

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

In September 2013, the Governor signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 adds California Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” California PRC Section 21099 defines an “employment center project” as a project located on a property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is located within a transit priority area; and a “transit priority area” as an area within 0.5 miles of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” California PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The Project Site would meet the criteria set forth in SB 743 because it is (1) an infill site; (2) located within a transit priority area (TPA) within 0.5 miles of the Los Angeles County Metropolitan Authority (Metro) Vermont/Sunset Station, a Metro Rail Station and Rapid Stop considered a major transit stop; and (3) an employment center project. Because the Project meets the criteria set forth under SB 743, aesthetic impacts associated with the Project would not be considered significant. In addition, Zoning Information (ZI) File No. 2452¹ states that projects meeting the SB 743 criteria are exempted from determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. Therefore, evaluation of the Project’s physical impacts associated with aesthetics is not required in this EIR and is provided for informational purposes only. Pursuant to California PRC Section

¹ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA, accessed August 15, 2017.

21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in Section IV.D, Cultural Resources, of this Draft EIR.

As stated in Chapter III, Project Description, of this Draft EIR, the term “Project Site” refers to the properties on which the proposed redevelopment would occur. The Project Site is comprised of six building sites (Building Sites), identified herein as Sites 1 through 6, and depicted on Figure II-4, Proposed Site Plan, in Chapter II.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding Schools at the state and local levels. Described below, these include:

- SB 743
- State Scenic Highway System
- California Code of Regulations, Title 24
- California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3)
- California Energy Code (Title 24, Part 6)
- California Green Building Standards Code (Title 24, Part 11)
- City of Los Angeles General Plan Framework Element
- Hollywood Community Plan
- Hollywood Community Plan Update (Draft)
- Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan
- Los Angeles Municipal Code
 - Lighting Regulations
 - Street Tree Replacement and Planting In-Lieu Fee
 - Tree and Shrub Preservation Ordinance No. 186873

(1) State

(a) SB 743

Among other provisions, SB 743 adds California PRC Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Please refer to the detailed summary of SB 743 in the Introduction above.

(b) State Scenic Highway System

State scenic highways are segments of interstates and highways included in the California Scenic Highway Program. Maintained and operated by the California Department of Transportation (Caltrans), which has full control of all state highways, the state program's goal is to protect and enhance California's scenic beauty by identifying those portions of state highways that, together with adjacent scenic corridors, require special conservation treatment.² The Scenic Highway Program includes both eligible and officially designated State scenic highways. Once a state route is included on the list of highways eligible for scenic highway designation in California Streets and Highways Code Section 263, it may be nominated for official designation by the local governing board with jurisdiction over the lands adjacent to the proposed scenic highway. The application to nominate eligible scenic highways for official designation requires the preparation of a visual assessment and scenic highway proposal that must be reviewed and approved by the district and State scenic highway coordinators at Caltrans.

In addition to eligible and officially designated State scenic highways, the California scenic highway system includes a system of California Historic Parkways.³ Two components of the California highway system have been designated as Historic Parkways: State Route (SR-) 110 (Arroyo Seco Historic Parkway) from U.S. 101 just outside downtown Los Angeles (milepost 23.69) to East Glenarm Street in Pasadena (milepost 31.89); and SR-163 (Cabrillo Freeway) through Balboa Park in the City of San Diego (postmiles 0.5 and 3.0). SR-110 (Arroyo Seco Parkway) is also a National Scenic Byway. The nearest Historic Parkway segment of the Arroyo Seco Parkway is located approximately 3.4 miles to the southeast of the Project Site.

The nearest officially designated State scenic highway, SR-27 (Topanga Canyon State Scenic Highway), is located over 16 miles to the west of the Project Site. The nearest

² California Department of Transportation (Caltrans), Scenic Highway Guidelines, October 2008.

³ California Streets and Highways Code Article 2.5 Sections 260–283.

eligible state scenic highway, Interstate (I-) 210 from I-5 near Tunnel Station to Route 134, is located approximately 9 miles northeast of the Project Site.⁴

(c) *California Code of Regulations, Title 24*

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The 2019 California Building Standards Code was published July 1, 2019, with an effective date of January 1, 2020. The following components of Title 24 include standards related to lighting.

(d) *California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3)*

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

(e) *California Energy Code (Title 24, Part 6)*

The California Energy Code (CEC) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with Illuminating Engineering Society (IES) TM-15-11, Addendum A, and shall be provided with a minimum of 40 percent dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to street lights for the public right-of-way, signs, or building façade lighting.

CEC Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in CEC Section 10-114. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Façade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

CEC Section 130.3 stipulates sign lighting controls with any outdoor sign that is on during both day and nighttime hours must include a minimum 65 percent dimming at night. CEC Section 140.8 sets forth lighting power density restrictions for signs.

⁴ Caltrans, California Scenic Highways, 2021.

(f) *California Green Building Standards Code (Title 24, Part 11)*

The California Green Building Standards Code, which is Part 11 of Title 24, is commonly referred to as the CALGreen Code. The CALGreen Code stipulates maximum allowable light levels, efficiency requirements for lighting, miscellaneous control requirements, and light trespass requirements for electric lighting and daylighting. Paragraph 5.106.8, Light Pollution Reduction, specifies that all nonresidential outdoor lighting must comply with the following:

- The minimum requirements in the CEC for Lighting Zones 1-4 as defined in Chapter 10 of the California Administrative Code; and
- BUG ratings as defined in the Illuminating Engineering Society of North America's Technical Memorandum on Luminaire Classification Systems for Outdoor Luminaires (IES NA TM-15-07); and
- Allowable BUG ratings not exceeding those shown in Table A5.106.8 in Section 5.106.8 of the CALGreen Code; or
- Comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

(2) Local

(a) *City of Los Angeles General Plan Framework Element*

The City's General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, provides direction regarding the City's vision for future growth and development. The Framework Element includes an Urban Form and Neighborhood Design chapter, which helps guide the design of future development. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. The overall Project Site is located within an area designated as Community Center in the Framework Element, and with the exception of Site 1, is also designated as a Pedestrian-Priority Streets and Districts area. A strong pedestrian orientation is encouraged in these subareas so the center can serve as a focus of activity and investment for the surrounding community.⁵

The Urban Form and Neighborhood Design chapter establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods through two design principles. First, "Urban Form" refers to the general pattern of building heights and

⁵ City of Los Angeles, Citywide Pedestrian & Transit-Related Priorities Linked to Urban Form, Figure 8-2 of the General Plan Framework Element, May 1996.

development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. Second, “Neighborhood Design” refers to the physical character of neighborhoods and communities within the City. With respect to neighborhood design, the Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The Project’s consistency with the Framework Element is discussed in Section IV.I, Land Use and Planning, of this Draft EIR.

(b) Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan, one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. The purpose of the Hollywood Community Plan is to promote an arrangement of land use, circulation, and services that encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Hollywood community within the larger framework of the City. In addition, the Hollywood Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible. The Hollywood Community Plan, adopted in 1988, is being updated and the Draft EIR for the Hollywood Community Plan Update (ENV-2016-1451-EIR) was released in November 2018. After publication of the Draft EIR, portions of the document were recirculated for public review in October 2019 and according to the City, the Community Plan Update adoption process is estimated to start in 2021.⁶

Objective 7 of the Hollywood Community Plan is the only policy objective that is relevant to scenic quality. Objective 7 is “to encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.”⁷

The Project’s consistency with the Hollywood Community Plan is discussed in Section IV.I, Land Use and Planning, of this Draft EIR. Project consistency with Objective 7 is discussed later in this section for informational purposes only.

(c) Hollywood Community Plan Update (Draft)

Released in August 2020, the Draft Hollywood Community Plan Update directs anticipated development to already urbanized (and suitable) portions of the Community

⁶ City of Los Angeles, Hollywood Community Plan Update, 2021.

⁷ City of Los Angeles, Hollywood Community Plan, December 13, 1988.

Plan Area while preserving existing low-scale neighborhoods. The Draft Hollywood Community Plan Update consists of revisions to the goals and policies of the current community plan (1988), revisions to the community plan land use map, and zoning updates to certain areas to implement the Community Plan's goals and policies.

Except for Site 6, redevelopment properties within the Project Site are designated Community Commercial on the Proposed Land Use Map⁸ of the Draft Hollywood Community Plan Update. Site 6 is designated Low Medium II Residential on the Proposed Land Use Map. Applicable policies for Commercial Districts in the Hollywood Community Plan Update that relate to Project aesthetics include the following:

Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.

Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, setbacks, rear elevations and landscaping of new development adjacent to residential districts.

Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity.

Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.

The Project's consistency with the Hollywood Community Plan Update is discussed in Section IV.I, Land Use and Planning, of this Draft EIR. For those policies that relate specifically to the appearance of development, Project consistency is discussed later in this section for informational purposes only.

(d) Vermont/Western Transit Oriented District Station Neighborhood Area Plan Specific Plan

The Vermont/Western Transit Oriented District (TOD) Specific Plan/Station Neighborhood Area Plan (SNAP) is intended to implement the goals and policies of the Hollywood Community Plan, the Wilshire Community Plan, the Framework Element, and the Mobility Element. The regulations of the SNAP are in addition to those set forth in the Planning and Zoning Provisions of Chapter 1 of Los Angeles Municipal Code (LAMC). Wherever the SNAP contains provisions that require or permit greater or lesser setbacks, street dedications, open space, densities, heights, uses, parking, or other controls on

⁸ City of Los Angeles, Hollywood Community Plan Update, General Plan Land Use Map, April 2014.

development than would be allowed or required pursuant to the provisions contained in Chapter 1 of the LAMC, the regulations of the SNAP prevail and supersede the regulations of the LAMC.

Most of the Project Site (except for Site 6) is in the SNAP area. Sites 1, 2, 4, and 5 are located within Subarea C of the SNAP. The southern portion of Site 3 is located within Subarea C – Community Center of the SNAP and the northern portion occupied by a parking garage is within Subarea B – Mixed Use Boulevards. Site 6 is currently outside of the SNAP area. However, the proposed Project entitlements include an application for a SNAP Amendment to modify the boundaries of the SNAP area to include both Site 6 and portions of Site 3 in Subarea C of the SNAP. If this SNAP Amendment is approved by the City, the entire Project Site would be located within Subarea C of the SNAP.

Subarea C, Community Center, allows residential, hospital and medical, and commercial uses. Specifically, residential uses permitted in the R4 Zone by LAMC Section 12.11, Hospital and Medical Uses,⁹ and commercial uses permitted in the C4 Commercial Zone by LAMC Section 12.16, Live/Work Quarters and Small Assembly Workshops, are permitted on any lot located within Subarea C. Generally, Hospital and Medical Uses within Subarea C may not exceed a maximum building height of 100 feet and a maximum FAR of 3.0, provided that roofs and roof structures are set back a minimum 10 feet from the roof perimeter and screened from view at street level by a parapet or a sloping roof. However, any Existing Hospital Replacement In-Patient Facility Project¹⁰ may have a building height of to 150 feet. Lastly, the Director of Planning may approve additional height for Hospital and Medical Use buildings up to 200 feet, plus the height of roofs and roof structures, and additional FAR for Hospital and Medical Uses up to 4.5 FAR.

As the Project Site is not and would not be adjoining or abutting a lot in Subarea A, the transitional height limits established for Subarea C development are not applicable to the Project.

⁹ As defined in the Vermont/Western Transit Oriented District Specific Plan, Hospital and Medical Uses include hospital and medical office uses, medical clinics, medical service facilities and ancillary medical-related uses, including pharmacies, medical laboratories and teaching or research facilities.

¹⁰ As defined in the Vermont/Western Transit Oriented District SNAP Specific Plan, a Replacement In-Patient Facility consists of a project constructed in conjunction with the replacement of an existing building or structure, pursuant to and in compliance with the Alfred E. Alquist Hospital Facilities Seismic Safety Act, as amended, and set forth at Health and Safety Code Sections 129675, et seq.

In terms of scenic quality, the SNAP is intended to facilitate the following¹¹:

- Create a transit friendly area by requiring conformance to pedestrian oriented design guidelines that establish building facade treatments, landscape standards, criteria for shade-producing building overhangs and awnings, street lighting and security lighting for streets, alleys, sidewalks and other pedestrian areas that adjoin new development;
- Promote increased flexibility in the regulation of the height and bulk of buildings as well as the design of sites and public streets in order to ensure a well-planned combination of commercial and residential uses with adequate open space; and
- Support the hospital core near the corner of Sunset Boulevard and Vermont Avenue such that this industry will generate jobs and medical services for local residents, give local businesses expanded markets, and provide a coherent architectural presence at that corner.

