharged off-site pursuant to a discharge permit. Also, there are no supply wells (i.e., pumping wells) within one mile of the Project Site, and thus the local, temporary dewatering will not interfere with any existing supply wells. As described in Response to Comment No. 11-25, the estimated quantity of groundwater removed by dewatering is expected to be a very small percentage (less than 0.1 percent) of the Hollywood Subbasin storage capacity in which the Project Site overlies.

Comment No. 582-4

As we continue to look at water and how the environment will be affected, we feel that sustainability should be upheld. According to the EIR, after the Project is fully built, total water use would be about 6x more than it is currently. Why is this not considered a significant impact, especially when California is in a severe drought and drought conditions are likely to continue? Also, how does the EIR's water use calculations account for the different types of uses that could occur on the property?

Response to Comment No. 582-4

Refer to Response to Comment No. 16-66 with regard to the adequacy of water supply and consideration of drought conditions, Response to Comment No. 223-2 with regard to the types of water demand associated with the Project, and Response to Comment No. 292-2 with regard to the threshold for a significant impact related to water demand under CEQA.

Comment No. 582-5

To my understanding, every project should be in the betterment of the community. However, based off the EIR, the Television Studio Project is more detrimental than [sic] helpful to the community and environment.

Response to Comment No. 582-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 583

Nick Wechsler
347 N. Gardner St.
Los Angeles, CA 90036-5700

Comment No. 583-1

As a resident of the neighborhood for the past 15 years,

Response to Comment No. 583-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 583-2

I have been trying to clearly understand what is being proposed in this 25 acre spread. It's hard to make out what the proposed buildings will look like, given that all we know is that 20-story buildings are allowed. But we haven't been shown where they will be actually located or even how big they will be in terms of square feet. What will the density be? Is it all office building? Is more office space even needed in LA?

Please provide clarity as to what will be built and where.

Response to Comment No. 583-2

This comment is similar to Comment No. 170-2. Refer to Response to Comment No. 170-2 regarding the Project Description, massing, and locations of the proposed buildings.

Comment No. 583-3

And when will the phases start and end?

Response to Comment No. 583-3

Refer to Response to Comment No. 9-24 regarding the Project timeline.

Comment No. 583-4

This project seems like a black box—the community is supposed to express our support for something but we don't have enough information to make an informed decision.

Response to Comment No. 583-4

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan. As discussed in these responses, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. Further, the Draft EIR fulfilled CEQA's informational purpose by disclosing all of the elements of the Project required by CEQA and providing a comprehensive analysis of the Project.

Comment Letter No. 584

Douglas Weinstein
bakeryoperations@diamondbakeryla.com

Comment No. 584-1

I am writing to ask the City to please support Television City's plan to invest in the studio and in the entertainment industry. This project will generate thousands of good paying entertainment jobs and keep them in Los Angeles. For more than 70 years, Television City has demonstrated a commitment to the community, and now it is the City's turn to permit them to flourish in the future.

This plan will allow the studio to improve its facilities with new, modern stages and production space while preserving and rehabilitating its historic resources onsite. They will also invest in the community by providing streetscape beautification and new transportation improvements connecting the neighborhood to public transit options.

I love the history of the Beverly/Fairfax District and feel Television City is a very important part of what makes this neighborhood so special. The studio is willing to invest in improving its facilities to stay competitive in an industry that changes all the time. I hope the City will let them continue to be successful, providing good jobs, supporting local businesses and organizations, and producing great entertainment in our back yard.

And let's be honest about the condition and state of Beverly/Fairfax, it's a mess. The streets and sidewalks are littered and dirty, the streets need to be resurfaced, the graffiti is out of control the homeless problem is not only a humanitarian disaster but it is infringing on the rights of tax paying citizens by occupying the sidewalks and alleys, digging through dumpsters and leaving the mess for the city to clean, the vandalism and personal assaults that occur are diminishing the area's appeal. The foot traffic on our block has nearly dried up.

Help the revenue generating entities to make a positive impact on our community at least as much as you allow the homeless destroy it.

Response to Comment No. 584-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 585

Ahuva Weisbaum
8318 W. Fourth St.
Los Angeles, CA 90048-4203

Comment No. 585-1

I am writing to comment on the CBS Television City expansion. As a 50 year resident of the neighborhood, I have seen a lot of change. This one is the largest and most serious to date.

Response to Comment No. 585-1

This comment is identical to Comment No. 86-1, but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 585-2

I would love to provide feedback on the project, but the draft EIR says the plan is still conceptual and the applicant would be given flexibility. My understanding is this is why the applicant is asking for a 20-year development agreement. I am deeply concerned that this project has made it this far in the process, but we don't have an actual specific plan to review.

Response to Comment No. 585-2

This comment is identical to the first paragraph of Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment No. 585-3

The proposal only has 5,300 parking spaces. This facility will be staffed by 8,000 employees and will also bring with it and thousands of audience members as well, where will the overflow parking be and has that even been studied?

Response to Comment No. 585-3

This comment is identical to Comment No. 341-3. Refer to Response to Comment No. 341-3, above.

Comment No. 585-4

This project is projected to need 60,000 truck trips to complete its construction. The city does not lay out if it has studied how the proposed staging area for these trucks will affect Loyola High school, Kaiser hospital, the Holocaust Museum, or the historic cemetery. I would ask that each of these important community assets be studied individually so that we can clearly see how the community will be changed.

Response to Comment No. 585-4

This comment is identical to Comment No. 341-4. Refer to Response to Comment No. 341-4, above.

Comment No. 585-5

When will the community be allowed to give public input and weigh in on the actual design, not a plan that says things like the company “may make improvements” or could be two decades of construction?

How much further will the project progress before we are provided the detailed information we deserve?

Response to Comment No. 585-5

This comment is identical to the second and third paragraphs in Comment No. 86-2. Refer to Response to Comment No. 86-2, above.

Comment Letter No. 586

Roland White
12408 Lemay St.
North Hollywood, CA 91606-1358

Comment No. 586-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 586-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 587

Thayer Wiederhorn

Comment No. 587-1

I'm trying to figure out how the Draft EIR will mitigate the massive traffic problems this studio project will generate. Not only are thousands of construction and production trucks going to be rolling in and out of the site for the next 20 years, but thousands of passenger cars will be entering and leaving the site every day too.

Response to Comment No. 587-1

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

The Project's transportation impacts were comprehensively analyzed in Section IV.K, Transportation, of the Draft EIR in accordance with CEQA and were determined to be less than significant during both construction and operation of the Project. Thus, mitigation is not required, as incorrectly stated in this comment.

Refer to Topical Response No. 14, Construction Vehicle Impacts, and Response to Comment Nos. 32-6, 107-2, and 124-6 regarding construction trips. Refer to Response to Comment No. 9-24 regarding the buildout timeline.

Comment No. 587-2

What are the anticipated traffic patterns? Are all of the trucks supposed to use Grove and Fairfax? What happens if a huge truck jackknifes and/or the trucks block intersections? Why doesn't the project have any dedicated lanes to get trucks and cars off the street?

