

To: Kathleen King
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Environmental Case No.: ENV-2023-1348-EIR
State Clearing House No.: 2023060056
Project Name: Radford Studio Center Project

Dear Ms. King,

Based on a review and analysis of the DEIR and the comments received from the stakeholders of Studio City, the Board of the Studio City Neighborhood Council (SCNC) in its response below is conveying the concerns raised about the impact that the Project will have on our community and the sufficiency of the DEIR study and analysis.

The SCNC would like to see the Radford Studio Center's continued use as a media studio production facility as it has been used for the last 100 years.. However, there are significant concerns about several elements of the project as proposed that require further discussion with the developer and the various electeds overseeing the process. We intend to continue the discussions we have conducted over the past several months. Below is a list of the issues of concern that still need to be resolved:

- **Sign District** – Radford Studio Center (Studio) is surrounded by residential neighborhoods that have developed around the facility over the last 100 years. This places the Studio in a unique situation in that it is not in an urban/industrial core. Other studios do not have billboards adjacent to residential zones. FOX Studios is on Pico Boulevard, a major 4 lane highway; Universal Studios, Warner Brothers Studios and Disney Studios do not have billboards directly adjacent to residential neighborhoods. The Studio is also directly adjacent to the Los Angeles River Improvement Overlay (RIO) walking and bike paths which does not have billboard advertising. SCNC will present Radford Studios with an alternative advertising scheme and proposal for aesthetic treatments for walls facing residential areas.
- **Height & Mass of Office Buildings** – The southern section of the Studio property is currently zoned [Q]M2-1-RIO. This [Q] Condition limits the height to 70 feet. The SCNC agrees to the outer perimeter height of 75 feet and the innermost section of this southern section of the property as 95 feet. We do not agree to these 75/95 foot heights with an “asterisk” of up to 95/135 foot heights. The Studio is completely surrounded to the north, south, east and west by residential neighborhoods. The very narrow Ventura Boulevard Corridor's Specific Plan puts the businesses on Ventura Boulevard between Radford Avenue and Colfax Avenue in the following category of the Ventura-Cahuenga Corridor Specific Plan:

*COMMUNITY COMMERCIAL PLAN DESIGNATION: A land use designation in the Community Plan **which is a focal point for surrounding residential neighborhoods** and containing a diversity of uses, such as small offices and overnight accommodations, cultural facilities, schools and libraries, in addition to neighborhood oriented services.*

- **Ventura Boulevard Alley** (between Radford Avenue and Colfax Avenue) – This traffic congested alley cannot have trash pick-up or deliveries from the Studio through any portals along the alley, except from the proposed new Carpenter Avenue Gate. Currently all trash pick-up or deliveries are done internally on the Studio property. This Alley must be repaved in concrete to prevent constant asphalt potholes. Light colored concrete will also reduce the heat island effect.
- **Buried Utilities** – The SCNC requests that all utilities be buried on the Ventura Boulevard Alley between Radford Avenue and Colfax Avenue, as well as, on Radford Avenue between the Ventura Boulevard Alley and the Tujunga Wash.
- **Environmental issues**
 - Problems
 - Construction impacts
 - Incremental traffic
 - Continued off gassing of the new built environment
 - Heat island effect
 - Impermeable surfaces
 - Mitigation
 - *Radford Traffic Demand Management (TDM) increased from Radford proposal of fifteen per cent to thirty per cent.*
 - Studio City TDM
 - Neighborhood Traffic Management Plan (**NTMP**)
 - Carpenter Mobility hub
 - Various enhancements to the Development Agreement
- **Traffic-** The DOT assessment asserts there is “no impact” but that is based on a *Vehicle Miles Traveled (VMT)* evaluation which bears no relation to the lived experience of Studio City stakeholders. Current service level experiences are unacceptable and this project must be integrated into a program regionally that improves the situation, not one that accepts gridlock, excessive commute times and concern about emergency response times. This is not the only project underway or

under consideration in Studio City. We do not intend to place the burden of regional problems on this one development but choose to use this analysis as a catalyst to develop regional responses to the inevitable growth the region will see.

- Service level problems
 - Three Phases
 - Now/Existing
 - With construction
 - During operation
 - Nature of service level problems
 - Excessive commute times
 - Public safety issues
 - Emergency vehicle response time
 - Evacuation routes and efficiency
 - Emissions issues
 - Mitigation Strategies
 - Radford TDM
 - Studio City TDM
 - NTMP

The Traffic Study, Appendix O states: Transportation concluded that the implementation of the project would **not** result in a significant transportation impact. It is reasonable to conclude that a project of this magnitude which intends to modernize the Studios **will** result in a significant transportation impact.

- **Problems with Traffic Study** - We request your assistance in ordering LADOT to conduct a more comprehensive traffic study. The initial study was flawed and failed to capture an accurate depiction of traffic behavior in the neighborhoods.

The study collected counts on March 7, 8, 9, 2023 and November 14 and 16, 2023 during the morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak periods and is flawed for the following reasons:

March 7, 2023: Study date is a Tuesday and Carpenter Ave. School and Colfax Elementary School dismisses students at 1:30 PM and Walter Reed Middle School dismissal is at 2:08 PM.

March 8, 2023: Study date is a Wednesday and Campbell Hall School has a late start of 9:30 AM.

November 14, 2023: Study date is a Tuesday and school dismissal times are as follows: Carpenter Ave. School and Colfax Elementary School dismisses students at 1:30 PM and Walter Reed Middle School dismissal is at 2:08 PM.

The afternoon traffic measurement session began at 3:00 PM but on two of the four dates failed to consider the early 1:30 PM dismissal of LAUSD students.

None of the counts included the streets in the neighboring areas (Landale Square; The Grove; Colfax Meadows or South of Ventura at Carpenter). These are the very areas currently affected by traffic and will be subject to future impacts the project will impose.

- **Level of Service Concerns** - It was determined that the levels of service (LOS) at signalized and unsignalized intersections based on the delay experienced per vehicle adequately disclosed operation concerns. (Page 6)

What does “adequately” mean? Could more have been done? One can and should conclude that more should be done.

- **Ingress/Egress Issues** - The analysis determined that the anticipated queues entering the project driveways would not extend into the public right of way and would not substantially affect through traffic along adjacent corridors. All security gates would be located to provide adequate queueing areas that would meet City requirements and project demand and would minimize the potential for vehicle queueing into the public streets. (Page 7)

How was this determined? How do you know this to be a true statement?

The current Transportation study identified potential alternative routes that could be used as a cut-through route to avoid arterial congestion (Page 10) but this analysis was not included part of the Draft E.I.R.

Overall Conclusion:

SCNC appreciates the efforts made by Radford to engage all stakeholders impacted by the project. Much progress has been made but more remains to be done, particularly in regards to traffic mitigation as current service level experience is unacceptable. We look forward to crafting a plan where the project can improve the situation in the community.

We appreciate your consideration of our community's concerns about the project.

Sincerely yours,

Chip Meehan
President, Studio City Neighborhood Council

APPENDIX -