(e) Los Angeles Municipal Code

Chapter 1 of the LAMC, also referred to as the City of Los Angeles Planning and Zoning Code, sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. The various properties comprising the Project Site are primarily zoned C2-CSA1 (Commercial – Centers Study Area, Height District 1). The majority of Site 1 (i.e., 1317, 1321, 1329, and 1345 North Vermont Avenue) is zoned C2-CSA 1, and 1328 North New Hampshire Avenue is zoned R4-1 (Multiple Dwelling Zone, Height District 1). Sites 2, 3, and 5 are also zoned C2-CSA1. Site 4 is split zoned with the northern portion of the 1526 North Edgemont Avenue being zoned PB-1 (Parking Building) and the smaller southern portion zoned C2-CSA1. The entirety of Site 6 (4950 West Sunset Boulevard) is zoned RD2-1XL (Restricted Density Multiple Dwelling Zone, Height District 1XL). Zoning as it applies to the various properties included within the Project Site, as well as in the immediate surrounded area, is illustrated on Figure II-7, Zoning.

According to the LAMC, development on commercially zoned properties with a Height District 1 designation (including C2-CSA1) have no identified maximum height, but have a FAR of 1.5:1.¹² Development on properties zoned R4 with a Height District 1 designation (R4-1) have no identified maximum height, but have a FAR of 3:1. Development within the PB zone and Height District 1 (PB-1) has a maximum permitted height of two stories.

¹¹ City of Los Angeles, Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan), Section 2, Purpose (Items G, H, and O), March 2001.

¹² City of Los Angeles, Los Angeles Municipal Code, 2020.

Lastly, development within the RD2 zone and 1XL Height District has a maximum permitted height of 30 feet and two stories.

(i) *Lighting Regulations*

Lighting is regulated by various chapters in the LAMC. The LAMC sections applicable to the Project include the following:

- Chapter 1, Article 2, Section 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view. A discussion regarding the proposed Project's compliance with the lighting regulations listed above is included below Section 4 (a) (ii).

(ii) *Street Tree Replacement and Planting In-Lieu Fee*

LAMC Section 62.177 establishes the in-lieu fee to cover the cost to procure, plant, and provide water for 3 years for each tree required pursuant to a Development Tree Planting Requirement or a Public Works Tree Planting Requirement, when the required tree cannot feasibly be planted on site. The in-lieu fee under Section 62.177 is as follows:

- In-Lieu Fee – Development Tree Planting Requirement: \$2,612 per tree.
- In-Lieu Fee – Public Works Tree Planting Requirement: \$1,945 per tree.

Upon the approval by the Board of Public Works, including a determination by the Board of the Public Works that the site cannot feasibly accommodate a required tree, the in-lieu fee established in Subsection (b) may be used to satisfy a Public Works Tree Planting Requirement for the Project.

(iii) *Tree and Shrub Preservation Ordinance No. 186873*

In accordance with Ordinance No. 186873, all existing protected street trees and shrubs and relocation and replacement trees and shrubs must be indicated on a plot plan attached to the building permit. Further, the protected trees and shrubs must be identified and described by map and documentation as required by the Advisory Agency. No protected tree or shrub may be relocated or removed except if the City's Chief Forester determines that the removal of the tree or shrub has been approved by the Advisory Agency; removal of the protected tree or shrub has been approved by the Planning Commission, City Council, Zoning Administrator or Area Planning Commission; or doing so is not prohibited by an issued building permit. Also, while not expressly described in No. 186873, the removal of street trees, protected trees, and trees associated with a land development proposal in the City is subject to a Tree Removal Permit from the Department of Public Works Bureau of Street Services.

Protected Trees include the following:

- Oak tree including valley oak, California live oak, and other oak tree indigenous to California but excluding scrub oak
- Southern California black walnut
- Western sycamore
- California bay

Protected Shrubs include the following:

- Mexican Elderberry
- Toyon

Also, to be considered protected, the Southern California indigenous tree or shrub species listed above must measure four inches or more in cumulative diameter (trees and shrubs), four and one-half feet above the ground level at the base of a tree or shrub.

The Project Site contains one Southern California native tree species, a coast live oak (*Quercus agrifolia*), located east of Site 4, which is considered a "protected tree" per the

City's Protected Tree Ordinance. This tree is not planned for removal and would remain in place. In addition, 114 existing street trees are in the City right-of-way (ROW). Therefore, the Project Site contains 1 City-protected tree, 114 street trees, and 209 non-protected trees (total of 324 trees). No protected shrubs are located on the Project Site (Appendix C). Of the 324 trees located on the Project Site, approximately 89 trees would require removal, and the remaining 235 trees would be preserved in place. The 89 trees requiring removal include 72 privately owned trees (i.e., trees located on site) and 17 trees within the City ROW (see Appendix C). None of the trees within the City's ROW are native to California, and all 69 on-site trees to be removed are non-protected species.

Please refer to the Project Arborist Report (Appendix C) and Chapter IV.C, Biological Resources, of this Draft EIR for an analysis of compliance with the City's Tree Preservation Ordinance. Necessary construction protection measures and mitigation for tree removal are also discussed in Appendix C and Chapter IV.C.

b) Existing Conditions

(1) Scenic Resources

(a) Scenic Vistas

A scenic vista is typically defined as a panoramic view or vista from an identified view/vista point, public road, public trails, public recreational areas, or scenic highways.¹³ The City of Los Angeles is largely urbanized; however, much of the Hollywood Community Plan area is comprised of hillside and mountainous terrain.¹⁴ The six building sites that comprise the Project Site are located in an urban and developed area of the Community Plan area and are currently developed. As such, there are no natural features of substantial scenic value such as trees, topography, rock outcroppings, bodies of water, or native vegetation on the Project Site that are considered scenic.

However, locations providing scenic vistas are in the surrounding area. For example, Griffith Park is located approximately 1 mile north of the closest Site (Site 4) and provides various recreational and scenic trails from which long and broad views are available. The closest trail to the Project Site is the East Observatory Trail, located approximately 1.1 miles northwest of Site 4 in the southwestern corner of Griffith Park.¹⁵ The southerly portion of the trail straddles a relatively low southwest–northeast ridgeline prior to turning north and continuing towards the Griffith Observatory. The viewing decks and platforms of the Griffith Observatory also provide elevated vantage points from which long views to

¹³ Potential scenic views from private properties are not required by CEQA and not under consideration in this analysis.

¹⁴ City of Los Angeles, Hollywood Community Plan, pg. HO-2, December 13, 1988.

¹⁵ City of Los Angeles, Griffith Park, Trail Map_2010.

the south, west, and east are available. Located atop mounded terrain to the immediate northeast of Site 4, the western turf area of Barnsdall Art Park also provides opportunities for long, scenic views to the west and views to mountainous terrain to the north.

In addition, and more generally, scenic views associated with the Hollywood Community include views from the Hollywood Hills across the Hollywood Community. Due to the prominent elevation of the Hollywood Hills, available vistas encompass the Los Angeles Basin, including the downtown area. View resources within the Hollywood Community Plan area also include views of the Hollywood Hills from Hollywood's urban streets and parks. Views from streets, however, are generally narrow and intermittent due to the highly urbanized character of the Hollywood area including buildings that routinely block features located outside of the immediate area from view.

(b) Scenic Highways and Scenic Resources

California scenic highways and historic parkways are designated in Caltrans' California Scenic Highway Mapping System, while some local scenic highways are also designated in local plans. Scenic resources include, but are not limited to landforms, rock outcroppings, or historic buildings. The nearest officially designated State scenic highway, SR-27 (Topanga Canyon State Scenic Highway) is located over 16 miles to the west of the Project Site. The nearest eligible State scenic highway, I-210 from I-5 near Tunnel Station to Route 134, is located approximately 9 miles northeast of the Project Site. The nearest Historic Parkway segment of the Arroyo Seco Parkway (SR-110) is located approximately 3.4 miles to the southeast of the Project Site.

Regarding scenic resources, street trees and landscaping are present on the overall Project Site. In the surrounding area, the brick church building at the intersection of Sunset Boulevard and Alexandria Avenue, the Self-Realization Fellowship Hollywood Temple, and Barnsdall Art Park (including the Frank Lloyd Wright-designed Hollyhock House) are scenic resources. While these resources are considered scenic for the purposes of the scenic highway views assessment in the impact discussion below, none of the elements present on the Project Site or in the surrounding area are within a state scenic highway.

(2) Aesthetics/Visual Character

(a) Project Site

As shown in Figure II-4, Proposed Site Plan, the overall Project Site is comprised of six Sites at the following locations:

- Site 1: 1345 North Vermont Avenue; 1326/1328 North New Hampshire Avenue; 1317, 1321, and 1325 North Vermont Avenue; 1329/1331 North Vermont Avenue and 1337/1339 North Vermont Avenue
- Site 2: 4760 Sunset Boulevard, 1428 North L Ron Hubbard Way, and 1429 North New Hampshire Avenue
- Site 3: 1505 North Edgemont Street
- Site 4: 1526 North Edgemont Street
- Site 5: 1517 North Vermont Avenue
- Site 6: 4950 West Sunset Boulevard

A discussion of each building site is provided below. Photographs of existing structures and features on each building site and in the surrounding area were taken by Dudek during a site visit on October 8, 2020. The location and orientation of photos is depicted on **Figure IV.A-1**, Existing Conditions Photo Locations.

Site 1

Site 1 is currently developed with a total of four one-level commercial buildings located off North Vermont Avenue and a single one-level residence located off North New Hampshire Avenue. The currently fenced site is relatively flat and in addition to buildings, features two gated (and separated) parking lots with access off North Vermont Avenue. The commercial buildings display a square or rectangular form, have flat red tile or shingled and slightly pitched roofs, and are clad with blue gray stucco. Low concrete walls and thin metal fencing partially line the properties along their frontage of North Vermont Avenue. Photos of the property are included on **Figure IV.A-2**, Existing Conditions: Sites 1 and 2 (see Photos A and B).

The residential property (1328 North New Hampshire Avenue) features a one-level, white wood siding with forest green trim building with a detached garage. See Figure IV.A-2 (Photo C). The building is constructed with a rectangular floor plan and an angular wood-shingled roof. Four thin, vertical columns are located near the front entrance and extend from the porch to support an entrance overhang. Scattered shrubs and several mature trees are planted in the front yard that is surrounded by a low, white-picket fence.



SOURCE: Bing Maps 2018

FIGURE IV.A-1
Existing Conditions Photo Locations

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ABOVE: Photo A: View west from North Vermont Avenue to one-story commercial development on Site 1

BELOW: Photo B: View southwest from North Vermont Avenue to one-story commercial development and parking lot on Site 1



ABOVE: Photo C: View east from North New Hampshire Avenue to fenced/abandoned one-story residence on Site 1

BELOW: Photo D: View northeast from L Ron Hubbard Way to parking lot and hospital utility building on Site 2 (4760 Sunset Blvd)



FIGURE IV.A-2
Existing Conditions: Sites 1 and 2

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Site 2

Site 2 encompasses an existing, single-level utility building and surface parking lot. See Figure IV.A-2 (Photo D). The utility building and surface parking lot support an adjacent four- to five-level Kaiser Permanente medical office building (MOB). Mature trees, including palm and crape myrtle trees, are located along the northern and southern border of the parking lots. Several smaller trees are planted within parking lot islands.

As stated above, a modern, four- to five-level Kaiser Permanente healthcare facility is located to the immediate east of Site 2. Sunset Boulevard and L Ron Hubbard Way abut the site to the north and west, respectively. Sidewalks parallel both roads, and L Ron Hubbard Way has a distinct brick surface.

Site 3

Site 3 is entirely developed with a Kaiser Permanente MOB, an electrical/mechanical building, and a small slightly elevated surface parking area with a subterranean parking lot. The existing seven-level MOB is in the southeastern corner of the site. The development is rectangular in form and incorporates gray, white, and green concrete paneling and rows of glass windows along all elevations (see Photo E on **Figure IV.A-3**, Existing Conditions: Sites 3, 4, 5 and 6). While not visible in Photo E, a wide, secured driveway is located to the immediate west of the building off Sunset Boulevard and a small surface parking area is located to the north. A small, one-level electrical/mechanical building is located to the west of the gated driveway and includes concrete masonry walls along the south, west, and north façades, and metal vents along the east façade.

