



Radford Studio Center Environmental Impact Report Overview

SCNC AD HOC MEETING

February 12, 2025

Eyestone Environmental – City EIR Consultant

Draft EIR—AESTHETICS (Thresholds & Methodology)

Pursuant to SB 743, because the Project is an employment center within 0.5 miles of a major transit stop, its aesthetic impacts are less than significant as a matter of law. The analysis in the Draft EIR was provided for informational purposes only.

Significance Thresholds:

Would the Project:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Draft EIR Methodology:

- The assessment of impacts on a scenic vista focuses on the anticipated changes to existing scenic vistas available from the representative public locations in the vicinity of the Project Site.
- Because the Project Site is located in an urbanized area, the analysis of visual character focuses on whether the Project would conflict with zoning and other regulations governing scenic quality.
- The analysis of light and glare is based on the Lighting Report, prepared by a lighting consultant using regulations and standards from the LAMC and state codes. Light and glare from the Project were evaluated at adjacent sensitive uses and for drivers on adjacent streets.

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR—AESTHETICS (Project Design Features)

Project Design Features (PDF) incorporated as part of the Project:

- **AES-PDF-1:** Temporary 10-foot-tall, opaque construction fencing will be installed around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash. Any graffiti that may appear on this construction fencing will be removed on a regular basis.
- **AES-PDF-2:** Outdoor lighting will be directed away from adjacent residential properties and the public right-of-way. However, construction lighting will not be so limited as to compromise the safety of construction workers.
- **AES-PDF-3:** All landscaped areas will be maintained in accordance with an approved landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.
- **AES-PDF-4:** Stationary light sources will be designed to produce no more than 0.74 fc of illumination as measured at the Project Site property line or at the centerline of the adjacent public right-of-way.
- **AES-PDF-5:** All exterior stationary lights located within 50 feet of the Project Site boundary will not exceed 30 feet in height, will be fully shielded, and have a Backlight, Uplight, and Glare (BUG) rating of B=0 U=0 G=0 to reduce glare, uplight, and backlight onto the adjacent residential properties.
- **AES-PDF-6:** All exterior stationary lights located within 50 feet of the Project Site boundary will have a type II distribution.
- **AES-PDF-7:** Parking structure rooftop lighting will not exceed 20 feet in mounting height and will use horizontally mounted, rectilinear-type, sharp cut-off fixtures shielded in such a manner that the source cannot be viewed from residentially zoned properties outside of the Project Site. The source will not exceed 9,500 lumens and will be located no less than 40 feet from the building perimeter and/or below the height of the roof parapet.
- **AES-PDF-8:** All exterior building and stationary site lighting will not exceed 2,500 lumens within 50 feet of the Project Site boundary. All exterior building and site lighting located beyond 50 feet of the Project Site boundary will not exceed 20,000 lumens.
- **AES-PDF-9:** Project signs located within 100 feet from Project property line and/or Project boundary will not exceed the nighttime luminance of 100 candelas per meter squared (cd/m²) at night from sunset until sunrise. Exterior Project signs will be illuminated by fully shielded light fixtures mounted at the top and bottom of the signs. Digital displays will not be permitted on the Project exterior (i.e., digital displays will only be permitted in the Site Interior).

Draft EIR—AESTHETICS (Project Design Features and Findings)

Project Design Features Incorporated as part of Project:

- **AES-PDF-10:** Project signs located beyond 100 feet from the Project property line for the western and southern portion of the Project Site and the Project boundary for the eastern portion of the Project Site will not exceed the nighttime luminance of 300 cd/m² at night from sunset until sunrise. No interior digital Project signs will be allowed within 100 feet from the Project property line to the west and south and 100 feet from the Project boundary to the east and north.
- **AES-PDF-11:** Mural walls will be illuminated with fully shielded floodlights located at the top of the walls shining down. Mural/art walls surface brightness will not exceed 50 cd/m².
- **AES-PDF-12:** Project signs will not exceed the daytime luminance of 6,000 cd/m² for all signs during the day, from 45 minutes after sunrise until 45 minutes prior to sunset.
- **AES-PDF-13:** Project signs luminance will transition smoothly from daytime luminance to nighttime luminance and vice versa over a period of no less than 45 minutes.

Findings:

ALL AESTHETIC IMPACTS ARE LESS THAN SIGNIFICANT PER SB 743

Conclusion of informational analyses:

- Scenic vistas, including views from Mulholland Drive – **Less than significant**
- Views from a scenic highway – **Less than significant**
- Conflict with Applicable Regulations Governing Scenic Quality – **Less than significant**
- Light and Glare – **Less than significant**

Draft EIR—AIR QUALITY (Guidelines & Methodology)

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Would the Project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- c) Expose sensitive receptors to substantial pollutant concentrations?
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

- Air quality analysis was performed in accordance with SCAQMD's Guidance (e.g., SCAQMD's CEQA Air Quality Handbook and supplemental materials).
- Emission inventory was calculated using CalEEMod
- Regional air quality emissions associated with construction and operation of the Project, and overlap of construction and operation of the Project were calculated. The emissions evaluated included area, energy, mobile, and stationary sources.
- Localized impacts were evaluated using SCAQMD LST look-up tables (5-acre activity construction area and 25-meter distance). This analysis focused on nearby sensitive receptors.
- TAC impacts were evaluated by conducting a qualitative analysis consistent with CARB's Air Quality and Land Use Handbook.

Draft EIR—AIR QUALITY (Mitigation Measures and Project Design Features)

Mitigation Measures & Project Design Features:

[Note this is a summary – refer to Section IV.B, of Draft EIR for full text]

- **AIR-MM-1:** Project shall make available to LADBS and SCAQMD a comprehensive inventory of all offroad construction equipment, equal to or greater than 50 horsepower, that shall be used during any portion of construction. This equipment shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards, and where commercially reasonable for the Project Site, construction equipment shall meet Tier 5 requirements.
- **AIR-MM-2:** During excavation activities for the South Lot, CARB verified soil stabilizers shall be used on unpaved haul roads. Unpaved haul roads shall also be covered with gravel with a maximum of five percent silt content. The on-site speed limit for construction employee vehicles and delivery and haul trucks shall be limited to 15 mph on paved surfaces, 10 mph on unpaved surfaces controlled by soil stabilizers, and 5 mph near active work zones to position for loading/unloading.
- **AIR-MM-3:** Construction haul truck staging areas shall be located on-site, as shown in Appendix D of the Draft EIR. In addition, where commercially reasonable for the Project Site, the Project's truck operator(s)/construction contractor(s) shall use 2014 model year or newer heavy-duty trucks meeting CARB's 2013 optional low-NOX standard.
- **AIR-MM-4:** All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- **PDF (from GHG-PDF-1):** The Project includes Project Design Feature GHG-PDF-1, prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment.