Response to Comment No. 587-2

Figure 21 on page 77 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the patterns of the Project trips. The figure shows the assignment of Project trips through each of the 31 study intersections. Refer to Response to Comment No. 9-31 regarding trip distribution.

Refer to Response to Comment No. 83-1 regarding turn lanes.

Refer to Response to Comment No. 26-E.4-15 regarding truck turns and maneuvering.

Comment No. 587-3

Please analyze the ability of the project to mitigate traffic congestion, alternative plans if there are any, and an analysis of whether dedicated right lane-only turn lanes would be helpful.

Response to Comment No. 587-3

Refer to Response to Comment Nos. 587-1 and 587-2 for a discussion of construction traffic impacts and turn lanes.

Comment Letter No. 588

Anne Williams
157 N. Gardner St.
Los Angeles, CA 90036-2719

Comment No. 588-1

I am a resident of this neighborhood since 1987 and I am writing to you because I feel the Draft EIR did not adequately define "The Project."

Response to Comment No. 588-1

The Project Description meets the requirements of CEQA. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the adequacy of the Project Description.

Comment No. 588-2

I reviewed the executive summary and then the project description but I still do not know what the project is. There are multiple caveats throughout the Draft EIR indicating that the project is only conceptual. How is the public supposed to comment on a "make-believe" project if it is subject to change. If the conceptual project changes, then our comments on the Draft EIR would be useless and a waste of time.

If the project is only conceptual, when will the public have an opportunity to comment on the "real" project and its environmental impacts? When will the community be advised of any modifications to the conceptual project? Will this information be posted on a website? Should the project's proposed development agreement be approved, does that mean that the community may have to wait decades to be informed of the actual project?

Please define the project in concrete terms and recirculate the Draft EIR so the public has an opportunity to make productive comments on impacts to the community.

Response to Comment No. 588-2

This comment is identical to Comment No. 260-2. Refer to Response to Comment No. 260-2, above.

Comment Letter No. 589

James Williams
Marc Wenderoff
6410 W. Fifth St.
Los Angeles, CA 90048-4710

Comment No. 589-1

We have lived in this community for 24 years and are completely opposed to this project.

Response to Comment No. 589-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 589-2 through 589-5.

Comment No. 589-2

Not only do the height maps allows buildings up to 20 stories in some areas and 15 stories in other areas but it's not at all clear where they will be.

Response to Comment No. 589-2

This comment is similar to Comment No. 170-2. Refer to Response to Comment No. 170-2 regarding building heights and locations.

Comment No. 589-3

With the influx of thousands of cars and wildly insufficient parking spots, both parking and traffic problems will be increased exponentially.

Response to Comment No. 589-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the

on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, the Project no longer proposes off-site parking; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

Comment No. 589-4

The noise pollution will be horrible when all 14 of those stages are holding events and concerts, and the light pollution from the billboards at nighttime will not only bother us but disorient birds and bat species.

Response to Comment No. 589-4

Section IV.I, Noise, of the Draft EIR fully analyzed potential noise impacts associated with Project related on-site noise sources, including outdoor uses (people talking and amplified sound) and outdoor production activities. Refer to pages IV.I-44 through IV.I-46 in Section IV.I, Noise, of the Draft EIR. As discussed therein, noise impacts associated with outdoor uses would be less than significant. The Project does not propose a concert venue. Refer to Response to Comment No. 213-4 with regard to potential lighting impacts on wildlife. Please note that the proposed Sign District would prohibit billboards.

Comment No. 589-5

Nothing about the project seems energy efficient.

Response to Comment No. 589-5

This comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer to Response to Comment Nos. 45-1 and 77-4 which detail the sustainability features included in the Project and how new natural gas would not be used as part of the Project (with certain exceptions) consistent with the City's new all-electric buildings ordinance.

Comment No. 589-6

This project needs to be reconsidered from the very beginning.

Response to Comment No. 589-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 589-2 through 589-5.

Comment Letter No. 590

Barbara Wilson
144 N. Detroit St.
Los Angeles, CA 90036-2916

Comment No. 590-1

Please see my comments below:

Response to Comment No. 590-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 590-2

- According to Footnote 3 in the Project Description of the Draft EIR, the Southern Shared Access Drive (depicted on Figure II-3) is privately owned. Who owns this drive? Please explain how the developer can use this private drive if they do not own it in its entirety. It seems that there will be a substantial increase in vehicular and pedestrian activity along the Southern Shared Access Drive given that it is anticipated to be used for commercial delivery trucks, motor vehicles, and pedestrians. What safety measures will be put in place to ensure the Southern Shared Access Drive is not overwhelmed with so much activity that it becomes a hazard to pedestrians?

Response to Comment No. 590-2

Refer to Response to Comment No. 9-29 regarding traffic hazards.

Vehicles and pedestrians currently have access along the Southern Shared Access Drive. The Project has joint access rights to the Southern Shared Access Drive, and the two vehicular driveways proposed onto the roadway are in the southeast quadrant of the Project Site.

Figure 22 on page 80 of the Transportation Assessment (Appendix M.1 of the Draft EIR) shows the assignment of Project trips to the Southern Shared Access Drive. The Southern Shared Access Drive is a lightly used driveway to the Project Site. Only approximately 55 trips in the morning peak hour and approximately 59 trips in the afternoon peak hour are expected to enter or leave the Project Site via the Southern Shared Access

Drive. Compare this number to approximately 400 trips in each peak hour using The Grove Drive driveway.

The intersection of the Southern Shared Access Drive with The Grove Drive would be controlled by a stop sign and signalized pedestrian crosswalks across the Grove Drive would be available at intersections to both the north and the south close to the Southern Shared Access Drive. The Project intends to construct a sidewalk along the north side of the Southern Shared Access Drive to connect The Grove Drive to the Project's pedestrian entrance. Given the light vehicle volumes, the Southern Shared Access Drive is not expected to be a hazardous location for vehicles or pedestrians.

Comment No. 590-3

- Noise impacts are concerning. The Draft EIR has identified significant and unavoidable noise impacts related to construction off-site noise and off-site vibration (human annoyance). If a 20- year development agreement is approved, does that mean that adjacent residential uses will have to endure these significant and unavoidable impacts for years? Since the project is conceptual, how will the public be informed of any changes to these noise impacts as a result of any modification to the conceptual project?