Site 4

Approximately 2.8-acres in size, Site 4 is fully developed with a Kaiser Permanente MOB. The existing MOB is eight levels high, with the northern portion of the building extending to approximately nine levels. At the high point (i.e., top of penthouse parapet), the MOB is approximately 491 feet above mean sea level or approximately 99 feet high, assuming an adjacent ground level of 392 feet.¹⁶ The structure consists of beige concrete panels on each level, as well as horizontal cream panels that extend around the bottom of each level across the west façade. The north façade displays gray and white concrete, and the west façade includes rectangular overhangs at each level with mesh-like window screens. A gray, L-shaped concrete “tower” structure with no windows is featured along the south façade of the building. A small dark green wall exposed by the L-shaped concrete structure on the building’s south façade features a rectangular advertisement panel (see

¹⁶ C.W. Mayhew, and H. L. Thiederman, Architects, Inc., Exterior Elevations for 5 Story Clinic Addition Kaiser Foundation Hospitals, 1526 Edgemont Street, Los Angeles, CA, 1971.

Photo F on Figure IV.A-3). An elevated pedestrian bridge extends from the northwestern corner on the west elevation of the MOB across North Edgemont Street to the five-level parking structure located immediately north of Site 3.

Site 5

Site 5 gently slopes towards the south and is developed with a parking structure. The parking structure is largely obstructed from the view of pedestrians and motorists on North Vermont Avenue by continuous beige stone and/or concrete masonry paneling at the ground level and metallic panels located on the second level of the structure (see Photo G on Figure IV.A-3). The metal panels only appear on the structure's frontage of North Vermont Avenue. The structure's concrete exterior fronting Barnsdall Avenue is marked by smooth, green, grey, and off-white painted expanses and rectangular cutouts covered with secured metallic grating (see Photo G). A rectangular billboard is located along the north façade of the structure, and the adjacent sidewalk is lined with regularly spaced street trees.

Site 6

Site 6 consists of a small surface parking lot and egress/ingress lanes for an adjacent, seven-level parking structure. A single-level temporary building is in the central-north portion of the site and separates parking structure ingress/egress lanes (see Photo H on Figure IV.A-3). The single-level wooden building is rectangular in shape and features a greyish exterior punctuated by a rectangular Kaiser Permanente sign on the west façade. Several windows are also located on the west façade. A 6-foot-high concrete masonry wall partially extends along the western boundary of the site before transitioning to a secured metal fence. Both wall and fence parallel North Alexandria Avenue. Low shrubs and two mature trees are located along the adjacent sidewalk, and vines climb the street-facing side of the wall. A few additional mature trees are scattered along the southern boundary of the site, along with several metal storage containers and refuse bins.

(b) Surrounding Area

Existing uses and development surrounding the Project Site are depicted on **Figures IV.A-4 through IV.A-6**, Existing Conditions: Surrounding Area (1 of 3, 2 of 3, and 3 of 3). The locations of the photographs depicted on Figures IV.A-4 through IV.A-6 is shown on Figure IV.A-1.

Site 1 is generally bound by North Vermont Avenue and the Hollywood Presbyterian Medical Center to the east, a small commercial strip mall and drive-thru fast-food restaurant (and parking lot) to the south, New Hampshire Avenue and residences to the west, and a two-level motel/motor lodge to the north. Multistory buildings on the Hollywood Presbyterian Medical Center campus, including a 10-level tower, are shown on Figure IV.A-4 (see Photo 1). The campus is located less than 100 feet to the east of Site 1.



ABOVE: Photo E: View north to six-story medical office building on Site 3 (1505 North Edgemont Street)

BELOW: Photo F: View northeast from Sunset Blvd to seven-story medical office building and parking lot on Site 4 (1526 North Edgemont St)



ABOVE: Photo G: View southwest from Bamsdall Avenue to three-story parking structure on Site 5 (1517 North Vermont Blvd)

BELOW: Photo H: View northeast from North Alexandria Avenue to parking lot and one-story temporary building on Site 6 (4950 North Alexandria Ave)



FIGURE IV.A-3
Existing Conditions: Sites 3, 4, 5 and 6

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ABOVE: Photo 1: View east from North Vermont Avenue to Hollywood Presbyterian Medical Center

BELOW: Photo 2: View east from Sunset Boulevard/North Vermont Avenue to Children's Hospital LA campus



ABOVE: Photo 3: View northwest from Sunset Boulevard/North Vermont Avenue to Medical Office Building (approx. 140' high)

BELOW: Photo 4: View north from Maubert Avenue to one-story commercial building



FIGURE IV.A-4
Existing Conditions: Surrounding Area (1 of 3)

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ABOVE: Photo 5: View northwest from Sunset Boulevard to Medical Office and Research Buildings

BELOW: Photo 6: View southwest from Sunset Boulevard to Medical Office Building (4760 Sunset)



ABOVE: Photo 7: View south from parking lot to Church of Scientology Facility

BELOW: Photo 8: View southeast from Sunset Boulevard to Self-Realization Fellowship Facility



FIGURE I.V.A-5
Existing Conditions: Surrounding Area (2 of 3)

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ABOVE: Photo 9: View west from Barnsdall Park to Medical Office Buildings and Parking Structures

BELOW: Photo 10: View northeast from North Edgemont Street to Medical Office Building



ABOVE: Photo 11: View west from Sunset Boulevard to Commercial Office Building

BELOW: Photo 12: View northeast from Sunset Boulevard to brick Church Facility



FIGURE IV.A-6
Existing Conditions: Surrounding Area (3 of 3)

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North of Site 1 and to the east and west of North Vermont Avenue, tall hospital and MOB developments feature prominently along Sunset Boulevard. For example, the green stucco, glass, and brick buildings (five to seven levels) of the Children's Hospital Los Angeles campus occupy the southeastern corner of the North Vermont Avenue and Sunset Boulevard intersection (see Photo 2, Figure IV.A-4), and a hospital skybridge and grey medical office building are present further east along the corridor. The tubular steel and glass, domed Metro Station structure is also located at the intersection but is easily overlooked due to the scale and bulk of hospital buildings. A nine-level MOB (Kaiser Permanente) is located at the northwestern corner of the North Vermont Avenue and Sunset Boulevard intersection and abuts Site 5 (see Photo 3, Figure IV.A-4). North of Barnsdall Avenue and Site 5, the scale of development is substantially reduced, and the local landscape supports one- and two-level commercial and retail development and a small row of two-level residences. A representative one-level commercial building is shown in Photo 4 (see Figure IV.A-4; this structure is located approximately 130 feet to the northwest of Site 5).

West of North Vermont Avenue, the Sunset Boulevard corridor is primarily lined by multistory medical office development. Most of these buildings are Kaiser Permanente offices/facilities. Photos 5 and 6 of Figure IV.A-5 illustrate the architectural character of office building development along the corridor with notable elements including metal and composite panels, curved and green-tinted glass, and curved and frosted glass. The three-level, partially curved MOB depicted in Photo 6 is immediately adjacent to Site 2. While the character of the Sunset Boulevard corridor between North Vermont Avenue on the east and North Edgemont Street on the west is largely driven by MOB and related development, churches and spiritual facilities also contribute to the visual landscape. For example, the Church of Scientology facilities occupy an entire city block and cast a distinct "look" to the corridor due to the main structure's royal blue exterior featuring intricately carved upper panels on the street facing façade (see Figure IV.A-5, Photo 7). Though setback from Sunset Boulevard and buffered from the corridor by surface parking, the church facility is distinct and contrasts with the predominant medical office and hospital development along Sunset Boulevard in the Project area. Lastly, and though vastly smaller in size, the Self-Realization Fellowship Hollywood Temple similarly contributes a unique aesthetic to the Sunset Boulevard corridor. As shown on Figure IV-5, the temple is characterized by tall white stucco exterior walls with arched and rectangular openings, blue tile accents, and a series of metallic gold domes at corners and above the visible facility entrance off Sunset Boulevard. In addition to these exterior structures, the facility includes small, one-level residential buildings/apartments along the North Catalina Street frontage, and various one- and two-level structures around the site perimeter. Though not depicted on Figure IV.A-5, residential and smaller scale commercial uses also occur south of Sunset Boulevard, to the east of L Rob Hubbard Way and to the west of North Catalina Street.

In addition to the Self-Realization Fellowship Hollywood Temple located to the south across Sunset Boulevard, the area immediately surrounding Sites 3 and 4 is developed with medical and commercial office buildings, parking structures, residential uses, a house of worship, and Barnsdall Art Park. Kaiser Permanente facilities located to the west of Barnsdall Art Park and a mounded landscape park home to the Frank Lloyd Wright-designed Hollyhock House, are depicted in Photos 9 and 10 of Figure IV.A-6. Beyond the Kaiser Permanente parking and utility building visible in the foreground of Photo 10 is an elevated, three-level apartment building. Additional residential buildings (two to four levels high) are located to the north of the Photo 10 location. Lastly, glass office development, a two-level brick church, and representative one-level commercial retail development occurring along the Sunset Boulevard corridor are depicted on Photos 11 and 12 of Figure IV.A-6.

(3) Light/Glare

For the purposes of this analysis, light refers to artificial light sources associated with the Project that could affect the visual environment. There are two types of artificial, or man-made, light sources: (1) point sources (e.g., illuminated signage, street light poles, vehicle headlights) and (2) indirect sources that reflect light onto adjacent properties (e.g., reflective or light-colored surfaces).

The Project Site is in an urbanized area that features a mix of healthcare, residential, office, public, and commercial uses, as well as parking garages/structures and surface parking lots. Interior lighting emanating from existing structures and buildings are common sources of nighttime lighting in the Project area. Pole-mounted overhead streetlights are installed along North Vermont Avenue, Sunset Avenue, L Ron Hubbard Way, North Edgemont Avenue, North Alexandria Boulevard, and other local roads surrounding the Project Site and contribute to the local nighttime environment. Other sources of lighting in the area include light from traffic signals, lighting installed at or near building entrances, surface parking lot lights, and lighting from parking garages.

In addition to the lighting sources described above, building materials are a potential source of glare in the Project area during daytime hours. Specifically, glass windows and exposed metal features in local area healthcare buildings are sources of potential daytime glare in the Project area.

3. Project Impacts

a) Thresholds of Significance

Except as provided in California PRC Section 21099 and in accordance with the State CEQA Guidelines Appendix G (Appendix G Thresholds), the Project would have a significant impact related to aesthetics if it would:

Threshold (a): *Have a substantial adverse effect on a scenic vista;*

Threshold (b): *Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a state-designated scenic highway;*

Threshold (c): *(In non-urbanized 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 a 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?); or*

Threshold (d): *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.*

This analysis relies on the Appendix G Thresholds. The analysis uses the following factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

(1) Aesthetics

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;
- The degree of contrast between proposed features and existing aesthetic value; and
- The degree to which the project would contribute to the area's aesthetic value.

- Applicable guidelines and regulations.

(a) *Obstruction of Views*

- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

(b) *Applicable Zoning and Other Regulations Addressing Scenic Quality*

- Project compliance or consistency with such applicable guidelines and/or regulations.

(c) *Nighttime Illumination*

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

b) Methodology

As previously discussed, because the Project meets the criteria set forth under SB 743 for an employment center project on an infill site within a TPA, California PRC Section 21099(d)(1) and ZI No. 2452 provide that aesthetic impacts associated with the Project shall not be considered significant impacts on the environment. Therefore, evaluation of the Project's physical impacts associated with aesthetics is not required and is provided in this EIR for informational purposes only.

(1) Scenic Vistas

A scenic vista generally provides focal views of objects, settings, or features of visual interest, or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantage points. A

significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista.

The assessment of impacts to scenic vista focuses on the anticipated changes to existing views that may result from development of the Project. The intent of the analysis is to determine if scenic views and resources are available in the Project area and whether those views and/or resources would be blocked, obstructed, or substantially interrupted by the Project. In general, views are closely tied to topography and distance from a scenic resource and the presence of intervening features (i.e., development or landscaping) that might block the scenic resource from view. Scenic vistas and views were identified through field surveys, photographic documents, topographic analysis, and review of Google Earth imagery. The analysis is based on the characteristics of Project development (primarily mass and scale) and comparisons to the characteristics of existing on-site buildings. In addition, the analysis of potential scenic vista impacts as experienced from Barnsdall Art Park is aided by a view study prepared in 2019 by P+W Architecture. The view study consisted of evaluating existing views available from five discrete vantage points at the Hollyhock House and Barnsdall Art Center and three-dimensional representations of the approximate building envelopes of proposed development on the Project Site. The intent of the view study is to illustrate potential effects to existing available views associated with the mass and scale of proposed development.