Findings

- Analysis evaluated impacts during construction and operation and also accounted for impacts associated with overlap of construction activities with operation of the Project Site.
- The construction analysis included a worst-case analysis wherein the Project would be built at once and built out by 2028 with overlapping phases
- Consistency with air quality plans – **Less Than Significant**
- Regional emissions during construction, and during overlap of construction and operation— **Significant and Unavoidable** – threshold is exceeded and is common for Projects of similar size
- Regional emissions during operation – **Less Than Significant**
- Localized emissions during construction – **Less Than Significant with Mitigation** (Tier IV equipment and use of soil stabilizers for unpaved areas)

- Localized emissions during operation – **Less Than Significant**
- CO Hotspots – **Less Than Significant**
- Toxic Air Contaminants – **Less Than Significant**

There are no long-term air quality impacts associated with operation of the Project.

Draft EIR—BIOLOGICAL RESOURCES (Significance Thresholds & Methodology)

Significance Thresholds:

Would the Project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

The analysis was prepared by experienced biologists who conducted detailed surveys and research.

This analysis identifies the potential “direct” and “indirect” impacts of the Project on biological resources.

Direct impacts are those that involve the initial loss of habitat or individuals due to vegetation clearing and construction-related activities.

Indirect impacts would be those related to impacts on the adjacent remaining habitat off-site due to construction activities (e.g., noise, dust) or operation of the Project (e.g., human activity).

Draft EIR—BIOLOGICAL RESOURCES (Project Design Features, Mitigation Measures and Findings)

Mitigation Measures & Project Design Features implemented as part of the Project:

- **BIO-MM-1:** Qualified Biologist onsite prior and during demolition to ensure bat roost avoidance and impact minimization.
- **BIO-MM-2:** Certified Arborist onsite prior and during construction activities to implement tree protection Best Management Practices.
- **BIO-PDF-1:** A qualified biologist will be retained to review the landscaping plan prior to submittal of the plan to the City to ensure that any landscaping component of the Project does not include the planting of exotic, invasive species that would potentially degrade the quality of the regional natural open space.
- **BIO-PDF-2:** A Qualified Biologist will be retained to determine an appropriate avoidance buffer for any identified migratory bird, which will be no less than is necessary to protect the nest, eggs and/or fledglings, from damage or disturbance.

Findings:

- **Less Than Significant Impacts:**
 - Impacts to state or federally protected wetlands and jurisdictional features (LA River and Tujunga Wash)
 - Impacts to wildlife species and wildlife corridors
 - Impacts to migratory fish species
 - Impacts to riparian habitat or other sensitive natural community
 - Impacts associated with a habitat conservation plan or a natural community conservation plan
- **Less Than Significant Impacts with Mitigation**
 - Impacts to special status wildlife species (the big free-tailed bat and western mastiff bat)
 - Impacts associated with tree protection

Draft EIR—CULTURAL RESOURCES (Significance Thresholds & Methodology)

Significance Thresholds:

Would the Project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

- Analyses were based on detailed studies from experts in historical and archaeological resources.
- For historic resources, evaluation of impacts to historical resources consists of a two-part inquiry:
 - a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so;
 - a determination of whether the Project would result in a “substantial adverse change” in the significance of the resource or resources as defined by CEQA.
- For archeological resources, the analysis considers existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were evaluated to determine the potential for uncovering archaeological resources and/or human remains during Project construction. This analysis also relies upon an archeological records search and field testing.

Draft EIR—CULTURAL RESOURCES (Existing Conditions)

Historical Resources within the Project Site:

- The potential Mack Sennett Historic District within the Project Site is historically significant as a grouping of buildings that are collectively representative of a motion picture studio dating from the Major Studio Era. The potential Mack Sennett Historic District contains 10 buildings, of which six are considered contributing buildings to the potential Historic District.
- The existing Mill Building is historically significant as a rare and generally intact example of a motion picture studio mill building from the Major Studio Era.
- The Administration Building is historically significant as an example of brutalist architectural design.
- Stage 2 is historically significant as the shooting location for The Mary Tyler Moore Show, the initial television production of MTM Enterprises.

Archaeological Resources

- While no artifacts were found, the Project Site may contain historical period archaeological deposits and prehistoric archaeological deposits.

Draft EIR—CULTURAL RESOURCES (Project Design Features & Mitigation Measures)

Mitigation Measures & Project Design Features (PDF):

This is a summary – Refer to Section IV.D of Draft EIR for full text

- **CUL-MM-1:** A qualified Historic Preservation Professional shall be retained to ensure that all rehabilitation, relocation, and alteration of historical resources located on the Radford Studio Center property, are conducted in accordance with the Secretary of the Interior's Standards.
- **CUL-MM-2:** Prior to the commencement of demolition, relocation, or rehabilitation work, the Project Site shall be documented in accordance with Historic American Building Survey (HABS) guidelines.
- **CUL-MM-3:** The Project shall include an interpretive program that informs the public about the history of the Project Site.
- **CUL-MM-4:** Establishment of the Mack Sennett Historic District.
- **CUL-MM-21:** Prior to the start of ground disturbance activities, the Project shall retain a Qualified Archaeologist to implement the Project cultural resource mitigation measures.
- **CUL-MM-22:** Prior to the start of Ground Disturbance Activities, the principal archaeologist shall prepare and implement a written geoarchaeological testing plan (GTP) within the area of direct impact where ground-disturbing activities extend more than 12 feet below the existing ground surface.
- **CUL-PDF-1:** The Mill Building will be relocated and rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation. The relocation and reassembly of the Mill Building will be conducted in a manner that preserves the historic base and facades and maintains its integrity so that it remains eligible for historic listing without implying a false historic condition or creating a false sense of historical development.
- **CUL-PDF-2:** Signs attached to the Stage 2 façades will be placed so as not obscure the rectangular form and curved bow-truss roof characteristic of Stage 2.

Draft EIR—CULTURAL RESOURCES (Findings)

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Findings:

Less Than Significant Impacts

- Human Remains

Less Than Significant Impacts with Mitigation

- Historical Resources
- Archaeological Resources

Draft EIR—ENERGY (Significance Thresholds & Methodology)

Significance Thresholds:

Would the Project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Draft EIR Methodology:

- The Project's estimated electricity and natural demands were calculated using CalEEMod based on the proposed uses.
- This demand is then evaluated relative to LADWP's and SoCalGas' existing and planned energy supplies in 2028 (i.e., the Project buildout year) to determine if these two energy utility companies would be able to meet the Project's energy demands.
- The analysis also evaluates whether the Project would result in wasteful, inefficient or unnecessary consumption of energy.