Response to Comment No. 590-3

Refer to Response to Comment No. 9-24 regarding the construction timeline and Response to Comment No. 26-138 for a discussion of the construction timeline as it relates to noise.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 5-5 with regard to the Project Description and proposed Specific Plan and the conceptual nature of all plans in an EIR. As discussed in these responses, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. As discussed in Response to Comment No. 26-135, the Draft EIR noise analysis was based on the Conceptual Site Plan, and future changes that are substantially different than the Conceptual Site Plan or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

As discussed on pages IV.I-34, IV.I-35, and IV.I-56 in Section IV.I, Noise, of the Draft EIR, a number of PDFs and a mitigation measure are proposed to address construction noise. In addition, as discussed on pages IV.K-36 and IV.K-37 in Section IV.K, Transportation, of the Draft EIR, in accordance with Project Design Feature TR-PDF-1, the Project will include a CTMP that will include a provision that the Applicant will designate a construction relations officer to serve as a liaison with the surrounding community and respond to any construction-related inquiries, including those related to construction noise.

Comment No. 590-4

- The project proposes two construction scenarios, a three-year and 20-year construction schedule. If the buildout year is extended to 2043, why is the project title include “2050”? Is this the anticipated sunset year for the proposed Specific Plan? Why is it not 2043? If the project is completed within the 32-month period, how will that affect the sunset year of the Specific Plan, if there is

one. Since the Specific Plan was not included, this information was not available for public review.

Response to Comment No. 590-4

Refer to Response to Comment No. 9-24 with regard to the Project timeline, which, as discussed in that response, could extend until 2043. If approved, the proposed Specific Plan would continue to govern the Project Site after the Project has been constructed (there is no sunset year).

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3 with regard to the Project Description and proposed Specific Plan. As discussed therein, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment Letter No. 591

Justin Wilson
144 N. Detroit St.
Los Angeles, CA 90036-2916

Comment No. 591-1

Please see my comments and questions below:

Response to Comment No. 591-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 591-2

It seems that there is so much flexibility built into the proposed project that the public doesn't really know what is being proposed. If a project is conceptual, what is the public commenting on? A project by its very definition is something that is concrete. The dictionary defines project as "a collaborative enterprise that is carefully planned to achieve a particular aim." If the aim was to confuse the reader, then the aim has been achieved. Please explain how a conceptual project provides any real information to the public.

Response to Comment No. 591-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3, 5-5, 9-12, 9-13, and 9-15 with regard to the Project Description and proposed Specific Plan, the conceptual nature of all plans in an EIR, the level of detail required for a specific plan project EIR, how the Project Description discloses all of the elements of the Project required by CEQA, and the regulatory process under the proposed Specific Plan. As discussed in these responses, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project. As also discussed in these responses, the the proposed Specific Plan would include a regulatory framework for implementation of the Project, including, among other things, mandatory review processes by the City for implementation of the proposed Project. Future changes that are substantially different than the Project or are beyond the scope of impacts evaluated in the EIR would require additional discretionary City review and approval, as well as potential CEQA compliance review.

Comment No. 591-3

Several significant documents were blatantly omitted from the Draft EIR. Where is the Specific Plan that includes all the land use regulations of the conceptual project? It would have been helpful to have the document for review so the public can fully understand how the project's land use regulations have the potential to impact the surrounding neighborhoods and community. Why was it not included?

Response to Comment No. 591-3

Refer to Response to Comment No. 591-2. As discussed in Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 5-3, neither CEQA nor City policy requires a draft Specific Plan to be included in the Draft or Final EIR. Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available on the Department of City Planning's website prior to the publication of this Final EIR.

Comment No. 591-4

Further, there were references to the Sign Program, but yet again, the document was not included in the Draft EIR. The impacts of signage are important to residents who live adjacent to the proposed project. Please explain why this document was not included in the Draft EIR.

Response to Comment No. 591-4

Refer to Response to Comment No. 5-10 regarding the physical elements of the proposed Sign District (e.g., sizes, types, locations, maximum square footage, illumination, etc.) that were fully described in the Draft EIR. Refer also to Topical Response No. 1, Clearly Defined Project Description and Specific Plan. As discussed therein, the Draft EIR disclosed all elements of the proposed Sign District required by CEQA, and the Sign District is not necessary for the environmental analysis of the Project. Nevertheless, in response to comments on the Draft EIR, a proposed Sign District has been made publicly available on the Department of City Planning's website concurrent with the publication of this Final EIR.

Comment No. 591-5

Please recirculate the Draft EIR so that there is a defined project what will not morph into something entirely different. Also include all documents referenced in the Draft EIR that were not included in the appendices as is required by CEQA.

Response to Comment No. 591-5

Refer to Response to Comment Nos. 591-2 through 591-4. As demonstrated therein, the Draft EIR meets the requirements of CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment Letter No. 592

Kathy Wilson
104 N. Orange Dr.
Los Angeles, CA 90036-3015

Comment No. 592-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 592-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 593

Rachel Wilson
7309 Atoll Ave.
North Hollywood, CA 91605-4107

Comment No. 593-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 593-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 594

Paul Witt
Deborah Welsh
Mindy Lake
West 3rd Street Business Association
119 N. Fairfax Ave., #246
Los Angeles, CA 90036-2110

Comment No. 594-1

On behalf of The West 3rd Street Business Association, we want to express our support for TVC 2050—The Los Angeles Studio Plan.

The W3SBA is an organization of shops, restaurants and independent specialty stores located on W. Third Street between La Cienega and Fairfax, near the studio. The studio has been in touch with us on several occasions regarding the progress of their plans and we appreciate their efforts to engage with neighborhood stakeholders. Our group has enjoyed a positive working relationship with Television City and believes this project will have a beneficial impact on the Beverly/Fairfax District and the surrounding neighborhood.

We recently met with Television City and were shown the draft environmental impact report which showed that the plan is designed in a way that it will create no significant impacts during operations. We also appreciate that it will preserve its historic cultural monument onsite and has earned the support of the Los Angeles Conservancy. In addition, we were glad to hear the plan will improve internal circulation for production vehicles and trucks as well as create parking and production “basecamps” onsite.

We welcome this major investment in our neighborhood to an industry icon that’s so important to the city. We feel the modernization and improvement of this large production facility is much needed and will surely enhance the economic growth and security of our community.

Response to Comment No. 594-1

This comment indicating support for the Project is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 595

C. Wittenberg
318 S. Mansfield Ave.
Los Angeles, CA 0036-3057

Comment No. 595-1

I am submitting comments and questions about the plan to modernize and develop Television City.

Response to Comment No. 595-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 595-2

I have several questions about the extent of the excavation. The La Brea Tar Pits are very close by.

- Will the excavation release gases into the environment? What gases are going to be released, and what is the city and the developer going to do about that risk? What about the effects to the public, to visitors, and to those who live in the area?
- Did the EIR study how much gas would be released? What were those findings? Where is that located?

Response to Comment No. 595-2

This comment is identical to Comment No. 211-2. Refer to Response to Comment No. 211-2, above.

Comment No. 595-3

I am also really concerned this excavation will have a negative impact on the groundwater and drinking water.

- *Did you study the impact of any excavation on water? What was the result of that study?*

- *Will my property in the Beverly Fairfax neighborhood be impacted by removing groundwater?*
- *Will I be notified if my property is impacted? What will be done to ensure no damage to my property?*
- *How much groundwater will you be removing? Where will it be pumped to?*

Response to Comment No. 595-3

This comment is identical to Comment No. 211-3. Refer to Response to Comment No. 211-3, above.