To determine whether a potential view impact would occur, the following process is used:

- Determine whether scenic vistas or views are available in the surrounding area.
- Identify the potential obstruction of valued public vistas and views due to development of the Project.
- Evaluate whether the Project would substantially alter or interrupt the view such as through the addition of incompatible visual elements. Substantial alteration and/or interruption of views is subjective and dependent on several factors including presence of a valued view resource, noticeable blockage of the resource, and whether the blockage would be experienced from a public vantage point.
- Duration of the view blockage (i.e., permanent or temporary) and location from which the blockage is experienced (i.e., stationary or mobile)

As discussed above, scenic vista impacts associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

(2) Scenic Resources

Like scenic vistas, the assessment of impacts to scenic resources within a State scenic highway is informed by alteration of existing scenic resources (including but not limited to trees, rock outcroppings, and historic buildings) and the visibility of Project changes as experienced from a State scenic highway (officially designated and eligible) or historic parkway. As further illustrated in the analysis below, the nearest State scenic highways and historic parkway to the Project Site are identified, and visibility of the Project is evaluated based on several factors including distance from the nearest State scenic highway (and historic parkway) and the presence of intervening features that would block or obstruct Project alterations from view. If a project would not be visible from a State scenic highway (or historic parkway), then no impacts to scenic resources within a State scenic highway or historic parkway would occur.

As discussed above, scenic resources impacts associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

(3) Conflicts with Regulations Governing Scenic Quality

The Project Site is in urbanized Los Angeles. As such, and in accordance with threshold I.c. of State CEQA Guidelines Appendix G, the analysis focuses on whether the Project would conflict with scenic quality regulations. The determination of conflicts with applicable regulations governing scenic quality is based on a description of Project characteristics (and similarities with existing development) and review of previously identified planning documents pertaining to scenic quality. These include the Framework Element, the Hollywood Community Plan, the SNAP, and the LAMC, each of which are summarized above and more fully addressed and analyzed in Section IV, Land Use and Planning, of this Draft EIR. State CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered in conformance if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*,¹⁷ State law does not require an exact match between a project and the applicable general plan. Rather, “consistency” suggests compatibility with the objectives, policies, general land uses, and program specified in the plan. To clarify, a project must be in agreement or harmony with the applicable land use plan to be consistent with that plan. As discussed above, scenic quality impacts associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

¹⁷ *Sequoyah Hills Homeowners Association v. City of Oakland*, November 30, 1993.

(4) Light and Glare

The light and glare analysis identifies the existing light and glare environments in the Project area, the light- and glare-sensitive land uses in the area, describes the light and glare sources under the Project, and qualitatively evaluates whether the Project would result in a substantial increase in the Project's temporary and permanent light and glare sources and the extent to which Project lighting may spill off Sites 1 through 6 and onto adjacent areas including light-sensitive uses. As discussed above, light and glare impacts associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

c) Project Design Features

The following project design features (PDFs) will be incorporated into the Project:

(1) Construction

PDF-AES-1: Construction and operational lighting, including vehicle headlights within new parking structures, will be shielded and/or directed downward (or on the specific on-site feature to be lit) in such a manner as to preclude light pollution or light trespass onto adjacent uses that would cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors of existing and anticipated future adjacent uses.

PDF-AES-2: Where Project construction is visible from pedestrian locations adjacent to the Project Site, temporary construction fencing will be placed along the periphery of all Building Sites to screen construction activity from view at the street level. For Building Sites located near the Metro stations (Site 1 and Site 5), wooden construction fencing shall be installed at the boundary of the areas with public access. Pursuant to the Metropolitan Transportation Authority (Metro) Adjacent Construction Design Manual¹⁸, fencing would be at least 8 feet high and meet all applicable code requirements.

PDF-AES-3: Kaiser Permanente will ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling

¹⁸ Metropolitan Transportation Authority Design Criteria and Standards, Adjacent Construction Design Manual, November 2, 2018.

postings and of uniform paint color or graphic treatment) throughout the construction period.

(2) Operation

PDF-AES-4: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the California Energy Code requirements shall be permitted.

d) Analysis of Project Impacts

Threshold (a): Would the Project have a substantial adverse effect on a scenic vista?

Although the City of Los Angeles is largely urbanized, much of the Hollywood Community Plan area is comprised of hillside and mountainous terrain.¹⁹ While there are generally no natural features of substantial scenic value, such as stands of natural trees, rugged or prominent terrain, rock outcroppings, or natural bodies of water, hillsides and mountainous terrain in the surrounding area comprise scenic vistas offering long and wide views of the City. Further, Barnsdall Art Park is located atop elevated terrain to the northeast and northwest of Sites 4 and 5 (and other existing Kaiser Permanente facilities) and offers opportunities for occasionally long views of the surrounding landscape. As described in Section Vi.A.2(b) above, ridgeline and hillside trails in Griffith Park, the Griffith Observatory, and Barnsdall Art Park provide opportunities for particularly long views, and therefore, views from these areas/facilities are considered scenic vistas for purposes of this analysis.

(1) Construction

The demolition of existing development on, and proposed redevelopment of, the Project Site would likely be visible from identified scenic vistas in the surrounding area. Specifically, demolition and redevelopment activities may be visible from trails and other prominent vantage points in Griffith Park and from Barnsdall Art Park. While visible, demolition and redevelopment would not directly impact existing scenic resources in the Project area as viewed from identified scenic vistas. Specifically, construction activities would not substantially affect views of the Los Angeles Basin available from the Griffith Park area, views of the highly urbanized Hollywood Community and Hollywood Hills from Barnsdall Art Park, or intermittent views of the Hollywood Hills from urban streets near the Project Site. Due to the presence of existing development on the Project Site and/or the scale of multistory development nearby that tend to block views across Sites 1 through 6 from urban streets,

¹⁹ City of Los Angeles, Hollywood Community Plan, Page HO-2, December 13, 1988.

later stages of proposed multistory development would not block or substantially affect an existing clear view of the Hollywood Hills. Existing views of the Hollywood Hills along north–south street corridors would largely be maintained. For a similar reason, demolition and redevelopment activities of the Project would not substantially block or otherwise affect views of the Los Angeles Basin available from Griffith Park and Barnsdall Art Park. Cranes and other appurtenances operating on Sites 1 through 6 during redevelopment would be visible, yet these features would not result in substantial view blockage to scenic resources from public streets and from elevated vantage points, and public views of the Los Angeles Basin, Hollywood Community, and Hollywood Hills would continue to be available. Furthermore, because demolition and redevelopment activities are temporary in nature, such activities would not result in a substantial adverse effect on a scenic vista. Lastly and as discussed above, scenic vista impacts (including those associated with demolition and redevelopment) associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

(2) Operation

Table IV.A-1 lists the type and heights of existing and proposed development on Sites 1 through 6. This information is provided to inform the analysis of potential effects to scenic vistas from identified public vantage points in the surrounding area. Where applicable, specific Building Sites are referenced in the assessment below Table IV.A-1.

**TABLE IV.A-1
PROJECT SUMMARY TABLE**

Existing Uses to be Removed	Proposed Construction
Site 1 (1345 North Vermont Avenue; 1326/1328 North New Hampshire Avenue; 1317, 1321, and 1325 North Vermont Avenue; 1329/1331 North Vermont Avenue; and 1337/1339 North Vermont Avenue): New MOB and Parking Structure	
<ul style="list-style-type: none"> • 15,113 sf of one- or two-level commercial and residential structures (5 structures in total) • Surface parking lots with 47 parking spaces 	<ul style="list-style-type: none"> • MOB (130,000 sf) • 562-stall parking structure (302,800 sf) • 129 feet in height (13 levels; 9 above grade, 4 below grade)
Site 2 (4760 Sunset Boulevard; 1428 North L Ron Hubbard Way; 1429 North New Hampshire Avenue): Procedure Center Addition	
<ul style="list-style-type: none"> • 39 surface parking spaces 	<ul style="list-style-type: none"> • 50,000-sf Procedure Center addition to an existing MOB at 4760 Sunset Boulevard (for a total of 110,000 sf of medical office space at this property); 6 parking spaces to remain • 80 feet in height (4 levels)
Site 3 (1505 North Edgemont Street): Demolition of an Existing MOB and Redevelopment of a MOB	
<ul style="list-style-type: none"> • 79,356-sf MOB and 15,077-sf parking area with 47 parking spaces (surface and below ground) 	<p>Option A</p> <ul style="list-style-type: none"> • 41,500-sf MOB

**TABLE IV.A-1
PROJECT SUMMARY TABLE**

Existing Uses to be Removed	Proposed Construction
<ul style="list-style-type: none"> 103 feet in height (7 levels) 	<ul style="list-style-type: none"> 70 feet in height (3 levels) <p>Option B</p> <ul style="list-style-type: none"> 73,500-sf MOB 90 feet in height (5 levels)
Site 4 (1526 North Edgemont Street): Demolition of an Existing MOB and Redevelopment of a MOB	
<ul style="list-style-type: none"> 120,557-sf MOB 105 feet in height (8 levels) 	<p>Option A</p> <ul style="list-style-type: none"> 177,300-sf MOB 105 feet in height (6 levels, with 5 above grade, 1 below grade) <p>Option B</p> <ul style="list-style-type: none"> 177,300-sf, 105-bed hospital addition and bridge connections to existing hospital 100 feet in height (6 levels, with 5 above grade, 1 below grade)
Site 5 (1517 North Vermont Avenue): New MOB and Parking Structure	
<ul style="list-style-type: none"> 19,199-sf MOB space inside the parking structure and 114,736 sf of parking area with 186 spaces 4 levels (2 above grade, 2 below grade) 	<ul style="list-style-type: none"> 230,600-sf parking structure with 578 parking spaces 2,300 sf of ground floor retail/commercial space 105 feet in height (10 levels, with 8 above grade, 2 below grade)
Site 6 (4950 West Sunset Boulevard): Parking Structure Addition	
<ul style="list-style-type: none"> Existing surface parking area and temporary, single-level trailer at 4950 West Sunset Boulevard 	<ul style="list-style-type: none"> 241-stall parking structure addition to the 4950 Sunset Boulevard parking structure at 4950 West Sunset Boulevard (122,400 sf) 90 feet in height (9 levels)

SOURCE: Kaiser Permanente

NOTES: MOB = medical office building; sf = square feet/square-foot. The numbers in this table are approximates and have been rounded.

Except for redevelopment of Sites 3 and 4, proposed redevelopment would result in increased building height compared to existing conditions. As shown in Table IV.A-1 above, future redevelopment of Sites 3 and 4 would result in the development of similar or reduced building height as compared to existing conditions. Redevelopment of Site 5 would result in an additional six levels of above-grade development compared to the existing two aboveground-level parking structure on site; however, the future MOB and parking structure development on the site would be located to the immediate north of an existing 140-foot-tall Kaiser Permanente building.

(a) *Views from Griffith Park Area*

Panoramic (i.e., wide) views of the urban, developed City including the highly urbanized Hollywood community are available at the highest points of trails within Griffith Park. In southerly views from lower segments of the trails, Sites 1 through 6 may be obstructed or partially screened by terrain and intervening elements, such as trees. Where views to Sites 1 through 6 are available from trails and the Griffith Observatory, nearby development in urbanized Hollywood includes buildings of comparable scale and mass as the proposed Project are also visible. The presence of existing development of comparable scale and mass substantially reduces the likelihood for significant impacts to long views available from the Griffith Park area. For example, redevelopment of Site 5 with an up to 105-foot-tall, 177,300-square-foot MOB would be visible from the Boy Scout Trail (high point approximately 1,017 feet; located 1.3 miles to the northwest), Griffith Observatory (1,130 feet above mean sea level at viewing platform; located 1.4 miles to the northwest), and Mount Hollywood (1,615 feet above mean sea level; located 2.1 miles to the northwest), respectively. However, the new MOB would be located to the immediate north of an existing 140-foot-tall building and as such, existing views to the Los Angeles Basin from these elevated vantage points would not be substantially impacted. See **Figures IV.A-7 through IV.A-9**. Similarly, redevelopment of Sites 3 and 4 would result in MOB's of similar or less height than the existing MOB's currently located on the sites. Therefore, redevelopment of Sites 3 and 4 would not substantially impact existing views from the Griffith Park area.