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR—ENERGY (Project Design Features and Findings)

Project Design Features (PDF) incorporated as part of Project:

- Project Design Feature GHG-PDF-1, which will prohibit the use of natural gas during Project operations for new or renovated buildings, excluding food operations (e.g., restaurant/commissary uses).
- Project will be one of the largest first all-electric studios.

Findings:

- **Less Than Significant Impacts**
 - Wasteful, inefficient or unnecessary consumption of energy resources
 - Conflict with or obstruction of a state or local plan for renewable energy or energy efficiency

Draft EIR—GEOLOGY & SOILS (Significance Thresholds & Methodology)

Would the Project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii. Strong seismic ground shaking?
 - iii. Seismic-related ground failure, including liquefaction?
 - iv. Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Draft EIR Methodology:

- To evaluate potential Project impacts relative to geology and soils, the Geotechnical Investigation included the excavation of exploratory borings, collection of representative samples, laboratory testing, engineering analysis, review of published geologic data, and review of available geotechnical engineering information, including 22 previous geotechnical investigations.
- For paleontological resources, an evaluation of existing conditions and previous disturbances within the Project Site, the geology of the Project Site, and the anticipated depths of grading were considered to determine the potential for uncovering paleontological resources. A formal records search for previously identified resources was also conducted.

Project Design Feature to be implemented as part of Project (PDF):

- **GEO-PDF-1:** All development activities conducted on the Project Site will incorporate the professional recommendations contained in the Geotechnical Engineering Evaluation and all associated Addenda and/or alternative recommendations set forth in a site-specific, design-level geologic and geotechnical investigation(s) approved by the City Engineer, provided that such recommendations meet and/or surpass relevant State and City laws, ordinances, and code requirements, including California Geological Survey's Special Publication 117A and the City's Building Code. Such professional recommendations will include, but not limited to, the following and may be revised or superseded in accordance with an approved final geotechnical investigation(s):
 - Excavated fill materials will be removed and exported or properly removed and recompacted as controlled fill for foundation and/or slab support of lightly loaded structures.
 - Imported soil materials will have an Expansion Index of less than 50.
 - At-grade structures with column loads less than 500 kips will be supported on conventional foundations bearing in an engineered fill pad.
 - Foundation piles will be used for high-load office buildings and parking structures.
 - Temporary dewatering will be utilized during construction.
 - Permanent structures will be designed for hydrostatic pressure such that the temporary construction dewatering system will be terminated at the completion of construction.
 - Temporary shoring, such as steel soldier piles, will be installed for excavation of the subterranean levels.

Draft EIR—GEOLOGY & SOILS (Findings)

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Findings:

Less Than Significant Impacts:

- Fault rupture
- Seismic ground shaking
- Liquefaction
- Landslides
- Lateral spreading and subsidence
- Expansive soil
- Soils to support septic tanks

Less than Significant Impacts with Mitigation

- Paleontological Resources

Draft EIR—GREENHOUSE GAS EMISSIONS (Significance Thresholds & Methodology)

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Would the Project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

- Neither the City nor any other applicable agency such as SCAQMD, CARB, or OPR has adopted a numerical significance threshold for GHG emissions. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, consistent with the City's policy, the analysis focuses on the Project's consistency with statewide and regional plans and local initiatives adopted for the purpose of reducing and/or mitigating GHG emissions. Nevertheless, for informational purposes, the Draft EIR quantifies the Project's annual GHG emissions using CalEEMod and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB/SB 32.

Draft EIR—GREENHOUSE GAS EMISSIONS (Project Design Features and Findings)

Project Design Features (PDF):

- **GHG-PDF-1:** The Project will prohibit the use of natural gas during Project operations for new or renovated buildings, excluding food operations (e.g., restaurant/commissary uses).

Other Primary Project Features that Reduce Greenhouse Gas Emissions:

- The Project would implement a TDM Program to encourage the use of transit and reduce single-occupancy vehicle trips.
- As part of the TDM Program, the Project will include mobility hubs that will support first-mile/last-mile connections; encourage employee use of public transit, carpooling, vanpooling, and biking/scooter to work; and support other TDM strategies. The mobility hubs would also support future shuttle services to provide a connection to existing transit stations (e.g., Metro B and G Lines).
- The Project's TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service, a rideshare matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program.

- The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.
- The Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT bus lines. Specifically, there are four local bus routes, including three Metro bus lines and one LADOT DASH route, which run within 0.25 miles of the Project Site.
- The Radford Bridge and Class IV bikeway would improve bicycle access.

Findings:

Less Than Significant Impacts:

- The Project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases

Draft EIR—HAZARDS & HAZARDOUS MATERIALS (Significance Thresholds & Methodology)

Would the Project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Draft EIR Methodology:

- To evaluate potential impacts relative to hazards and hazardous materials, a Phase I ESA was prepared for the Project Site in accordance with the requirements of ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM Standard E1527-13). The Phase I included a visual inspection of the entire Project Site, a survey of the surrounding area, interviews with persons familiar with the Project Site, review of historical sources and agency records, and review of previous and current Project Site reports related to hazards and hazardous materials.

Draft EIR—HAZARDS & HAZARDOUS MATERIALS (Project Design Features, Mitigation Measures and Findings)

Mitigation Measures and Project Design Features:

- **HAZ-MM-1:** The Project shall implement the Soils Management Plan prepared by Geosyntec, which shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- **HAZ-PDF-1:** The Project will comply with, the Spill Prevention, Control, and Countermeasure (SPCC) Plan for the Project Site.
- **HAZ-PDF-2:** The Project will comply with, the Radford Studio Center Emergency Action Plan and associated emergency exit and assembly maps.
- **HAZ-PDF-3:** The Project will comply with, the Radford Studio Center Injury and Illness Prevention Program (IIPP), including the Radford Studio Center Safety Manual.