Comment No. 595-4

I am also wondering why the EIR says that what is being planned for below ground is not part of the floor area? Construction and operations below ground will have impacts.

- *Can you define floor area in the context of this project? Why would basement and below ground areas not be considered floor space? That doesn't make any sense, but does sound as though it allows the developer to not disclose the impacts.*
- *What will the operation and construction impacts be from any buildings, area, and space that the EIR says are not considered part of the square footage?*

Response to Comment No. 595-4

This comment is identical to Comment No. 211-4. Refer to Response to Comment No. 211-4, above.

Comment No. 595-5

I look forward to reviewing your response.

Response to Comment No. 595-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 596

Caroline Witts
537 N. Orlando Ave.
West Hollywood, CA 90048-2530

Comment No. 596-1

I have flipped through the draft environmental report and have a couple of questions and concerns about accessibility and project impacts.

Response to Comment No. 596-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 596-2 through 596-6.

Comment No. 596-2

There doesn't seem to be any consideration or analysis of how all the additional car traffic will impact the local neighborhood school traffic during the school year. The neighborhood is already severely impacted by Fairfax High School traffic. Has anyone on the development team or planning department tried to drive down those adjacent streets at 3pm when schools get out? Or even down the street when work ends at 5pm? Why isn't there any analysis of the additional impacts more cars would have on these streets?

Response to Comment No. 596-2

This comment is similar to Comment No. 421-2. Refer to Response to Comment No. 421-2 for a discussion of the operational effects of Project trips on the streets and intersections near Fairfax High School and in the nearby neighborhoods.

Comment No. 596-3

I know this project will push even more cut through traffic into our neighborhood. Has the planning department done any studies on whether or not this will increase cut through traffic? What days and time of day were those studies done?

Response to Comment No. 596-3

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 596-4

How dangerous will this be to all the pedestrians in our neighborhoods if it does increase cut through traffic?

Response to Comment No. 596-4

Refer to Topical Response No. 12, Safety and Congestion, and Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of —cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 596-5

I also saw that the developer is expect people to use alternative mobility modes like the bus or subway. I live in the area, and everyone I know drives to work. It is also nearly a mile to the future metro purple line that will be the Wilshire/Fairfax stop. If we are expected to change our transportation habits, does the city plan to change or add routes to better accommodate the residents? Not only will this stop not be operational until 2024, I think it is very unrealistic to expect a lot of employees or visitors to use this. The DEIR extremely overestimates the number of people that will use public transportation to visit the site. I also find it unrealistic to think people will take the purple line and then walk nearly a mile to get to work.

Response to Comment No. 596-5

Refer to Topical Response No. 11, Transportation Demand Management, and Response to Comment No. 107-4 for a discussion of the potential effectiveness of transit and TDM.

The Transportation Assessment does not assume that employees or visitors would be willing to walk the approximately 0.8 mile from the Metro D (Purple) Line Wilshire/Fairfax Station currently under construction to the Project Site. Instead, the Project includes a privately funded and operated shuttle bus system to move people between the two points as part of the proposed Mobility Hub that would be located on the Project Site.

Comment No. 596-6

Plus, a lot of audience members are probably going to be tourists, for example people who will attend while visiting Los Angeles. I doubt those visitors would take the subway. Can you please explain how these numbers were reached? Can you also do an alternative study showing the impacts on traffic if people do not use public transportation?

Response to Comment No. 596-6

Refer to Response to Comment No. 596-5 for a discussion of visitor use of transit to the Project Site. The 10-percent assumed non-auto mode split by audience members includes rideshare, taxi, bike, and walk as well as drop-off modes.

The audience travel represents a small percentage of the total trips to/from the Project Site so even if the 10-percent estimate of non-auto trips was hypothetically wrong and no audience member arrived by any mode other than the automobile, the trip generation estimates upon which the Transportation Assessment is based would increase by much less than one percent, and the conclusions of the analysis would not change. Refer to Section B, Visitor Trips, of Topical Response No. 10, Trip Generation.

Comment Letter No. 597

Tim Wong
1211 Graynold Ave.
Glendale, CA 91202-2020

Comment No. 597-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 597-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 598

Mari Worden
7924 W. Fourth St.
Los Angeles, CA 90048-4413

Comment No. 598-1

I am writing this to express my dire concern about the proposed Television City project.

Response to Comment No. 598-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 598-2 through 598-4.

Comment No. 598-2

Our community doesn't not [sic] want this development, and even if it did, our infrastructure cannot handle the amount of traffic that this will produce both during construction and once it opens. The process of constructing this huge project and sheer volume of people who will need to commute to it will have devastating impacts to the Beverly Fairfax area.

Response to Comment No. 598-2

This comment provides a general statement on the traffic conditions in the area and is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 598-3

The city has changed how it measures a project's traffic impacts and has not communicated how or why this change was made. Analysis of traffic impacts is challenging enough for a resident to understand. The EIR says that the average commute will be 3 miles but offers no data to back this claim up. How is that average derived?

Response to Comment No. 598-3

Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment No. 130-2 for a discussion of the change from a LOS analysis of transportation impacts to VMT.

Refer to Section C, Assumptions in the VMT Analysis, of Topical Response No. 8, Vehicle Miles Traveled, and Response to Comment Nos. 9-30, 9-32, 26-156, and 26-E.4-10 regarding the assumptions used in the Project's VMT analysis, including as related to employee trip lengths.

Comment No. 598-4

And when was the analysis done? Because the past two and a half years has been a very different commute situation for many people. But things are going back to a pre-pandemic time as so many people are returning to work on-site. If the traffic analysis is not redone more recently, then it shouldn't be considered valid.

Response to Comment No. 598-4

The trip counts upon which the transportation operational analyses were based were collected in 2019 prior to the pandemic and then factored up to represent 2021 and 2026 conditions. Refer to Topical Response No. 10, Trip Generation, and Response to Comment No. 130-3 for additional discussion of the validity of the transportation analysis.

Comment No. 598-5

This project benefits no one but the developer. A million square feet of television studios with no affordable housing for the people who will build and operate it, what a joke!

This project creates an enormous traffic and environmental footprint with no tangible benefit for locals and I would ask that this project be rejected.

Response to Comment No. 598-5

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 599

Michael Wyatt
319 N. Ogden Dr.
Los Angeles, CA 90036-2133

Comment No. 599-1

I am very concerned about the hundred thousand or more trucks going to go up and down Fairfax to build this project. What is an accurate count of all the trucks needed?? What will be the physical impact to Fairfax from these massive trucks going up and down Fairfax. Can you tell me how many schools, churches, temples, homes and apartments on Fairfax will be impacted? Someone should actually count the numbers of these uses along Fairfax. And isn't Fairfax a single lane in each direction for portions? And you want to bring a hundred thousand or two hundred thousand trucks through this area? Have these people and businesses along this corridor been told what is going to happen to them?? Did you mail notices to these people? And you want to park thousands of trucks over by Loyola High School?? And by the Kaiser Hospital.