Redevelopment of Site 1 would result in a new nine-level MOB and parking structure (approximately 129 feet tall) that would be over 100 feet taller than existing low-profile development on the site. While the new MOB would be visible from Griffith Park area public vantage points, the building would be situated over 500 feet lower in elevation than trails and the Griffith Observatory. Thus, the new building would not result in view obstruction as the wider Los Angeles basin would remain visible from elevated public vantage points. In addition, Site 1 is also over 1.4 miles from the Boy Scout Trail high point and would be viewed in line with the new 105-foot-tall MOB on Site 5, an adjacent existing seven-level parking structure off Barnsdall Avenue, and the existing 140-foot-tall MOB at 1515 Vermont Avenue. An existing view from the Boy Scout Trail with callouts for Barnsdall Art Park, Sites 4 and 5, and development at 1515 North Edgemont is provided on Figure IV.A-7. As such, development associated with the proposed Project would be consistent with bulk and scale of nearby structures and would not result in the introduction of an incompatible visual element as viewed from the Griffith Park area.

Redevelopment of Sites 4 and 6 would result in introduction of new buildings (80 feet tall and 90 feet tall, respectively) where surface parking lots are currently located. Like other properties within the Project Site, redevelopment of Sites 4 and 6 may be visible from public vantage points in the Griffith Park area. However, due to the available wide views

of the Hollywood community and Los Angeles Basin, the construction of 80- and 90-foot-tall buildings along a highly urbanized corridor featuring multiple buildings of similar or greater height would not result in incompatible visual elements. Further, due to distance and differences in elevation, redevelopment of Sites 4 and 6 would not result view obstruction from public vantage points in Griffith Park, including the Boy Scout Trail, Griffith Observatory, or Mt Hollywood Trail. See Figures IV.A-7 through IV.A-9.

In addition to the rationale provided above for redevelopment of Sites 1, 4, 5, and 6, scenic vista impacts (including those associated with redevelopment of Sites 1 through 6 as viewed from the Griffith Park area) associated with an employment center project on an infill site within a TPA are not considered significant under California PRC Section 20199(b)(1) and ZI No. 2452.

(i) Views from Barnsdall Art Park

The western turf area at Barnsdall Art Park, and roof, patio, and other outdoor areas along the south-facing elevation of Hollyhock House, provide opportunities for long (albeit narrow) views to the west and southeast. Under existing conditions, long southwesterly views are also available; however, they are partially obstructed by existing park landscaping (e.g., tall trees), and by existing 8-level (105-foot-tall) MOB development on Site 4 (175 feet away from Barnsdall Art Park), 87-foot-tall MOB development on Site 3 (450 feet away from Barnsdall Art Park), and by a parking structure (approximately 50 feet tall) and utility building (approximately 75 feet tall) located to the north of Sites 3 and 4. Views from Barnsdall Art Park to the south are generally obstructed by hospital development (approximately 130 feet tall) at 4867 Sunset Boulevard Sunset. The hospital is located approximately 90 feet to the south of Barnsdall Art Park. Existing development along the Sunset Boulevard corridor that affects the availability of unobstructed views to the southwest, south, and southeast is depicted on **Figure IV.A-10**, Barnsdall Art Park and Height of Nearby Existing Development along the Sunset Boulevard Corridor. In addition, heights of existing and proposed development on the Sites is listed in Table IV.A-1.

To demonstrate anticipated Project effects to views from Barnsdall Art Park (specifically, from Hollyhock House and the Administration Building), P+W Architecture prepared a view study that conceptually illustrates the massing and scale of proposed building envelopes on Sites 4 and 5. The view study imagery is included as **Figure IV.A-11**, Views to the Southwest from Hollyhock House, and **Figure IV.A-12**, Views to the Southeast from Hollyhock House and Barnsdall Art Park Administration Building. It should be noted that while the Hollyhock House is available for self-guided and docent led tours, views from the Administration Building are not available to the public, and thus Figure IV.A-12 is provided for information purposes only.



1515 North Edgemont
(140 foot-tall MOB)

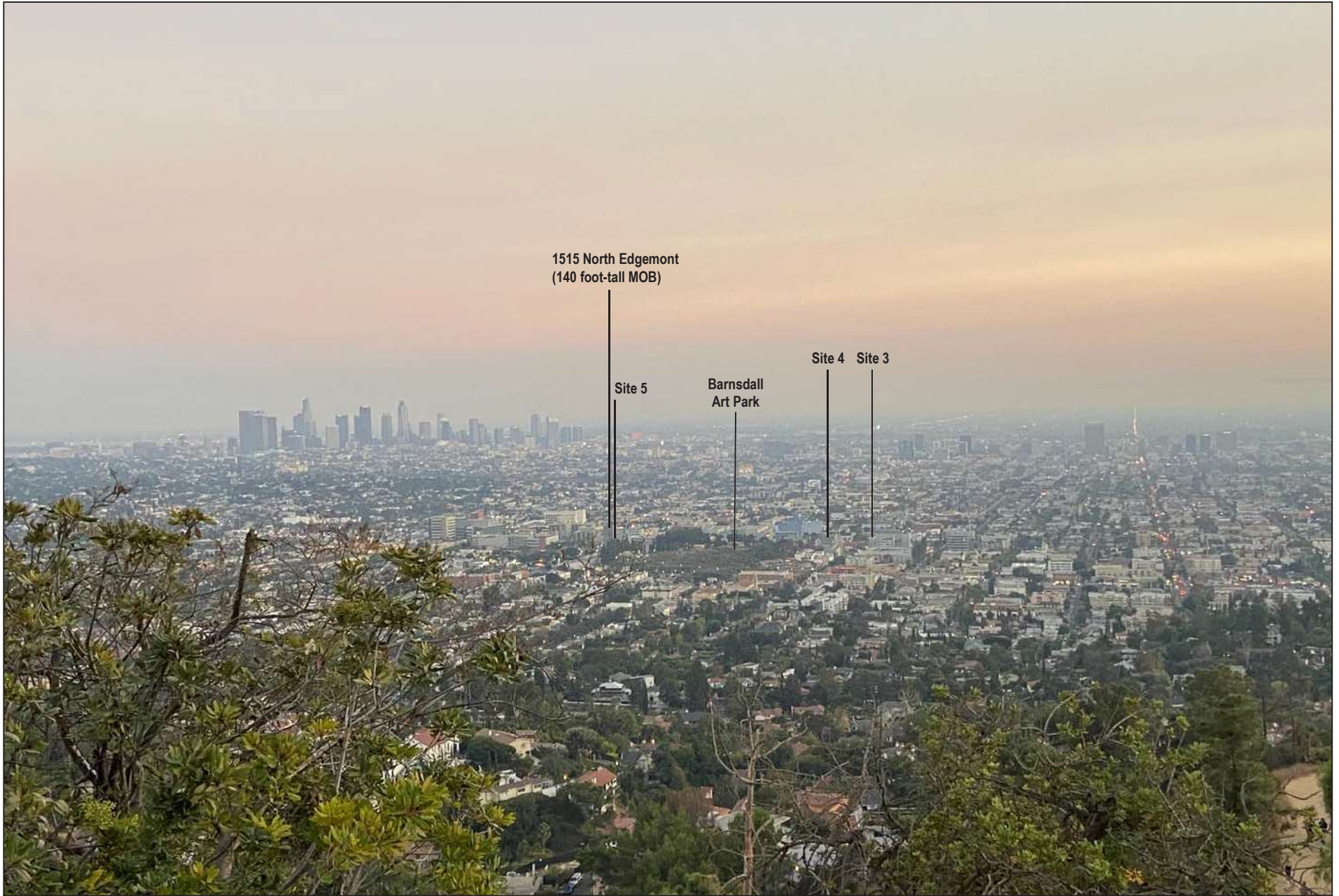
Site 5

Barnsdall
Art Park

Site 4

FIGURE IV.A-7
View from Boy Scout Trail towards Project Site

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1515 North Edgemont
(140 foot-tall MOB)

Site 5

Barnsdall
Art Park

Site 4 Site 3

FIGURE IV.A-8
View from Griffith Observatory towards Project Site

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FIGURE IV.A-9
View from Mount Hollywood Trail towards Project Site

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SOURCE: Bing Maps 2018

FIGURE I.V.A-10

Barnsdall Art Park and Height of Nearby Existing Development along the Sunset Boulevard Corridor

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ABOVE: View southwest from yard below patio (without trees)

BELOW: View southwest from living room roof (without trees)



ABOVE: View southwest from library roof (without trees)

FIGURE IV.A-11
Views to the Southwest from Hollyhock House

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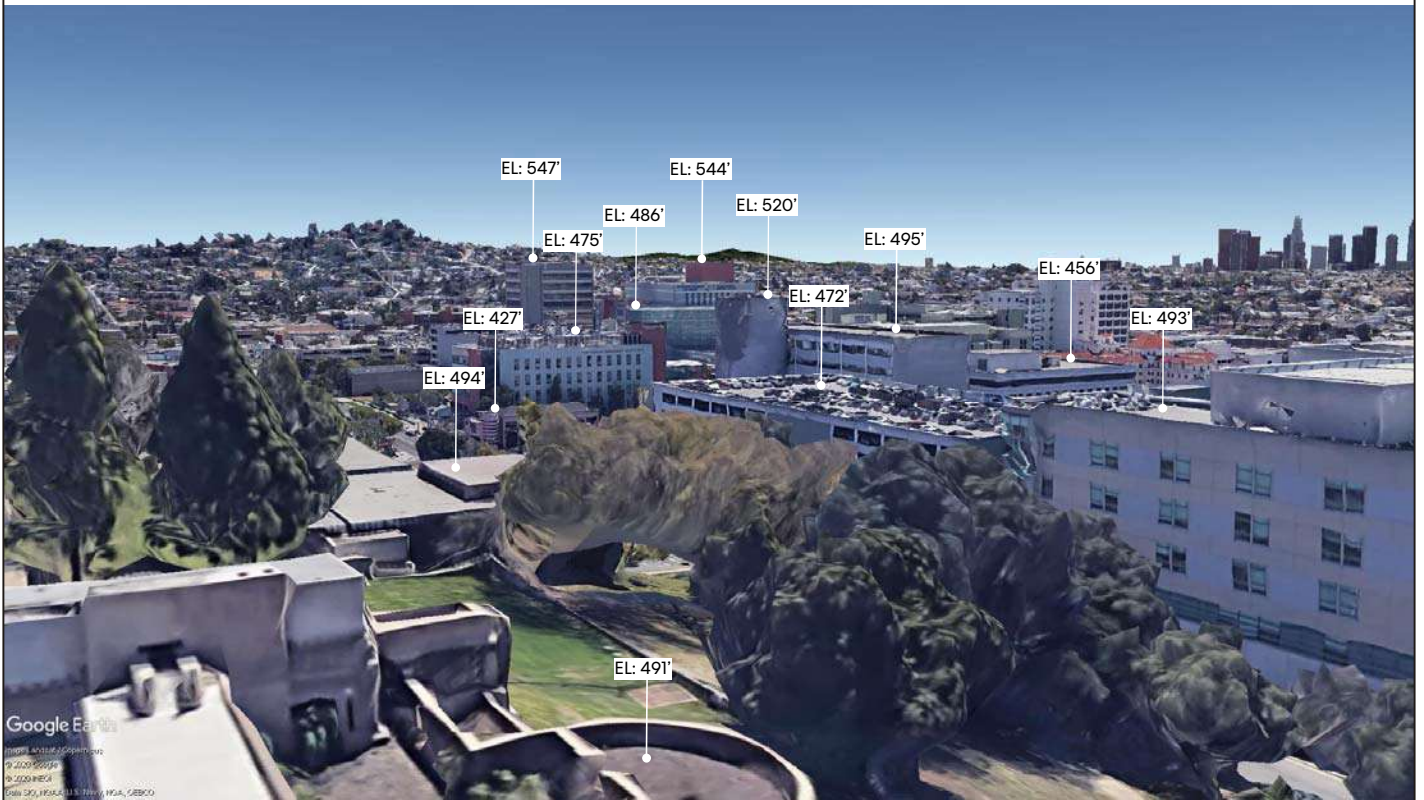
ABOVE: View southeast from roof of Hollyhock House master bedroom (without trees)



ABOVE: View southeast from admin building balcony (without trees)

FIGURE IV.A-12
Views to the Southeast from Hollyhock House and Barnsdall Art Park Administration Building

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Existing Conditions



Proposed Conditions (Site 5 Building Envelop Depicted)

FIGURE IV.A-12A
Google Earth View Above Hollyhock to the Southeast

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As shown on Figure IV.A-11, existing scenic views from southwest-facing outdoor areas of the Hollyhock House are generally narrow (i.e., available through gaps in trees or development) due to the presence of tall landscaping trees and existing development in the immediate surrounding area. Figure IV.A-11 also demonstrates the approximate massing and scale of the redevelopment of Site 4 (1526 Edgemont Street) with a 105-foot-tall MOB. As shown in the figure, redevelopment of Site 4 would not substantially affect the quality or length of the existing southwesterly view from Hollyhock House. Further, the 105-foot-tall MOB would not result in incompatible visual features as nearby development consists of medical office and hospital development of similar scale and mass. Also, redevelopment of Site 3 would be visible from the Hollyhock House yard (see Figure IV.A-11, View A). However, since the existing MOB at Site 3 is 87 feet tall, and redevelopment would entail a new, up to 90-foot-tall MOB, views from the yard area at Hollyhock House would not be substantially altered (i.e., redevelopment would result in a similar building profile as viewed from Hollyhock House). Lastly, due to the presence of existing tall development to the southwest, redevelopment of Site 6 would not be visible from the yard and library roof and if visible, would not result in view obstruction or substantial view alteration as experienced from the living room roof.