Findings:

Less Than Significant Impacts:

- Impacts associated with the routine transport, use, or disposal of hazardous materials (construction and operation)
- Significant hazard to the public or environment related to asbestos, lead-based paint, polychlorinated biphenyls, contaminated groundwater and construction materials (construction and operation)
- The handling of hazardous materials and wastes within one-quarter mile of an existing or proposed school (operation)
- Proximity to an airport (construction and operation)
- Emergency access (construction and operation)

Less Than Significant Impacts With Mitigation:

- Significant hazard to the public or environment related to contaminated soils (construction)
- The handling of hazardous materials and wastes within one-quarter mile of an existing or proposed school (construction)
- Location within a hazardous materials site compiled pursuant to Government Code Section 65962.5 (construction)

Draft EIR—HYDROLOGY & WATER QUALITY (Guidelines & Methodology)

Would the Project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 1. Result in a substantial erosion or siltation on- or off-site;
 2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
 3. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 4. Impede or redirect flood flows?
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Draft EIR Methodology:

- Analysis is based on technical reports provided by civil and geotechnical engineers.
- The analysis of surface water quality impacts identifies the types of pollutants associated with construction and operation of the Project and considers their potential effects on surface water quality. Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would reduce potential Project impacts.
- The surface water hydrology analysis evaluates the change in surface water runoff patterns and quantity for the Project Site due to the construction and operation of the Project, and the impact of these changes on the existing downstream stormwater system.
- The analysis of the Project's potential impacts associated with groundwater was based on a review of existing groundwater conditions and groundwater uses, and an evaluation of the potential impacts for construction and operation of the Project to affect those uses and groundwater quality.
- With respect to dewatering, an analysis of the Project's potential impacts associated with dewatering was conducted based on a simulation of dewatering associated with the excavation area most likely to encounter groundwater.

Draft EIR—HYDROLOGY & WATER QUALITY (Project Design Features and Findings)

Project Design Feature (PDF) incorporated into Project:

- **PDF-1 (from Geo):** The subterranean levels of the Project would be designed to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards, and permanent dewatering operations would not be required

Other primary Project components:

- In accordance with regulatory requirements, the Project would implement Low Impact Development (LID) features that would include best management practices that would result in an improvement in surface water quality, an increase in pervious surfaces, an improvement in groundwater recharge, and a reduction in runoff as compared to existing conditions.

Findings:

Less Than Significant Impacts:

- Surface Water Quality (Construction and Operation)
- Groundwater Quality (Construction and Operation)
- Groundwater Supplies and Groundwater Recharge (Construction and Operation)
- Alteration of Drainage Patterns (Construction and Operation)

Draft EIR—LAND USE & PLANNING (Guidelines & Methodology)

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Would the Project:

- a) Physically divide an established community?
- b) Cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

- The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a “significant environmental effect” as defined by CEQA Guidelines Section 15382.
- Plans and regulations that were reviewed included: SCAG’s RTP/SCS; the County of Los Angeles River Master Plan; the City’s General Plan, including the Framework Element, Mobility Plan, Conservation Element, Health and Wellness Element (Plan for a Healthy Los Angeles), and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan; the LAMC, including the provisions of the River Improvement Overlay Ordinance; the Citywide Design Guidelines; and the Los Angeles River Master Plan.

Draft EIR—LAND USE & PLANNING (Findings)

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Findings:

Less Than Significant Impacts:

- Conflict with applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect
- Physical division of an established community.

Draft EIR—NOISE & VIBRATION (Significance Thresholds & Methodology)

Significance Thresholds

Would the Project result in:

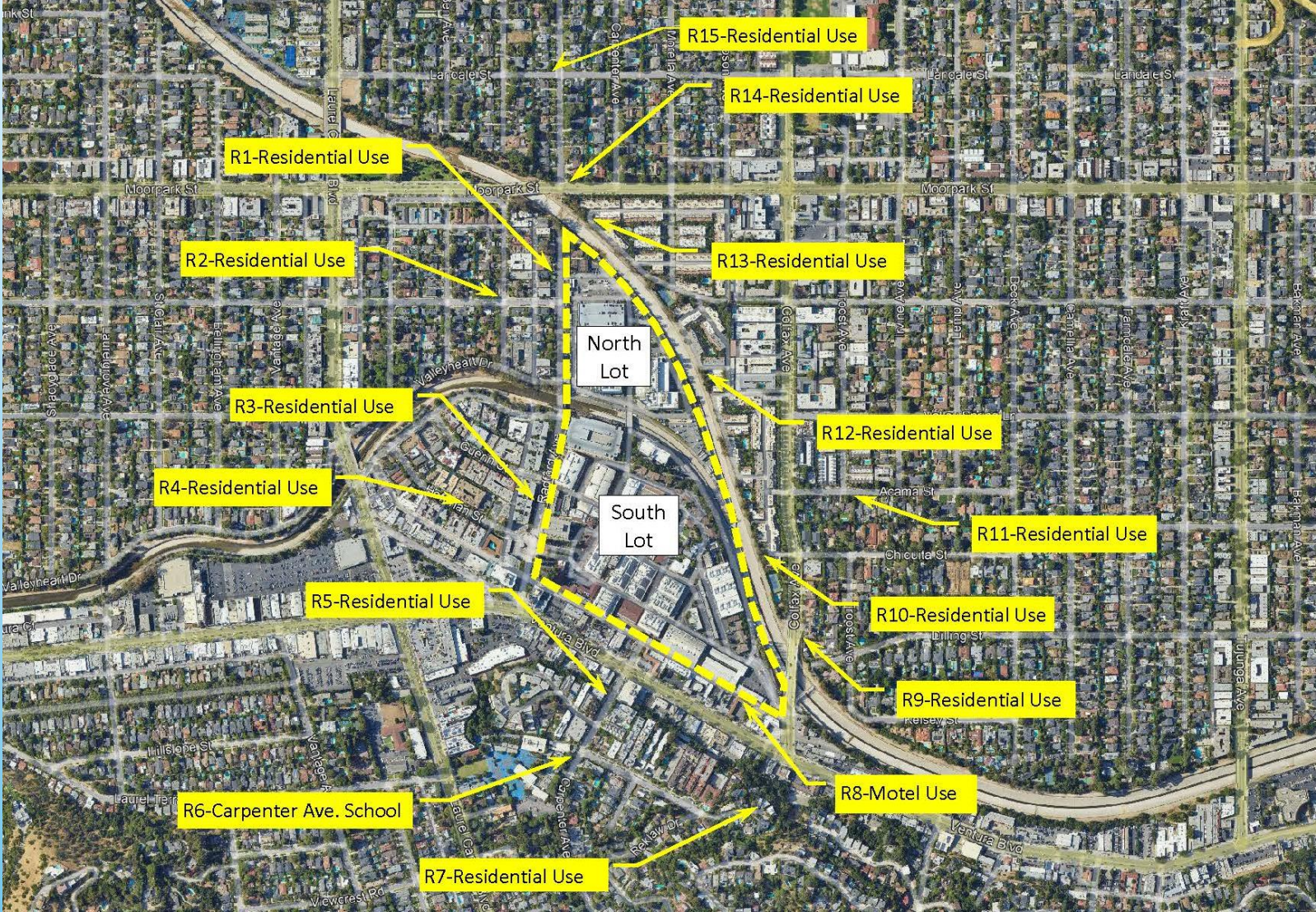
- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Generation of excessive groundborne vibration or groundborne noise levels?
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR Methodology:

- Analysis was prepared by acoustical experts with decades of experience and using the latest noise models.
- The Project's on-site noise impacts were evaluated by calculating the noise levels at representative sensitive receptor locations and comparing these estimated noise levels to the existing ambient noise levels (i.e., noise levels without the Project).
- The Project's off-site noise impacts were analyzed using the Federal Highway Administration's Traffic Noise Model and traffic data from the Project's Transportation Assessment.
- Groundborne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the receptor locations, and comparing the Project's activities to the applicable vibration significance thresholds.