Have you notified the High School and the hospital of this?? The noise, air quality, safety issues through this area will be tremendous. Where is the analysis of all this? And why did the developer pick a lower income area to park these trucks in?? Can you provide the demographic information for these communities where the developer wants to park tens of thousands of trucks and polluting these communities?? Were these communities mailed notices of the Draft EIR??

Response to Comment No. 599-1

This comment is identical to Comment No. 183-1. Refer to Response to Comment No. 183-1, above.

Comment Letter No. 600

Sofia Yazpik
441 N. Orange Grove Ave.
Los Angeles, CA 90036-1708

Comment No. 600-1

I'm writing to discuss my concerns about the TVC2050.

Response to Comment No. 600-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 600-2 through 600-7.

Comment No. 600-2

TVC2050 will have huge impacts on our neighborhood, streets, schools, parks, and quality of life. However, the draft environmental impact report said that the project level impacts would be "less than significant" and therefore require no mitigation measures. How was this conclusion reached? The claim that less than significant impacts seems false and misrepresents the reality of the devastating impacts on the community over two decades of construction. How does 20 years of construction lead to "less than significant" impacts? Why do the mitigation measures only apply to when the project is in operation?

Response to Comment No. 600-2

The analysis included throughout the Draft EIR explains in detail how the conclusions were reached.

With respect to transportation, refer to Section IV.K, Transportation, of the Draft EIR. As discussed therein, impacts related to all of the transportation-related CEQA Guidelines Appendix G questions (i.e., potential conflicts with plans, VMT, hazardous geometric design features, and emergency access) would be less than significant without mitigation. The Project has a less-than-significant impact on transportation during operations; therefore, mitigation measures are not warranted. Chapter 5 of the Transportation Assessment (Appendix M.1 of the Draft EIR) details the operational analysis that measures the Project's impacts on the transportation system in the vicinity of the Project Site. Table 18 on page 162 therein summarizes the LOS impacts of adding Project trips to future base conditions. The addition of Project trips does not cause any intersection operating at LOS D

or better to degrade to LOS E or F. The addition of Project trips to the roadway system serving the area causes the average intersection delay to increase by approximately 2.2 seconds per vehicle in the morning peak hour and approximately 2.4 seconds per vehicle in the afternoon peak hour.

The commenter refers to impacts to schools, but provides no specifics. With respect to school capacity, refer to pages 70 and 71 of the Initial Study included as Appendix A of the Draft EIR. As discussed therein, per SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts, and no additional mitigation is required. Impacts to school attendees and employees are accounted for throughout the Draft EIR. The commenter refers to impacts to parks, but provides no specifics. With respect to park facilities, refer to page 71 of the Initial Study included as Appendix A of the Draft EIR. As discussed therein, the Project would not include residential uses and would not generate a new residential population that would regularly utilize nearby parks and recreational facilities and on-site amenities would be provided for employees. Therefore, impacts related to park services would be less than significant, and no mitigation measures would be required. Impacts to park goers are accounted for throughout the Draft EIR.

Please note that quality of life is not a CEQA issue. Nevertheless, this comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

A complete list of mitigation measures included in the Project is provided in Section I, Executive Summary, of the Draft EIR. Refer to pages I-29 through I-36 therein.

Comment No. 600-3

Some of the significant impacts this project will have are traffic, pollution, and crime just to name a few off the top of my head.

Response to Comment No. 600-3

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

It is unclear what type of pollution the commenter is referring to, but if the commenter is referring to air pollution, refer to Section IV.A, Air Quality, of the Draft EIR.

As discussed in Section IV.A of the Draft EIR, the Project would result in significant and unavoidable regional construction emissions, as well as concurrent construction and operation emissions. All other air quality impacts would be less than significant or less than significant with mitigation. Refer also to Response to Comment No. 26-E.1-2 and the quantitative HRA in Appendix FEIR-10 of this Final EIR, which confirms the Draft EIR's conclusion that health risk impacts would be less than significant. Potential impacts related to hazards and hazardous waste are analyzed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As discussed therein, with implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, impacts would be less than significant.

Refer to Section IV.J.2, Public Services—Police Protection, of the Draft EIR for a discussion of public safety. As discussed on pages IV.J.2-13 through IV.J.2-17 therein, impacts associated with police protection would be less than significant. The Project also includes a number of PDFs that would enhance safety on the Project Site, including Project Design Feature POL-PDF-2, which requires a 24/7 security plan.

Comment No. 600-4

This project will have live audiences and add thousands of new employees commuting to work every day. Additionally, there will be thousands of construction trucks coming in and out of the site daily for potentially the next two decades. Why is that not considered a significant impact? On what basis can the applicant claim this?

Response to Comment No. 600-4

CEQA does not require a VMT analysis of construction traffic; CEQA Guidelines Section 15064.3, subdivision (b) notes, “for many projects, a qualitative analysis of construction traffic may be appropriate.” The City does not require an analysis—quantitative or qualitative—of VMT impacts during construction based on the Transportation Assessment Guidelines (LADOT, August 2022). Refer to Topical Response No. 14, Construction Vehicle Impacts, for a detailed discussion of why construction VMT analysis is not required and that Project construction generates substantially fewer trips than Project operation.

Appendix M.1, Transportation Assessment, of the Draft EIR includes a complete Project construction transportation assessment (refer to Section 5D, pages 179 through 184). As discussed therein, while construction-related activities associated with the Project would result in varying levels of truck and worker trips to and from the Project Site on a daily basis, such trips would be far less than operational Project-related trips. Additionally, the Project includes a CTMP prepared pursuant to Project Design Feature TR-PDF-1 (see pages IV.K-36 and IV.K-37 of the Draft EIR), which would include provisions to limit the amount of construction-related trips during peak hours to the extent feasible, as well as a

prohibition of off-site construction worker or equipment parking. The Project construction program does not anticipate any long-term closures of sidewalks or travel lanes along the streets adjacent to the Project Site. Refer to Topical Response No. 14, Construction Vehicle Impacts, for additional information about the trips generated by construction.

Comment No. 600-5

These trucks will also be releasing diesel particles, greenhouse gases and other pollution. Has there been a health study on these impacts? How much pollution would thousands of trucks add over the span of building this project? Why aren't these impacts considered significant?

Response to Comment No. 600-5

Please refer to Response to Comment Nos. 26-E.1-2, 123-3, and 127-4 for a detailed response regarding diesel trucks and related emissions and health impacts.

Comment No. 600-6

Where is the analysis on the additional impacts of more cars on our major streets around the project site? The streets in our neighborhood are already crazy busy during the school year. Have you tried driving down these streets at 7AM or 3PM when kids are going to and from school? Will the project push more traffic into our neighborhoods along cut through streets? Why isn't traffic in our neighborhood considered a significant impact?