The quality of existing views to the southeast from the Hollyhock House master bedroom balcony and Barnsdall Art Park Administration Building balcony are illustrated on Figure IV.A-12. As demonstrated in the figure, available views are generally short in length due to park landscaping and nearby development; however, distant buildings are visible beyond existing parking structure development from the Administration Building balcony. See View E, Figure IV.A-12. The approximate massing and building envelope of redeveloped Site 5 is depicted on Figure IV.A-12 and demonstrates that the proposed parking structure (105 feet tall) at 1517 North Vermont Boulevard would not result in view obstruction or an incompatible visual feature. Rather, Site 5 redevelopment would be experienced as an extension of the existing parking structure to the immediate east of the site and would be partially blocked from view by existing park landscaping. From these locations, redevelopment of Site 2 would have limited visibility and would not result in substantial alteration of the existing views. Lastly, redevelopment of Site 1 with an approximate 130-foot-tall MOB would not be visible from these vantage points due the presence of existing hospital and MOB development (and park landscaping) that would screen the new development from view.

In summary, the proposed Project would not substantially obstruct or impede existing southwesterly, southerly, or southeasterly views from Hollyhock House or the Barnsdall Art Park Administration Building. Also, as no development is proposed to the immediate west of Barnsdall Art Park, the proposed Project would not affect existing long westerly views available from the Barnsdall Art Park. Thus, the proposed Project would not result in a substantial adverse effect on scenic vistas/views available from Barnsdall Art Park. Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, scenic

vista impacts of an employment center project located on an infill site within a TPA shall not be considered significant impacts on the environment.

(3) Mitigation Measures

This analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(4) Level of Significance after Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures were required, and the impact level remains not significant.

Threshold (b): Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a state-designated scenic highway?

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A of this Draft EIR), the Project Site is not located within a State or City-designated scenic highway. The closest component of a State scenic highway, SR-110 (a historic parkway), is located approximately 3.4 miles southeast of the Project Site.²⁰

As such, no impacts to scenic resources within a scenic highway would occur. Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts to scenic resources would not be considered significant.

Threshold (c): In non-urbanized areas, would the Project 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?

The proposed Project is in a highly urbanized area in the City of Los Angeles, and as such, the focus of this threshold is whether the Project would conflict with regulations that govern scenic quality. These principally include the applicable policies of the Hollywood Community Plan, aesthetic-related regulations set forth in the LAMC (e.g., street tree

²⁰ Caltrans, California Scenic Highway Mapping System—Los Angeles, 2018.

replacement, lighting and signage regulations), and applicable SNAP regulations (as amended by the proposed SNAP Amendment).

(1) Construction

Consistent with City Department of Public Works – Bureau of Street Services requirements, proposed removal of street trees would require a tree removal permit. As none of the trees that would be removed from the redevelopment sites during demolition or redevelopment are protected by the City, mitigation for tree removal approval is not required. However, landscape plans prepared for redevelopment of Sites 1 through 6 would include street and perimeter trees and understory plantings. For example, at Site 1 (1345 North Vermont Avenue) ; seven street trees (African sumac; 36-inch box) are proposed to be planted in the City’s ROW of North Vermont Avenue, and six perimeter trees (crape myrtle; 36-inch box) are proposed to be planted. At Site 2, removal of street trees is not proposed, and no new street trees are proposed to be planted in the City’s ROW on L Ron Hubbard Way or Sunset Boulevard. Up to seven trees (date palms; 12 feet tall at installation) are proposed to be installed a new south entry road that would be located on the south side of the property and run from L Ron Hubbard Way to North New Hampshire Avenue.

As included in Project Design Feature **PDF-AES-1**, all construction lighting would be shielded or directed downward to preclude light pollution and limit light trespass onto adjacent uses. In accordance with LAMC Section 14.4.4 E, the Project is required to comply with lighting regulations that govern the orientation and intensity of outdoor lighting, including illuminated signage. In addition, a plan for any new street lighting adjacent to the redevelopment sites would be submitted to and must be approved by the Bureau of Street Lighting to ensure that adjacent properties would not be adversely impacted in accordance with City standards. Project lighting would also be subject to compliance with City standards related to the protection of off-site residential uses from excessive glare.

In addition, the Project includes project design features designed to shield views to Sites 1 through 6 and minimize visual disruption and effects to existing views to the extent practicable. For example, to reduce the visibility of construction sites from public vantage points, the implementation of Project Design Feature **PDF-AES-2** would require the installation of temporary construction fencing along the periphery of Sites 1 through 6 where construction activities are visible from pedestrian locations. In addition, the implementation of Project Design Feature **PDF-AES-3** would involve monitoring walkways and construction fencing accessible to the public for graffiti that would be removed, peeling postings, and uniform paint color or graphic treatment. The intent of

PDF-AES-3 is to remove graffiti, minimize unauthorized postings and a jumbled visual setting during construction.

As such, construction of the proposed Project would not result in conflicts with applicable zoning or other regulations governing scenic quality. Implementation of PDFs would further reduce the potential for conflicts with scenic quality regulations through the partially screening of Sites 1 through 6 and construction activities (to the extent practicable) from view. In addition, and pursuant to PRC Section 21099(d)(1) and ZI No. 2452, any temporary Project impacts concerning scenic quality regulation conflicts shall not be considered significant.

(2) Operation

(a) *Hollywood Community Plan – Project Site*

As previously stated, Objective 7 of the Hollywood Community Plan is the only policy pertinent to scenic quality. Objective 7 is “to encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.”²¹ As stated in the analysis of Threshold (a) above and illustrated on Figures IV.A-7 through IV.A-12 (including Figure IV-A-12A), Sites 1 through 6 would be sufficiently distanced from and lower in elevation than public vantage points in the Griffith Park area and Barnsdall Art Park such that redevelopment would not block or substantially alter the available scenic views of the Los Angeles Basin including the downtown skyline. Further, because streets with views of and toward the Project Site do not include prominent or significant views to scenic resources such as the Hollywood Sign or Hollywood Hills, proposed redevelopment would not substantially block significant existing views of these community features. Lastly, redevelopment of Sites 1 through 6 would not adversely impact existing views or substantially alter the natural character and topography of mountainous areas of the Hollywood Community, would not result in the degradation of significant views and scenic vistas, and would not conflict with the Objective 7 of the Hollywood Community Plan to preserve scenic views for the enjoyment of local residents and persons throughout the Los Angeles region.

Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts to scenic quality regulations shall not be considered significant.

²¹ City of Los Angeles, Hollywood Community Plan, December 13, 1988.

(b) *Hollywood Community Plan Update*

The discussion below is organized by Building Site and primarily consists of consistency analysis tables that list an applicable scenic quality policy of the Hollywood Community Plan Update and include an assessment of proposed redevelopment consistency or lack thereof.

Site 1

As addressed below in **Table IV.A-2**, redevelopment of Site 1 with a nine-level MOB and parking structure would not be consistent with Policy LU6.8 of the Hollywood Community Plan Update. Despite the inconsistency, a project need not be in perfect conformity with each and every policy to comply with the Hollywood Community Plan Update pursuant to *Sequoyah Hills Homeowners Association v. City of Oakland*. **In addition, and as previously stated, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

TABLE IV.A-2

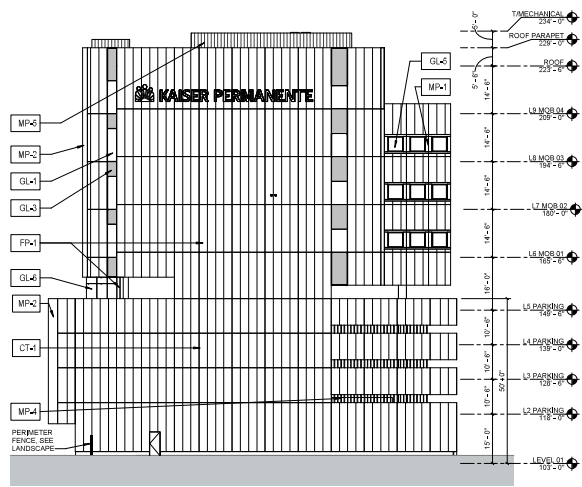
SITE 1 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. Due to the presence of numerous multistory hospital and MOB developments along the Sunset Boulevard corridor, and Hollywood Presbyterian Medical Center (located across North Vermont Avenue from Site 1), the local neighborhood displays a strong urban, medical office character. However, the local landscape is also marked by single- and multifamily residential developments, which generally occur off major corridors and on smaller north-south roadways.</p> <p>As proposed, the new nine-level MOB and parking structure would display compatible character and scale with existing medical office and hospital development but would contrast with the scale and character of one- to two-level residential uses. Yet, as these contrasts are a component of the existing visual landscape, redevelopment of Site 1 would be compatible with the existing character of the surrounding neighborhood.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Consistent. The scale and form of the proposed MOB and parking structure at Site 1 is illustrated on Figures IV.A-13 and IV.A-14. Land uses surrounding Site 1 are shown on Figures II-5 and IV.A-10. Further, zoning districts adjacent to Site 1 are shown on Figure II-7. Redevelopment of Site 1 would introduce a nine-level MOB and parking structure (approximately 129 feet tall)</p>

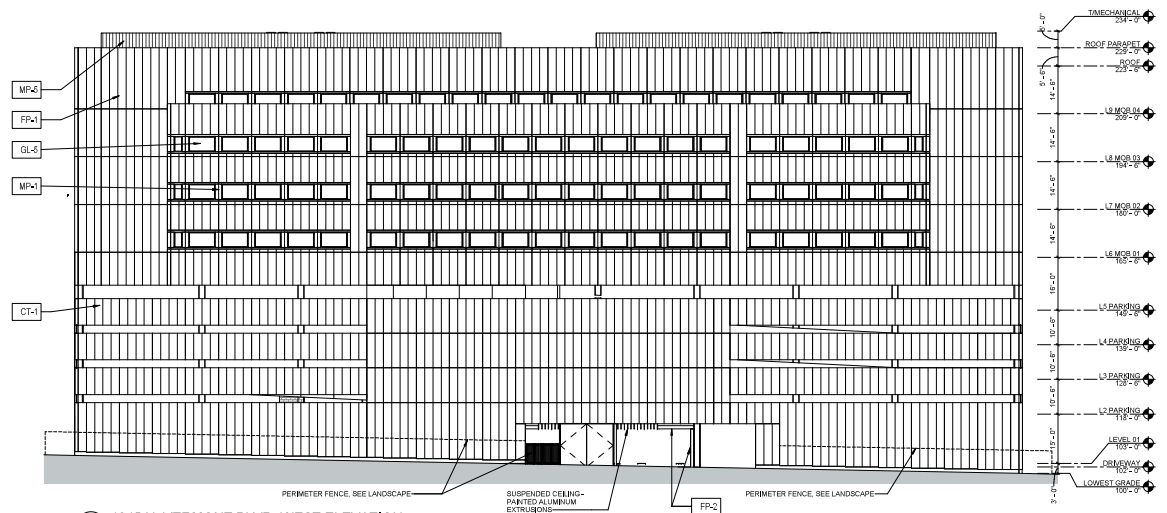
TABLE IV.A-2
SITE 1 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
	adjacent to existing two-level multifamily residential development off North New Hampshire Avenue on lands zoned R4. As the proposed MOB and parking structure would be substantially taller and bulkier than adjacent two-level multifamily structures in the R4 zone, proposed development would not result in a smooth transition in scale, form, and character with adjacent residential uses.
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environment on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Consistent. Site 1 is located approximately 0.10 miles from the nearest station (Vermont/Sunset) of the Metro B Line subway. As illustrated on Figure IV.A-14, the design of Site 1 would include trees and street front planters along the North Vermont Avenue streetscape. Further, the design of the MOB and parking structure would incorporate articulations above the first level to enhance pedestrian access and create a pedestrian-scale streetscape. The street trees offer a regular canopy of shade that would add to pedestrian comfort. Street trees would also give the Project's sidewalk a sense of security and enclosure, add natural color and beauty, and improve air quality. In addition, sidewalk furniture (e.g., benches), bike racks, and lighting is also proposed along the North Vermont Avenue streetscape and would enhance the pedestrian experience.</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. The Project includes a signage program that has been designed to be aesthetically compatible with the proposed architectural style of the new buildings and the existing buildings to remain, as well as the design of the existing signage to remain. Proposed signage would include building identification signs, logo signs for Kaiser Permanente, directional signs, orientation kiosks with maps and directories, welcome signs, parking entrance signs, pedestrian entrance signs, tenant brand signs for the commercial uses, Sign types would include internally illuminated lettering installed on building façades or above entryways, internally illuminated directional signage or projecting signs mounted to the sides of buildings, pillar signs, and small wall-mounted pedestrian-level signs.</p> <p>Further, signage associated with Site 1 (and all Building Sites within the Project Site) would not include large areas of reflective elements that could potentially generate noticeable glare onto adjacent streets and land uses.</p>