Draft EIR—NOISE & VIBRATION Representative Noise Monitoring Locations



Draft EIR—NOISE & VIBRATION (Mitigation Measures)

Mitigation Measures:

- **NOI-MM-1:** A temporary and impermeable sound barrier shall be erected at the locations listed below during on-site construction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.
 - Along the western property line of the Project Site between the construction areas and the noise sensitive uses to the west, shielding receptor locations R1, R2, R3, and R4. The temporary sound barrier shall be designed to provide a minimum 20-dBA, 11-dBA, 20-dBA, and 5-dBA noise reduction at the ground level of receptor locations R1, R2, R3, and R4, respectively.
 - Along the southern property line of the Project Site between the construction areas and the noise sensitive uses to the south, shielding receptor locations R5, R6, R7, and R8. The temporary sound barrier shall be designed to provide a minimum 5-dBA, 5-dBA, 7-dBA, and 20-dBA noise reduction at the ground level of receptor locations R5, R6, R7, and R8, respectively.
 - Along the eastern boundary of the North Lot and South Lot between the construction areas and the noise sensitive uses to the east, shielding receptor locations R9, R10, R11, and R12. The temporary sound barrier shall be designed to provide a minimum 13-dBA, 20 dBA, 5-dBA, and 18-dBA noise reduction at the ground level of receptor locations R9, R10, R11, and R12, respectively.
 - Along the northern property line of the Project Site between the construction areas and the noise sensitive uses to the north, shielding receptor locations R13 and R14. The temporary sound barrier shall be designed to provide a minimum 18-dBA and 8-dBA noise reduction at the ground level of receptor locations R13 and R14, respectively.
- **NOI-MM-2:** A temporary and impermeable sound barrier shall be erected at the locations listed below during off-site construction. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure
 - During the off-site construction along Radford Avenue, provide a temporary movable noise barrier between the construction equipment and the residences along the west side of Radford Avenue. The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the ground level of nearby residences west of Radford Avenue (receptor locations R1 through R4).
 - During the off-site construction along the southern alley, along Carpenter Avenue (south of the Project Site), and along Colfax Avenue, provide a temporary movable noise barrier between the construction equipment and the multi-family residential use, school use, and hotel uses to the south (receptor locations R5, R6, and R8). The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the at the ground level of receptor locations R5, R8, and R9, and 5-dBA noise reduction at receptor location R6.

Draft EIR—NOISE & VIBRATION (Mitigation Measures and Project Design Features)

Mitigation Measures:

NOI-MM-2 (Continued)

- During the off-site Radford Bridge construction, provide a temporary movable noise barrier between the construction equipment and the residences to the south (receptor locations R1 and R2) and to the north (receptor locations R12 through R15). The temporary noise barrier shall be designed to provide a minimum 7-dBA, 5-dBA, 5-dBA, 10-dBA, 10-dBA, and 5-dBA noise reduction at the at the ground level of receptor locations R1, R2, R12, R13, R14, and R15, respectively.
- During the construction of the off-site Los Angeles Department of Water and Power Water Line Upgrades, provide a temporary movable noise barrier between the construction equipment and the residences to the west (receptor locations R1 through R4), to the north (Receptors R13 and R14), to the south (Receptor R6), and the residences along Valleyheart Drive. The temporary noise barrier shall be designed to provide a minimum 10-dBA noise reduction at the ground level of receptor locations R1, R2, R3, R4, R13, R14, and residences along the south side of Valleyheart Drive, 6-dBA noise reduction at the residences along the north side of Valleyheart Drive (north of the Los Angeles River), and 5-dBA noise reduction the ground level of Receptor R6.

Project Design Features:

- Project Design Feature NOI-PDF-1: Outdoor mounted mechanical equipment will be enclosed or screened by the building design (e.g., a roof parapet or mechanical screen) from the view of off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square foot) and break the acoustic line-of-sight from the equipment to the off-site noise-sensitive receptors.
- Project Design Feature NOI-PDF-2: Outdoor filming (“Exterior Shoots”) will not occur along the perimeter of the Project Site without prior notification of residents within a 500-foot radius of the property.

Findings:

Less than Significant Impacts:

- On-site operational noise including noise from mechanical equipment, parking facilities, trash collection activities, mobility hubs, outdoor production activities, basecamps, on-site vehicles, off-site traffic, and on-site traffic.
- On-site and off-site vibration associated with building damage (construction and operation)
- On-site and off-site vibration associated with human annoyance (operation)

Significant and Unavoidable Impacts:

- Noise from on-site construction activities – after mitigation, impacts would remain at R3 and R8 at the upper levels. Impacts would be less than significant at the remaining sensitive receptors.
- Noise from off-site construction activities (Haul Trucks) – would exceed the threshold by up to 6.1 dBA along Radford Avenue, and would be less than significant at the remaining haul routes.
- Noise from construction of off-site improvements – after mitigation, noise impacts would remain significant at receptor locations R1, R3, R8, and R13 during the short-term duration of construction of the off-site improvement.
- On-site vibration associated with human annoyance would exceed the 72-VdB significance threshold at receptor locations R1, R3, and R8. Impacts would be limited to short durations, approximately one day during paving of on-site driveways (with the vibratory roller operating within 140 feet of the receptor locations).
- Off-site vibration associated with human annoyance from trucks along alley and from off-site improvements. Impacts from the off-site improvements would be limited to approximately one day during paving.

Draft EIR—PUBLIC SERVICES (Guidelines & Methodology)

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Would the Project:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?

Police protection?

Source: Appendix G CEQA Guidelines Adopted by the City of LA.

Draft EIR Methodology:

Public Services—Fire

A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce the demand for fire protection and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. The ultimate determination of whether a project would result in a significant impact on the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable as a direct or indirect effect of the project. The LAFD was consulted as part of preparation of the analysis.