Response to Comment No. 600-6

Refer to Response to Comment No. 421-2 for a discussion of the operational effects of Project trips on the streets and intersections near Fairfax High School and in the nearby neighborhoods.

Refer to Topical Response No. 9, Neighborhood Traffic Management Plan, regarding the non-CEQA analysis of cut-through trips in the Transportation Assessment (Appendix M.1 of the Draft EIR).

Comment No. 600-7

Why aren't the many adverse impacts expected important to the city when approving the project? Is the city saying that residents will have to just live with the impacts because the project is more important than the neighborhood?

Please answer these questions before moving forward with this project.

Response to Comment No. 600-7

Pursuant to Section 15093(a) of the CEQA Guidelines, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.” The commenter should note that the Project has not been approved by the City. Following publication of the Final EIR, the Project will be subject to public hearings, including hearings before the City Planning Commission and the City Council.

This comment is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 601

Bilal Young
1758 N. Orange Dr.
Los Angeles, CA 90028-4374

Comment No. 601-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 601-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.

Comment Letter No. 602

David Young
441 1/2 N. Ogden Dr.
Los Angeles, CA 90036-1748

Comment No. 602-1

Please address my concerns with the proposed Television City construction project. As a local, I want to know what is potentially going to be built and how it will change my neighborhood.

Response to Comment No. 602-1

This comment is identical to Comment No. 214-1, but is nevertheless noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 602-2 through 602-6.

Comment No. 602-2

The site is right in the middle of a neighborhood with schools, religious organizations, museums and Pan Pacific Park. How will the increased car and truck traffic for construction and then the increased traffic for employees in the enlarged Television City impact the health of residents? of the school children? and of visitors to the park? How will increased exhaust from diesel trucks negatively affect these people, particularly people at risk? What is the analysis of the impacts to the most at-risk populations such as children, people with asthma, seniors, and what were the conclusions? How many different at-risk groups live in this area? And how close are they to the project site?

Response to Comment No. 602-2

This comment is identical to Comment No. 127-4. Refer to Response to Comment No. 127-4, above.

Comment No. 602-3

Another impact that needs to be further explained in the EIR is noise from all those trucks and from the construction itself. During construction, how much increased sound will occur? and what will be the impacts of the different sources of noise to the residents 'and others 'hearing? If construction takes two decades or more, how much does that increase

the impact on people's hearing? How much does it impact quality of life? Construction noise is annoying at best and harmful at worst.

Response to Comment No. 602-3

This comment is identical to Comment No. 127-5. Refer to Response to Comment No. 127-5, above.

Comment No. 602-4

The Adobe and Farmers Market are true community landmarks and important to the community. How will the expansion of Television City affect the Adobe? During construction, it seems they would be impacted by construction noise, dust, and debris, so what will those impacts be? How much blasting, drilling, and other construction activity will there be to impact it? Won't visitor to the Farmers Market be impacted by the noise, traffic and daily construction? What steps are being taken to ensure the increased traffic and people coming into the area does not displace regular customers and visitors?

Response to Comment No. 602-4

This comment is identical to Comment No. 214-4. Refer to Response to Comment No. 214-4, above.

Comment No. 602-5

I understand there will be power generators at the basecamps. Since generators often run on diesel fuel, how will the pollution, both air and noise, be handled? How often will the generators be used? What will they be used for? What about safety and hazard concerns?

Response to Comment No. 602-5

This comment is identical to Comment No. 214-5. Refer to Response to Comment No. 214-5, above.

Comment No. 602-6

It seems irresponsible given the housing crisis that this huge expansion would not include residential development. Why did the developer choose not to include housing? Why isn't he required to include any housing, especially affordable housing? Is there a possibility to add it to the plan for development? Doesn't the city have a responsibility to offer more housing to workers given the need?

Response to Comment No. 602-6

This comment is identical to Comment No. 127-6. Refer to Response to Comment No. 127-6, above.

Comment Letter No. 603

Shirley Zadaca
454 N. Kilkea Dr.
Los Angeles, CA 90048-2229

Comment No. 603-1

I am writing with concerns about the proposed TVC project and its application process. As a long term resident I have seen a lot of building in my area.

Response to Comment No. 603-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 603-2 through 603-6.

Comment No. 603-2

During the Planning review process, did they detail how the proposed plan differed from the current code? Was the draft plan shared with the public? If so, when was it shared and with whom? What is required for this kind of a permit? It seems those of us in the community are just hearing about the project for the first time.

During the Planning review process, did they detail how the proposed plan differed from the current code? Was the draft plan shared with the public? If so, when was it shared and with whom? It seems those of us in the community are just hearing about the project for the first time.

Response to Comment No. 603-2

Refer to Response to Comment No. 26-22 regarding the relationship of the Specific Plan to the LAMC and the Draft EIR's CEQA analysis of the Project's consistency with the LAMC.

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment Nos. 5-3 and 26-6 with regard to the Project Description and proposed Specific Plan, the purpose and function of a specific plan, how the Draft EIR disclosed and analyzed all physical elements of the Project in accordance with CEQA, and the regulatory process under the proposed Specific Plan. As discussed therein, neither CEQA nor City policy requires a proposed specific plan to be included in the EIR.

Nevertheless, in response to comments on the Draft EIR, the Preliminary Draft Specific Plan has been made publicly available prior to the publication of this Final EIR, which can be accessed on the Department of City Planning's website. Further, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Refer to Response to Comment No. 604-5 regarding the entitlement process. Also refer to Response to Comment Nos. 28-13 and 32-3 regarding noticing and community outreach. As discussed therein, in addition to complying with and exceeding CEQA's noticing requirements, the Applicant has actively engaged with the community and shared information about the Project for several years. Following the publication of this Final EIR, the Project approvals and EIR will be considered during several public hearings and meetings before City decision-makers prior to any approval, and the public will have additional opportunities to comment on the Project at such hearings and meetings.

Comment No. 603-3

When will a public hearing be held for the project? Don't you have to have one as part of this comment period?

Response to Comment No. 603-3

Following the publication of this Final EIR, the Project approvals and EIR will be considered during public hearings before City decision-makers prior to any decision being made on the Project. The public will have additional opportunities to comment on the Project at upcoming hearings. Noticing for hearings will be sent in accordance with state law. Notices will be sent to everyone who commented on the Draft EIR.

Comment No. 603-4

There are no specifics in the plan. We have no idea what they might build on this property. How will we be able to know if what is being built falls within the appropriate codes of what is allowed? I am not sure we need another 2 million square feet of building in this neighborhood.

Response to Comment No. 603-4

Refer to Response to Comment No. 603-2 regarding the Project Description and Specific Plan.

The comment is incorrect that the Project would add 2 million square feet of development. As discussed on Draft EIR page II-1 in Section II, Project Description, the

proposed Specific Plan would permit up to 1,626,180 square feet of new development (1,130,320 net new square feet).