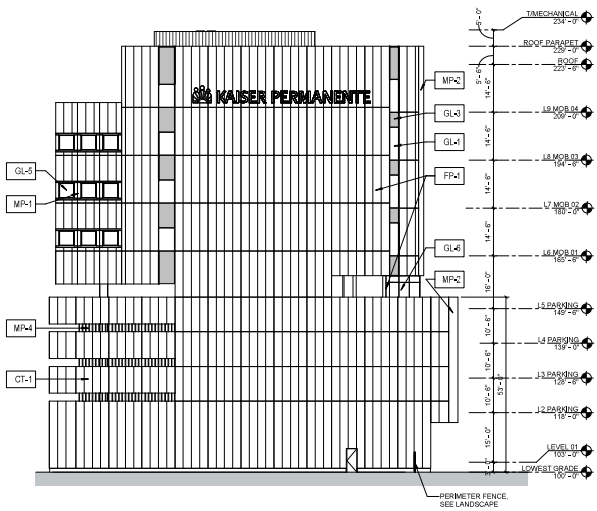
NOTE: MOB = medical office building.



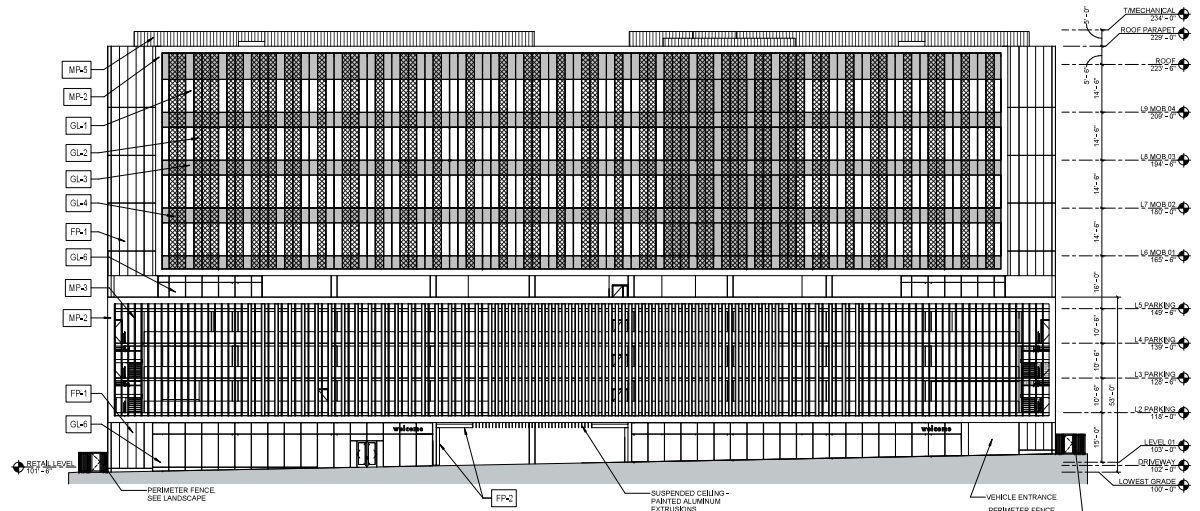
4 1345 N. VERMONT BLVD. NORTH ELEVATION
1/16" = 1'-0"



2 1345 N. VERMONT BLVD. WEST ELEVATION
1/16" = 1'-0"



3 1345 N. VERMONT BLVD. SOUTH ELEVATION
1/16" = 1'-0"



1 1345 N. VERMONT BLVD. EAST ELEVATION
1/16" = 1'-0"

SCALE: 1/16" = 1'-0"

FIGURE IVA-13
Elevations of Proposed Project: Site 1 Development

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Bird's Eye View Looking Northwest towards Site 1

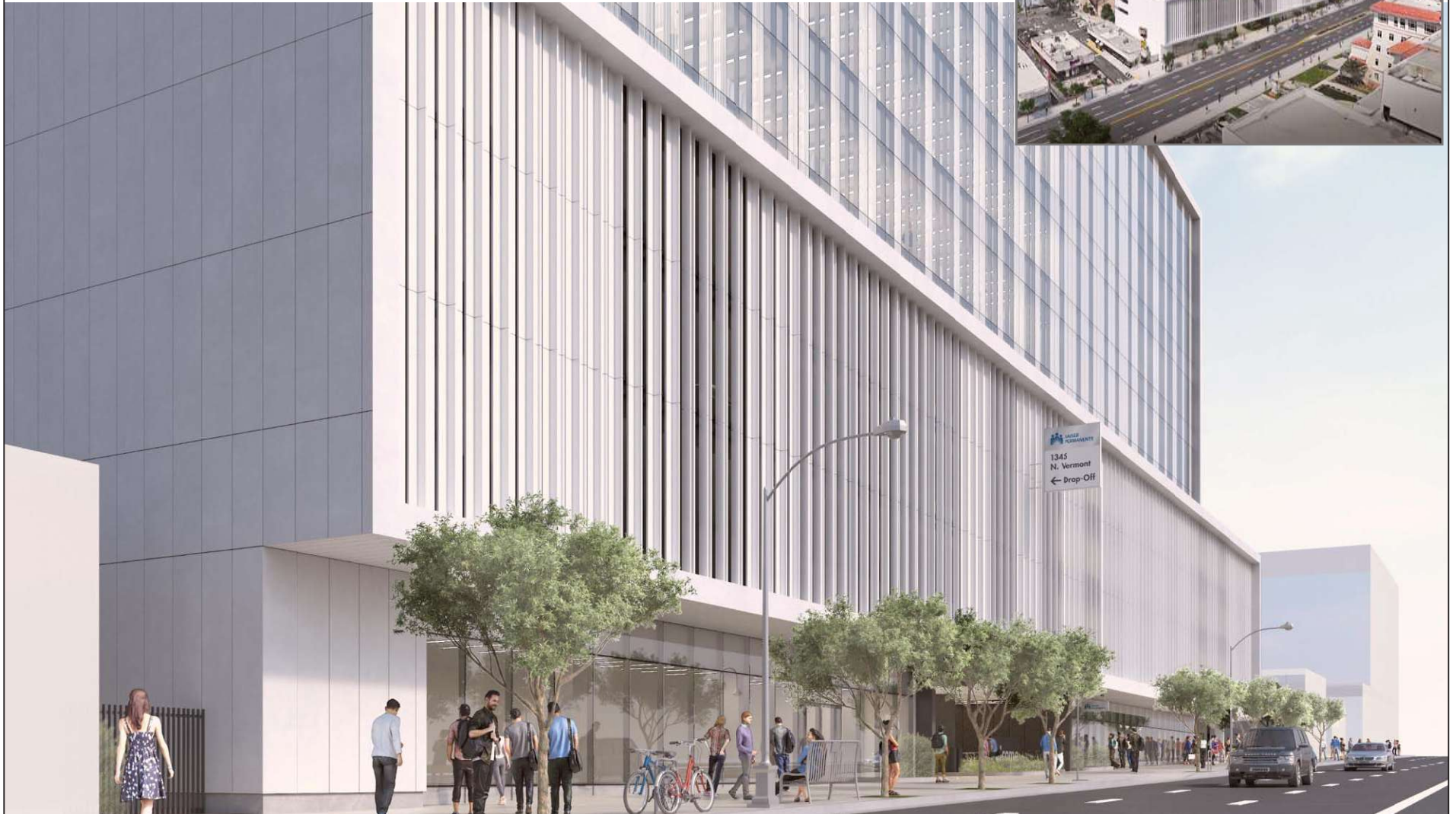
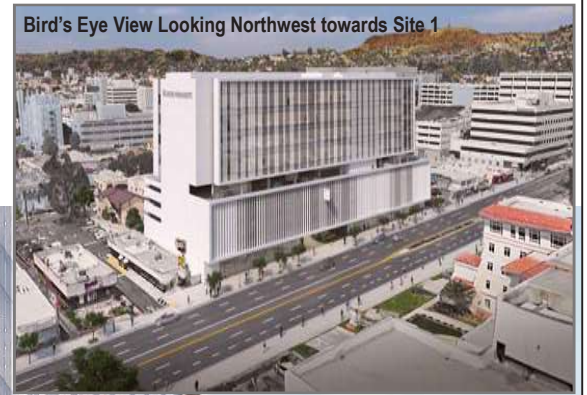


FIGURE IVA-14
Renderings of Proposed Project Design: Site 1 Development

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Site 2

Table IV.A-3 below details that redevelopment of Site 2 would not conflict with identified scenic quality regulations of the Hollywood Community Plan Update. Thus, no scenic quality regulation conflicts would occur. **In addition, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

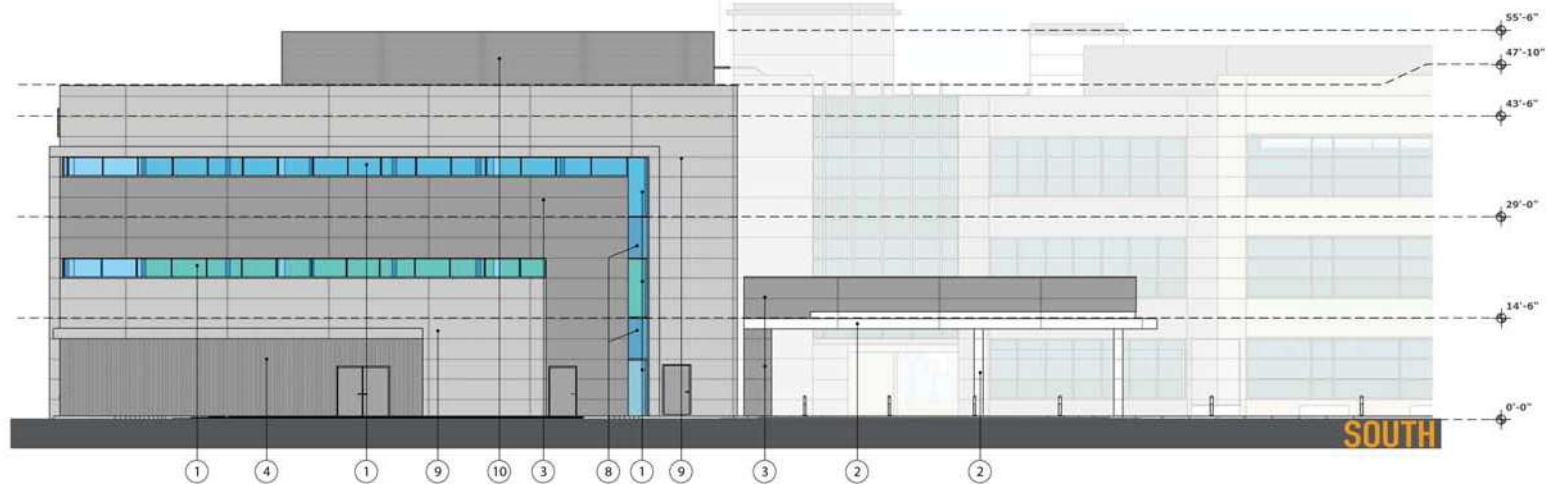
TABLE IV.A-3
SITE 2 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. See Consistency Analysis for Policy LU6.6 in Table IV.A-2, above, for summary of existing neighborhood character.</p> <p>Redevelopment of Site 2 with an 80-foot-tall MOB and procedure center would be compatible with existing medical and commercial office development along the Sunset Boulevard corridor. Elevations and rendering of development at Site 2 are depicted on Figures IV.A-15A, IV.A-15B, IV.A-16A, and IV.A-16B. As illustrated in Figure IV.A-10, office development ranging in height from 60 feet tall to 140 feet tall occurs on Sunset Boulevard between North Edgemont Street and North Vermont Boulevard. Further, redevelopment of the site as proposed would generally be compatible with the scale and character of the existing MOB located on site at 4760 Sunset Boulevard. While the proposed development at Site 2 would be considerably taller than and contrast in character with one- and two-level development located to the south, redevelopment would be compatible with the existing character of the larger surrounding neighborhood that includes a mix of low- and tall-profile development.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Applicable. As shown on Figure II-7 (in Chapter II), Site 2 is within the C2 and PB zones. As proposed, the new four-level MOB and procedure building would be located on the C2-zoned portion of Site 2. The new MOB would maintain the existing driveway along the southern boundary of 4760 Sunset Boulevard and would replace existing surface parking with loading and drop-off zones, landscaping (i.e., adjacent to the nearby residential property line; see Figure III-3 in Chapter III), a service yard, and trash enclosure. Since the new MOB and procedure building would not be directly adjacent to residential districts, Policy LU6.8 is not applicable to Site 2.</p>