Public Services—Police

According to the L.A. CEQA Thresholds Guide, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. The ultimate determination of whether a project would result in a significant impact on the environment related to police protection is determined by whether construction of new or expanded police protection facilities is reasonably foreseeable as a direct or indirect effect of the project. The LAPD was consulted as part of preparation of the analysis.

Draft EIR—PUBLIC SERVICES (Project Design Features)

Project Design Features:

- **Project Design Feature POL-PDF-1:** During Project construction, the Applicant will implement temporary security measures, including security fencing, low-level security lighting, locked entry, and security patrols.
- **Project Design Feature POL-PDF-2:** During operation, the Project will incorporate a 24/7 security plan to ensure the safety of its employees and visitors. The Project's security plan will include, but not be limited to, the following design features:
 - Security fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter;
 - Secured points of entry with elements, such as guard booths, key card passes, and pedestrian and vehicular access controls;
 - A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas;
 - Private on-site security staff, including at guard booths, to control entry and regular security patrols of the Project Site; and
 - Appropriate staff training on security protocols, including Project Site and building access control, managing and monitoring fire/life/safety systems, and patrolling the Project Site.

Project Design Features (continued):

- **Project Design Feature POL-PDF-3:** The Project will include appropriate lighting of buildings and walkways to provide for pedestrian orientation and to clearly identify secure routes between parking areas and points of entry into buildings.
- **Project Design Feature POL-PDF-4:** The Project will include appropriate lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.
- **Project Design Feature POL-PDF-5:** The design of the Project's entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways will be open and in view of surrounding sites.
- **Project Design Feature POL PDF 6:** Prior to the issuance of a building permit, the Applicant will consult with the LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project.

Draft EIR—PUBLIC SERVICES (Project Design Features and Findings)

Project Design Features (continued):

- **Project Design Feature POL-PDF-7:** Upon completion of Project construction and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to LAPD's North Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

Findings:

- **Impacts related to fire protection and police protection would be less than significant during both construction and operation of the Project.**

Draft EIR—TRANSPORTATION (Significance Thresholds & Methodology)

Would the Project:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? (which addresses Vehicle Miles Traveled)
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?

Source: Appendix G CEQA Guidelines Adopted by the City of LA.

Draft EIR Methodology:

- The Transportation Assessment was prepared by Gibson Transportation Consulting pursuant to LADOT's Transportation Assessment Guidelines (TAG).
- The analysis of Project consistency with plans is based on a comparison of the Project to adopted plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- LADOT's VMT Calculator was used to estimate project-specific daily work VMT per employee for the Project. The resulting data is then compared to the applicable threshold adopted by the City.
- Based on the number of trips generated by the Project and as required by the TAG, the transportation also includes a freeway analysis. A project would result in a significant impact at such a ramp if each of the certain criteria are met related to off-ramp queuing, queue length, and mainline freeway speeds.
- Per the TAG, the analysis also addresses hazardous design features and emergency access.

Draft EIR—TRANSPORTATION (Project Design Features)

Project Design Features:

- **Project Design Feature TR-PDF-1:** A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval prior to commencing construction. The Construction Traffic Management Plan will formalize how Project construction will be carried out and identify specific actions that will reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:
 - The Applicant will designate a construction manager to serve as a liaison with the surrounding community and respond to any construction-related inquiries. Publicly-visible signs will be posted at various locations with the liaison's information and phone number to contact regarding inquiries and/or complaints, including dust complaints. The South Coast Air Quality Management District's phone number will also be included to ensure compliance with applicable regulations.
 - Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
 - Prohibition of construction worker or equipment parking on adjacent streets or in predominantly residentially zoned areas.
 - Temporary pedestrian, bicycle, and vehicular traffic controls (e.g., flag people trained in pedestrian and bicycle safety at the Project Site's driveways) during all construction activities adjacent to Radford Avenue, Ventura Boulevard, and Colfax Avenue, to ensure traffic safety on the public right-of-way.
 - Scheduling of construction-related activities to reduce the effect on traffic flow on surrounding major roadways.
 - Containment of construction activity within the Project Site boundaries.
 - Coordination with the Los Angeles Department of Transportation (LADOT) Parking Meter Division to address any potential loss of metered parking spaces.
 - Implementing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers. Rerouting construction trucks to reduce travel on congested streets.
 - Provision of dedicated turn lanes for the movement of construction trucks and equipment on- and off-site, subject to LADOT review and approval.
 - Prohibition of haul truck staging on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route.
 - Spacing of trucks so as to discourage a convoy effect.
 - Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
 - Maintenance of a log, available on the Project Site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day.

Draft EIR—TRANSPORTATION (Project Design Features)

Project Design Features (continued):

- **Project Design Feature TR-PDF-2:** The Project will implement a series of transportation demand management (TDM) measures that exceed the requirements established in the existing TDM Ordinance. The TDM strategies will be implemented for the Project Site as a whole and will be available to both the existing and new employees on-site. The TDM Program will be subject to review and approval by the City, and the Applicant will record a Covenant and Agreement to ensure that the TDM Program will be maintained. The following TDM strategies will be implemented as proposed under the TDM Program:
 - **Education Programs/On-Site Coordinator:** A coordinator will reach out to employees directly to promote the benefits of TDM. The coordinator would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, ride-share/carpool/vanpool programs, and parking incentives.
 - **Transportation Information Center/Kiosks via Mobility Hubs:** The Project will install a transportation information center at the Mobility Hubs. The transportation information center will provide employees and visitors with information regarding transit, commute programs, and non-vehicular travel planning. Informational digital bulletin boards and wayfinding information will be displayed along pedestrian paths to direct pedestrians to the Mobility Hubs, nearby transit stops, bicycle parking, and bikeshare facilities.
 - **Bicycle Amenities:** In addition to the short-term and long-term bicycle parking spaces provided in accordance with the LAMC, the Project would also provide showers, lockers, and bicycle service areas and repair stands within the Project Site to facilitate bicycle use. The Project would incorporate features for bicyclists, such as exclusive access points and secured bicycle parking facilities. The Project Applicant would also contribute toward the implementation of bicycle improvements within the Study Area under the Mobility Plan.
 - **Pedestrian Amenities:** The Project will incorporate features for pedestrians, such as landscape improvements, exclusive access points, and upgraded pedestrian facilities and bus stops. Additionally, the Project Site will be designed to be a safe, friendly, and convenient environment for pedestrians. The Project will provide more pedestrian-friendly sidewalks and areas along Radford Avenue, Colfax Avenue, and Moorpark Street, and maintain internal walkways throughout the Project Site. The Applicant will also contribute toward pedestrian facilities improvements as part of Vision Zero.
 - **Ride-Share Matching and Carpool/Vanpool Program:** The on-site TDM coordinator will provide ride-share matching services to match interested employees with similar commuters into carpools and vanpools.