Comment No. 603-5

This needs to be detailed and recirculated according to the necessary regulations. I am very concerned about traffic and parking on site!

Response to Comment No. 603-5

Under SB 743, the transportation impact analysis shifted from vehicular delay (i.e., LOS) to VMT. Thus, congestion and driver delay are not CEQA impacts. Refer to Section B, Level of Service, of Topical Response No. 12, Safety and Congestion, and Response to Comment Nos. 9-29 and 16-36 regarding the non-CEQA LOS analysis in the Transportation Assessment.

Under SB 743, the adequacy of a new development's parking supply is not a CEQA consideration. Refer to Topical Response No. 13, Parking, regarding the adequacy of the on-site parking supply to accommodate the peak parking demands of the Project and prevent spillover parking. As discussed therein, off-site parking is no longer proposed; refer to Section III, Revisions, Clarifications, and Corrections to the Draft EIR.

This comment does not provide substantial evidence that "significant new information" as defined by CEQA Guidelines Section 15088.5 has been added to the Draft EIR. Thus, recirculation of the Draft EIR is not required. Also refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 603-6

I look forward to how your department will address these questions.

Response to Comment No. 603-6

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 603-2 through 603-5.

Comment Letter No. 604

Tamar Zadaca
454 N. Kilkea Dr.
Los Angeles, CA 90048-2229

Comment No. 604-1

I am writing with concerns about the proposed TVC project and its application process. As a long term resident I have seen a lot of building in my area.

Did this application follow the appropriate process with the Planning department for this kind of a project? What is that process, so that those of us who don't know it well? What is required for this kind of a permit?

What other permits, like from other agencies, will the development need to get? Doesn't the developer needs to get some kind of water, hazardous, fire prevention, waste management, and other approvals? Please provide details about these other permits. In what order and when does the developer have to get them?

Response to Comment No. 604-1

Refer to Response to Comment No. 604-5 regarding the application process.

Pages II-35 and II-36 in Section II, Project Description, of the Draft EIR list the anticipated discretionary entitlements, reviews, permits, and approvals required to implement the Project.

Comment No. 604-2

During the Planning review process, did they detail how the proposed plan differed from the current code? Was the draft plan shared with the public? If so, when was it shared and with whom? It seems those of us in the community are just hearing about the project for the first time.

Response to Comment No. 604-2

The Project's impacts related to land use were analyzed in Section IV.H, Land Use and Planning, of the Draft EIR. In accordance with CEQA, the Draft EIR analyzed the Project's potential to conflict with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and determined that impacts would be less than significant.

Refer to Response to Comment No. 32-3 regarding the extended 60-day public comment period for the Draft EIR, which provided the public sufficient opportunity to comment on the Project.

Comment No. 604-3

When will a public hearing be held for the project? Don't you have to have one as part of this comment period?

Response to Comment No. 604-3

This comment is identical to Comment No. 603-3. Refer to Response to Comment No. 603-3, above.

Comment No. 604-4

There are no specifics in the plan. We have no idea what they might build on this property. How will we be able to know if what is being built falls within the appropriate codes of what is allowed?

Response to Comment No. 604-4

This comment is identical to a portion of Comment No. 603-4. Refer to Response to Comment No. 603-4, above.

Comment No. 604-5

What guardrails exist to keep track of the plans?

Response to Comment No. 604-5

In the City of Los Angeles, the submitted entitlement request is governed by Sections 11.5.6, 11.5.7, 12.32, 13.11, and 17.15 of the LAMC in addition to approval from the City of Los Angeles on a Development Agreement authorized under California Government Code Sections 65864 and 65869.5 as well as subsequent future approvals from the Local Agency Formation Commission (LAFCO).

The proposed Specific Plan, Sign District, and VTTM applications were filed with the City of Los Angeles Planning Department and requires an initial decision-maker to review and deem said application as complete. The initial decision maker for this case will be the Deputy Advisory Agency for the VTTM and the City Planning Commission for the proposed Specific Plan, proposed Sign District, and proposed Development Agreement. The City

Planning Commission's recommendation would then be considered by the City Council and the Mayor.

The entitlements filed require a public hearing and notice. They require that the Project Site be posted with a notice of any public hearing (at a date prescribed), and the application requires that findings be made to support the decision-maker's determination. Whether the application is approved or denied, the Letters of Determination issued on any portion of the Case may be appealed for persons aggrieved by the initial decision.

Television City has undertaken an entitlement process that includes full CEQA EIR review and clearance, as well as for multiple opportunities for an interested party to engage and be included in city discussions on the Project, all leading to a recommendation by the City Planning Commission that the City Council and Mayor can approve (in whole or in part and with or without conditions) or deny. This recommendation will incorporate "guardrails" in the form of an approved Specific Plan that would rule and regulate the size, height, and design of what can be constructed on-site, as well as processes and procedures for which elements can be built with an administrative and/or discretionary review. Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, regarding the regulatory process under the proposed Specific Plan.

Comment No. 604-6

This needs to be detailed and recirculated according to the necessary regulations.

Response to Comment No. 604-6

Refer to Response to Comment Nos. 604-2 through 604-5. As demonstrated therein, the Draft EIR has been completed in full compliance with CEQA and recirculation is not required. Refer to Response to Comment No. 9-4 regarding recirculation.

Comment No. 604-7

I look forward to how your department will address these questions

Response to Comment No. 604-7

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 604-2 through 604-6.

Comment Letter No. 605

Daniel Zeanel
327 N. Formosa Ave.
Los Angeles, CA 90036-2526

Comment No. 605-1

I live within the Beverly Fairfax Historic District for over 36 years.

Response to Comment No. 605-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 605-2

The fact that the project's EIR concludes there won't be any effects on our historic district worries me a lot.

Response to Comment No. 605-2

Refer to Section E, Impacts to Historical Resources in the Vicinity of the Project Site, of Topical Response No. 5, Historical Resources, regarding how the Project, including Project trips, would not significantly impact any historic district. The comment is noted for the administrative record and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 605-3

The Project's construction years are discussed in the EIR, but not with any clarity. Is construction going to be for three years? What does it mean that construction could be up to 20 years? Does that mean construction could be going on for 20 years in our community? We are a community of pedestrians, and children and families frequently stroll around our neighborhoods to visit one another's homes and attend religious services. Does the city expect that our lives could be affected by noise, more traffic, trucks all week long, closures, more cars driving through our neighborhood—for up to 20 years?

Response to Comment No. 605-3

This comment is identical to Comment No. 257-2. Refer to Response to Comment No. 257-2, above.

Comment No. 605-4

In addition, it will ruin our way of life and interfere with the very cultural Importance that has made Beverly Fairfax a historic area. Did you evaluate the effect all the construction activities will have on visitors to the historic area boundaries? Where Is that analysis? Can you point to findings that construction trucks and employees are not going to be driving through our communities at all hours of the day and night? When and how will construction trucks will be routed? Will trucks being using an entrance that runs along Fairfax, pulling out into traffic to get to the freeway?

Response to Comment No. 605-4

This comment is identical to Comment No. 257-3. Refer to Response to Comment No. 257-3, above.

Comment Letter No. 606

Patricia Zehentmayr
6650 W. Fifth St.
Los Angeles, CA 90048-4602

Comment No. 606-1

Being a resident of this neighborhood for 30 years, I feel like I have a big stake in this project. None of it sounds good to me.

Response to Comment No. 606-1

This introductory comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 606-2

First of all, it reminds me of The Millennium project in Hollywood, where there was no real definition—we have no idea what this project is. All we know is that construction is going to take place for the next 20 years, but don't know what it's going to look like, the phases of construction, the traffic impacts, the noise and disruption, impacts and so on and so on.

Please explain why you put out an EIR that went against what the court said in that case the City cannot do.

Response to Comment No. 606-2

Refer to Topical Response No. 1, Clearly Defined Project Description and Specific Plan, and Response to Comment No. 9-13. As discussed therein, the *Millennium* case is not applicable to the Project, and the Project Description is distinguishable from the project description at issue in *Millennium*.

With regard to the Project Description, refer to Topical Response No. 1 and Response to Comment No. 5-3. As discussed in these responses, the Project Description contained in the Draft EIR is accurate, stable, and finite and contains all necessary data to evaluate and determine the environmental impacts of the Project.

Refer to Response to Comment No. 9-24 with regard to the Project timeline. Also refer to Topical Response No. 14, Construction Vehicle Impacts.

Refer to Sections IV.I, Noise, and IV.K, Transportation, of the Draft EIR, which include a comprehensive analysis of the Project's potential noise and transportation impacts.

Comment No. 606-3

It seems unbelievable that the draft EIR was approved without the community being able to express our opinions.

Response to Comment No. 606-3

The Project has not been approved by the City. Following publication of the Final EIR, the Project will be subject to public hearings, including hearings before the City Planning Commission and the City Council. Refer to Response to Comment No. 32-3.

Comment Letter No. 607

Michael Zimmerfeld
163 N. Poinsettia Pl.
Los Angeles, CA 90036

Comment No. 607-1

I recently heard that the TVC 2050 Plan includes a provision that would potentially change our Community Plan to that of a Regional Center. I must admit, I have some reservations about the idea. I certainly have many questions about it.

For one, have you analyzed the impacts that would come from future development under this jurisdiction? Transforming our Community Plan practically guarantees there will be more development here and that it will be harder for us to discern which projects truly benefit our community. I understand that there are impact reports for the TVC plan, but do they extend to the expected development that will come as a result of this plan change? How is a change to a Regional Center implemented? Why is it not being done as part of updating our Community Plan? Do we have an estimate on how much more development there will be in the area as a result of this change? When would that happen? How might this affect residents, due to added development bringing added traffic and added pollution? Or how traffic might continue to increase from additional development beyond the calculations specific to the TVC development?

Response to Comment No. 607-1

Refer to Response to Comment Nos. 5-8, 11-29, and 16-4 with regard to the proposed Regional Commercial designation. The proposed General Plan Amendment to Regional Commercial applies only to the Project Site and would not allow for additional development on other sites within the City. Any development proposed for another site would be required to go through the City review process, including potential CEQA review, as applicable. Refer to Topical Response No. 6, Wilshire Community Plan Update, with regard to the Wilshire Community Plan update.

Comment No. 607-2

Speaking of residents, have you received sufficient community input for a change to the Community Plan? These Plans are crafted through an established process to help ensure everyone gets a chance to make their voice heard. I have heard little about the fact that the TVC Plan will change our Community Plan. As a matter of fact, I've barely heard about community input periods for the TVC Plan in general. So I need to ask, how many people have attended these meetings? How many public input sessions have there been thus far?

Were people given sufficient notice? How many people did you contact in your outreach efforts? Did you send personal messages to anyone close to the development, and if so, how close to the development did they need to be for you to send the message? I suspect there are others who, like me, were unaware of this Regional Center aspect being tied to TVC, so I want to make sure people have a chance to make their voices heard.

Response to Comment No. 607-2

Refer to Response to Comment Nos. 28-13 and 32-3 for a discussion of public outreach conducted thus far for the Project, public noticing, and future public hearings prior to Project approval.

Comment No. 607-3

One last concern I have about this change to a Regional Center is how this might affect the property values of people living here and homeowners. I suspect becoming a Regional Center will increase property values in today's real estate market. What does your analysis say about that? While property owners would favor that, I know there are many renters who be forced to move out if rents were to rise. So have you analyzed how much Regional Center renters have to pay in rent versus their counterparts? How do you expect property values to change as a result? Do you have specific protections in place for long-term residents here? Once again, have you made those who might be affected aware of what is to happen?

Response to Comment No. 607-3

Refer to Response to Comment No. 5-8 regarding the proposed Regional Commercial designation.

Under CEQA, "an economic or social change by itself shall not be considered a significant effect on the environment" (14 CCR 15131). Substantial evidence must be provided to demonstrate a reasonably foreseeable physical impact on the environment from the economic or social change. The commenter has provided no such evidence. Nevertheless, the comment is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 607-4

Thank you for your time. I think these questions are an important part of the process, and I would like to know you have answers that will satisfy the whole community before you make changes to the plan we approved

Response to Comment No. 607-4

This comment, which concludes the letter, is noted for the administrative record and has been incorporated into this Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. 607-2 and 607-3.

Comment Letter No. 608

Louis Zogaib
8747 Clifton Way, Apt. 303
Beverly Hills, CA 90211-2125

Comment No. 608-1

I strongly support TVC 2050: The Los Angeles Studio Plan. TVC 2050 is a significant investment in our City's most identifiable industry, creating thousands of good-paying jobs and ensuring that Los Angeles remains the entertainment capital of the world.

TVC 2050 will enhance and modernize the studio's production operations, allowing the facility to meet the constantly changing demands of the entertainment industry and promoting long-term operational sustainability. TVC 2050 includes the development of much-needed sound stages and new production facilities, keeping production and production jobs in Los Angeles.

TVC 2050 is a thoughtfully designed plan that preserves the existing studio use and rehabilitates the studio's Historic Cultural Monument. TVC 2050 encourages multi-modal transportation options through an on-site Mobility Hub, beautifies the public realm, and improves pedestrian safety and connectivity to the surrounding neighborhood. Importantly, the City's Draft Environmental Impact Report identifies no significant impacts from studio operations.

Please move TVC 2050 forward for approval. It will provide long-term benefits to the Beverly/Fairfax District, the City, and the region. The plan creates thousands of production jobs, prioritizes sustainability, and promotes diversity, equity, and inclusion through its Changing Lenses initiative, ensuring this iconic studio and the important industry and Angelenos it supports will continue to thrive.

Response to Comment No. 608-1

This comment is identical to Comment No. 50-1. Refer to Response to Comment No. 50-1, above.