Draft EIR—TRANSPORTATION (Project Design Features)

Project Design Features (continued):

- **Neighborhood Enhancements:** The Project will enhance the transportation mobility around the immediate Project Site area to encourage alternative transportation modes and connections to the Project Site from off-site locations. The Project will also enhance existing crosswalks at the signalized intersections in the Project area to current LADOT standards. As part of the Radford Bridge, the Project will provide public pedestrian and bicycle access from Moorpark Street to Ventura Boulevard via Radford Avenue, while prohibiting through access north and south along Radford Avenue for vehicles. Access to the Los Angeles River and Tujunga Wash will also be enhanced.
- **First-Mile/Last-Mile Options:** In recent years, there has been a proliferation of new options for personal transportation that help to address first-mile/last-mile connectivity issues with public transit. These options include motorized scooters, skateboards, and bicycles, as well as human-powered bicycles. Some of these options involve personal ownership (various types of electric skateboards, bicycles, and scooters) and some are publicly available for short-term rentals (electric scooters, Metro Bike Share pedal-powered bicycles). These services are rapidly evolving and gaining widespread acceptance, and it is anticipated that by the time the Project is completed, the landscape for these services, as well as the regulatory issues surrounding some of them, may look substantially different. The Applicant is committed to forward-thinking mobility solutions in the design and implementation of the Project and intends to provide support for such services at the Mobility Hubs. These services give employees a variety of travel mode choices and, therefore, encourage the use of non-automobile modes of transportation to and from the Project Site and reduce VMT.
- **Carpool/Vanpool Parking and Loading via Mobility Hubs:** The Mobility Hub(s) will provide safe and convenient passenger loading areas for employee carpools/vanpools along with access to the Project Site's internal roadway network to get to the parking structures. Additional passenger loading areas are also proposed within the Project Site at the Mobility Hubs.
- **Guaranteed Ride Home Program:** A Guaranteed Ride Home program assures that transportation service will be provided to individuals who commute without their personal automobiles. This program overcomes one of the primary concerns of those who may choose alternative modes of transportation, which is how to get home or to a child's school in case of an emergency. In the event of personal or family emergencies, the individual will be reimbursed for a taxi ride, ride-share ride, or short-term car rental. This program will cover all employees participating in the carpool/vanpool program or using transit to and from the Project Site. A support service, such as Guaranteed Ride Home, is an important part of TDM implementation that assures an individual will not be dependent on a carpool or transit schedule in the event of an emergency.

Findings:

- **All impacts related to transportation would be less than significant during both construction and operation including:**
 - Conflicts with plans related to transportation
 - Vehicle miles traveled
 - Freeway safety impacts
 - Potentially hazardous design features
 - Emergency access

Draft EIR—TRIBAL CULTURAL RESOURCES (Guidelines & Methodology)

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Would the Project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Draft EIR Methodology:

- The analysis of tribal cultural resources is based on the results of the AB 52 consultation process with applicable Native American Tribes and the TCR Report which reviews the physical and ethnographic history of the Project Site. The presence and significance of a potential tribal cultural resource is determined through consultation between the lead agencies and local Native American Tribal representatives.

Draft EIR—TRIBAL CULTURAL RESOURCES (Mitigation Measures)

Mitigation Measures:

- **Mitigation Measure TCR-MM-1:** Prior to commencing any clearing, grubbing, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity (Ground Disturbance Activities) at the Project Site, the Applicant, or its successor, shall retain a tribal monitor(s) that is qualified to identify subsurface tribal cultural resources. Any qualified tribal monitor(s) shall be approved by the tribe they represent. Any qualified archaeological monitor(s), pursuant to Mitigation Measure CUL-MM-21, shall be approved by the Department of City Planning, Office of Historic Resources (OHR).
 - The qualified tribal monitor(s) shall always observe all Ground Disturbance Activities on the Project Site the Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site that cannot be reasonably monitored by one archaeological monitor and one tribal monitor, additional monitors shall be assigned as needed to ensure adequate coverage as determined by a qualified archaeologist, in consultation with the qualified tribal monitor(s).
 - On-site monitoring shall continue until written notice is received by the monitoring tribe(s) from the Applicant that all Ground Disturbance Activities that require tribal monitoring are complete. If Ground Disturbance Activities that require tribal monitoring are temporarily suspended, written notice of suspension shall be submitted to the tribe by the Applicant within one day of stopping work. The Applicant shall provide five days' written notice (if feasible) to the tribe prior to resuming any Ground Disturbance Activities that require monitoring. The on-site monitoring shall end when the Ground Disturbance Activities are completed, or when the archaeological and tribal monitor(s) both indicate that the specific area within the Project Site has a low potential for containing tribal cultural resources.
 - Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor(s), shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities. As part of the WEAP training, construction crews shall be briefed on regulatory requirements for the protection of tribal cultural resources, and proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in Ground Disturbance Activities.

Draft EIR—TRIBAL CULTURAL RESOURCES (Mitigation Measures)

Mitigation Measures (continued):

- In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within a 25-foot radius (50-foot diameter) of the area of discovery (“Discovery Area”). If a 25-foot radius is not possible due to Project Site constraints, a suitable and safe radius shall be determined by a qualified archaeologist, in consultation with the qualified tribal monitor(s), to ensure the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
 1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities within the Discovery Area and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; and (2) OHR.
 2. If OHR determines, in their reasonable discretion and supported by substantial evidence pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future Ground Disturbance Activities, as well as the treatment and disposition of any discovered tribal cultural resources. The City and/or Applicant shall, in good faith, consult with the monitoring tribe(s) on the disposition and treatment of any tribal cultural resource encountered during all Ground Disturbance Activities. If human remains or funerary objects are encountered during any Ground Disturbance Activities associated with the Project, such activities within a 50-foot radius (100-foot diameter) shall temporarily cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5, and that code shall be enforced for the duration of the Ground Disturbance Activities. If a 50-foot radius is not possible due to Project Site constraints, a suitable and safe radius shall be determined by a qualified archaeologist, in consultation with the qualified tribal monitor(s). The subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.

Draft EIR—TRIBAL CULTURAL RESOURCES (Mitigation Measures)

Mitigation Measures (continued):

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor(s), reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archaeologist shall develop a list of reasonable actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the NAHC and in compliance with any applicable federal, state or local law, rule or regulation
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable by the qualified archaeologist and qualified tribal monitor(s), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require that the recommendation be implemented as originally proposed by the archaeologist and tribal monitor(s); (2) require that the recommendation, as modified by the City, be implemented, provided that the modified recommendation is at least equally as effective to mitigate a potentially significant impact to a tribal cultural resource; (3) require that a substitute recommendation be implemented, provided that the substitute recommendation is at least equally as effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require that the recommendation be implemented because it is not necessary to mitigate a potentially significant impact to a tribal cultural resource. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

Draft EIR—TRIBAL CULTURAL RESOURCES (Mitigation Measures and Findings)

Mitigation Measures (continued):

6. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the Discovery Area, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor(s) and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence Ground Disturbance Activities inside of the Discovery Area only after it has complied with paragraphs 2 through 5 above.
8. Copies of any tribal cultural resources study or report, detailing the nature of tribal cultural resources, remedial actions taken, and disposition of tribal cultural resources resulting from MM-TCR-1 shall be submitted to the South-Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the NAHC for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Findings:

- **Implementation of Mitigation Measure TCR-MM-1 would fully mitigate impacts to tribal cultural resources to a less than significant level.**

Draft EIR—UTILITIES & SERVICE SYSTEMS (Guidelines & Methodology)

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Would the Project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Draft EIR Methodology:

Utilities and Service Systems—Water Supply

The analysis of the Project's impacts to water supply is based on the WSA prepared and adopted by the LADWP Commissioners for the Project pursuant to SB 610. The WSA includes a conservative calculation of the Project's anticipated water demand by applying the City's wastewater generation rates to the proposed land uses associated with the Project. The analysis also includes a comparison of the estimated net water demand for the Project to the available capacity of the existing water infrastructure.

Utilities and Service Systems—Wastewater

To evaluate potential impacts relative to wastewater treatment capacity, this analysis evaluates whether adequate treatment capacity within the Hyperion Water Reclamation Plant would be available to accommodate the Project based on the estimate of the Project's wastewater generation and data from LASAN.

Source: Appendix G CEQA Guidelines Adopted by the City of LA

Draft EIR—UTILITIES & SERVICE SYSTEMS (Guidelines & Methodology)

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Draft EIR Methodology (Continued):

Utilities and Service Systems—Solid Waste

The Project's potential solid waste impacts are based on an analysis of the estimated amount of waste generated during both construction and operation of the Project relative to area-wide disposal rates and the remaining capacity at facilities serving the Project area as identified in the Countywide Integrated Waste Management Plan Annual Report. The existing and projected amount of solid waste generated is determined by using a per-unit waste generation factor, which is derived from relevant guidance documents from CalRecycle and the USEPA, for the various uses.

Draft EIR Methodology (Continued):

Utilities and Service Systems—Energy Infrastructure

The analysis evaluates the potential impact of the Project on existing energy infrastructure by comparing the estimated Project energy demand with the available capacity. As noted above, the Project's energy demand is calculated using CalEEMod. Will-serve letters from LADWP and SoCalGas demonstrate that sufficient electricity and natural gas infrastructure exists around the Project Site to serve the Project.

Draft EIR—PUBLIC SERVICES (Project Design Features and Findings)

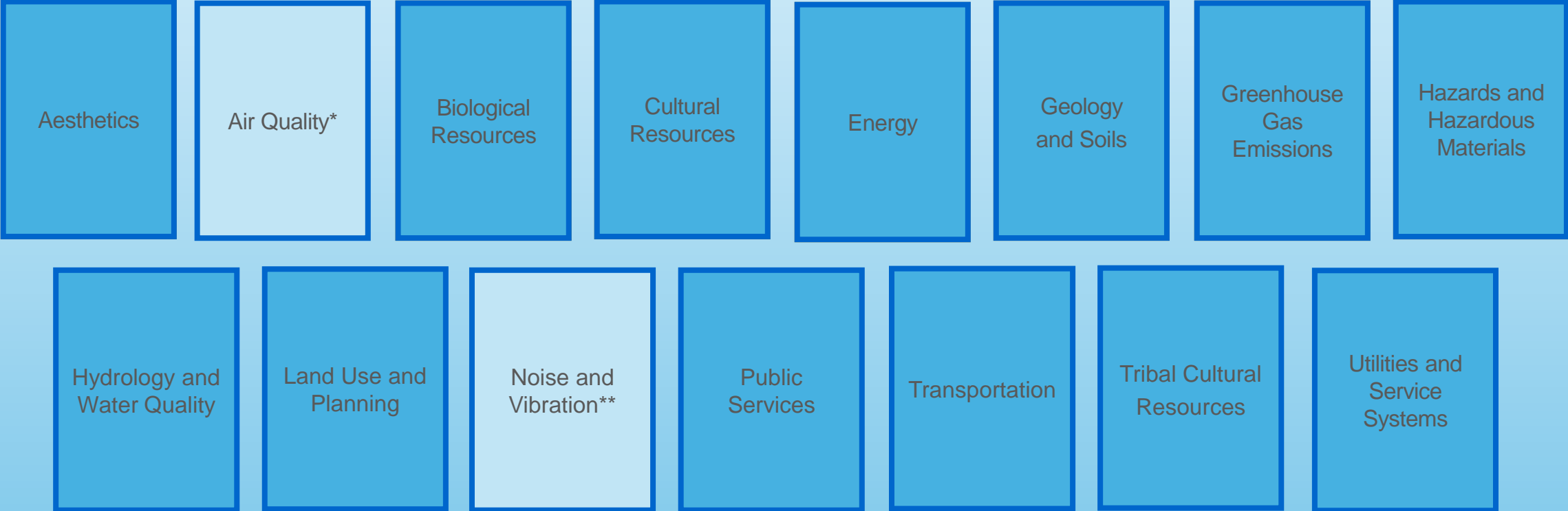
Project Design Features:

- **Project Design Features WAT-PDF-1:** In addition to applicable regulatory requirements, the Project will incorporate the following water conservation features as set for in the Water Conservation Commitment Letter for the Project included as Appendix B of the WSA.
 - ENERGY STAR—Certified Residential Dishwashers—standard with 3.0 gallons/cycle or less
 - High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less
 - Showerheads with a flow rate of 1.5 gallons per minute, or less
 - Drip/Subsurface Irrigation (Micro-Irrigation)
 - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)

Findings:

- **All impacts related to utilities and service systems during both construction and operation would be less than significant including:**
 - Water Supply
 - Wastewater
 - Solid Waste
 - Electricity, Natural Gas, and Telecommunications Infrastructure

Environmental Topics Studied (Significant Impacts Limited to Construction-Related Impacts in Two Resource Areas/Topics All Operational Impacts are Less Than Significant)



* Temporary Regional Air Quality Impact During Construction and Concurrent Construction & Operation

**Temporary Noise and Vibration (Human Annoyance) Impact During Construction