TABLE IV.A-3
SITE 2 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Consistent. Located approximately 550 feet from the nearest station (Vermont/Sunset) of the Metro B Line subway, renderings for Site 2 envision a pedestrian-friendly design and lively streetscape. Renderings of the Site 2 development frontage of Sunset Boulevard are included on Figures IV.A-16A and IV.A-16B. While redevelopment of the site would result in the removal of approximately seven trees, new landscaping would be installed in the southern portion of the site along a proposed loading and drop-off area. Landscaping and planting areas are also proposed in this area to act as a vegetative buffer of the new development from residential land uses to the south. Near the south entrance to the new building, pedestrian furniture including benches and bike racks would be installed, as would rectangular planters. The south entrance would also be marked by decorative concrete paving. Along the building's frontage of Sunset Boulevard and within the site footprint, decorative concrete paving is proposed along with a large planter wall featuring shrubs. New perimeter landscaping is also proposed along North New Hampshire Avenue.</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. See Consistency Analysis for Policy LU7.8, Table IV.A-2, above which applies to new signage at Sites 1 through 6.</p>

NOTE: MOB = medical office building.



- | | |
|---|---|
| <ul style="list-style-type: none"> ① HIGH EFFICIENT GLAZING - VISION (Solar Ban glazing / View Glass) ② METAL PANEL RAIN SCREEN SYSTEM - (COLOR 1 - Bone white / Centria - Entyre series) ③ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 1 - Medium Grey / finish Metallic) ④ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 2 - Light Grey / Pattern wave / finish Metallic) ⑤ GREEN SCREEN WALL (Metal cable system over a CMU wall system) | <ul style="list-style-type: none"> ⑥ EXTERIOR WALL TILE SYSTEM (Color Grey - AM34 / Daltile - Ambassador) ⑦ BUILDING / SITE SIGNAGE ⑧ HIGH EFFICIENT GLAZING - SPANDREL (Solar Ban glazing / View Glass) ⑨ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 3 - Light Grey / finish Metallic) ⑩ MECHANICAL SCREEN METAL LOUVERS (COLOR 1 - Medium Grey) |
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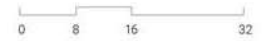


FIGURE I.V.A-15A
Elevations of Proposed Project: Site 2 Development

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|---|---|
| <ul style="list-style-type: none"> ① HIGH EFFICIENT GLAZING - VISION (Solar Ban glazing / View Glass) ② METAL PANEL RAIN SCREEN SYSTEM - (COLOR 1 - Bone white / Centria - Entyre series) ③ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 1 - Medium Grey / finish Metallic) ④ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 2 - Light Grey / Pattern wave / finish Metallic) ⑤ GREEN SCREEN WALL (Metal cable system over a CMU wall system) | <ul style="list-style-type: none"> ⑥ EXTERIOR WALL TILE SYSTEM (Color Grey - AM34 / Daltile - Ambassador) ⑦ BUILDING / SITE SIGNAGE ⑧ HIGH EFFICIENT GLAZING - SPANDREL (Solar Ban glazing / View Glass) ⑨ EXTERIOR INSULATION AND FINISH SYSTEM (EIFS) - (COLOR 3 - Light Grey / finish Metallic) ⑩ MECHANICAL SCREEN METAL LOUVERS (COLOR 1 - Medium Grey) |
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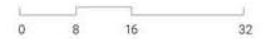


FIGURE IV.A-15B
Elevations of Proposed Project: Site 2 Development

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April 17, 2019

NORTH
MAIN VIEW

HMC Architects

FIGURE IV.A-16A
Renderings of Proposed Project Design: Site 2 Development

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FIGURE IV.A-16B
Renderings of Proposed Project Design: Site 2 Development

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Site 3

Table IV.A-4 details that redevelopment of Site 3 would not conflict with identified scenic quality regulations of the Hollywood Community Plan Update. Thus, no scenic quality regulation conflicts would occur. **In addition, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

TABLE IV.A-4
SITE 3 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. As proposed, redevelopment of Site 3 would include the replacement of an 87-foot-tall MOB (79,000 sf) with an up to 90-foot-tall MOB (73,500 sf). Elevations of optional development of Site 3 are illustrated in Figures IV.A-17 and IV.A-18. As such, the scale of the proposed MOB would be consistent and compatible with the scale of existing on-site development. The character of the existing and proposed MOB's are depicted on Figure IV.A-19. While building materials on the new MOB would differ, the new MOB would display a similar form and mass as the existing MOB. Further, the ground-level design of the new MOB includes a widened pedestrian corridor that may (like redevelopment properties within the Project Site) feature amenities including benches, planters, and varied paving materials.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Applicable. As shown on Figure II-7 in Chapter II, Site 3 is situated adjacent to Sunset Boulevard to the south and residentially zoned lands to the north. While zoned for residential use, the property to the north of Site 3 is developed with a 50-foot-tall hospital parking structure. Therefore, since Site 3 is not adjacent to a residential district that supports residential development, Policy LU6.8 is not applicable to redevelopment of Site 3.</p>
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Consistent. Site 3 is located approximately 0.30 miles from the nearest station (Vermont/Sunset) of the Metro B Line subway. See Consistency Analysis for Policy LU6.6 above. As demonstrated in Figure IV.A-19, design of the proposed MOB includes a projection along the south elevation that would expand the pedestrian corridor off Sunset Boulevard to accommodate pedestrian amenities and landscape (minimal landscaping is proposed for Site 3).</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. See Consistency Analysis for Policy LU7.8, Table IV.A-2, above which applies to new signage at Sites 1 through 6.</p>

NOTE: MOB = medical office building; sf = square feet.

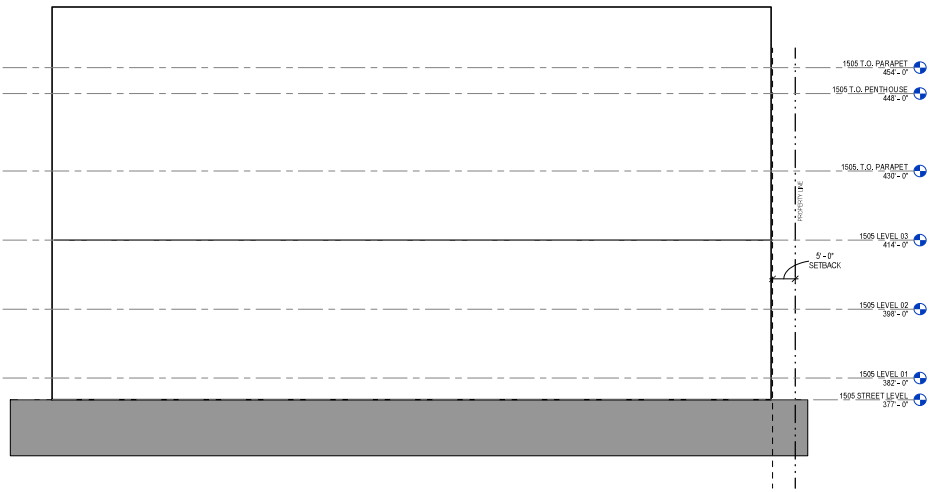
Site 4

Table IV.A-5 details that redevelopment of Site 4 would not conflict with identified scenic quality regulations of the Hollywood Community Plan Update. Thus, no scenic quality regulation conflicts would occur. **In addition, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

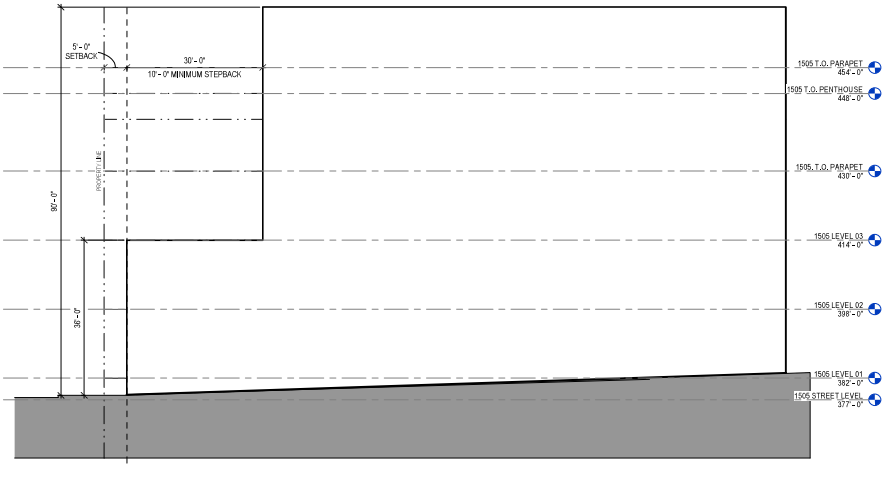
TABLE IV.A-5
SITE 4 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. Redevelopment of Site 4 consists of the replacement of a 105-foot-tall MOB (120,557 sf) with a 105-foot-tall hospital expansion or medical office building (177,300 sf). Despite the increase square footage, the hospital expansion/MOB use would display a similar scale and character as existing on-site development. Elevations and renderings of proposed redevelopment of Site 4 are included on Figures IV.A-20 and IV.A-21. As shown on the figures, proposed redevelopment would also be compatible with existing hospital, medical, and parking structure development along the Sunset Boulevard corridor.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Applicable. As shown on Figure II-7 in Chapter II, Site 4 is situated adjacent to commercially zoned lands to the south and residentially zoned lands to the north. While zoned for residential use, the property to the north of Site 4 supports a 75-foot-tall hospital campus utility building. Therefore, since Site 4 is not adjacent to a residential district that supports residential development, Policy LU6.8 is not applicable to redevelopment of Site 4.</p>
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Not Applicable. While Site 4 is located approximately 0.30 miles from the nearest station (Vermont/Sunset) of the Metro B Line subway, it is set back from Sunset Boulevard. As shown in Figure IV.A-21, the existing parking lot, landscaping, and pedestrian path featuring benches, landscaping (trees and planters), trash receptacles, and signage and lighting to the south of Site 4 would be maintained during construction and operations. Therefore, no improvements to the Sunset Boulevard streetscape are proposed or required.</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. See Consistency Analysis for Policy LU7.8, Table IV.A-2, above which applies to new signage at Sites 1 through 6.</p>

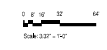
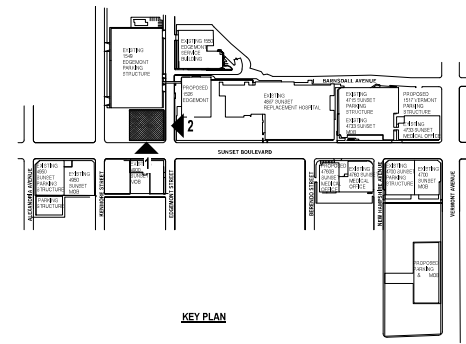
NOTE: MOB = medical office building; sf = square feet.



① 1505 EDMONT SOUTH ELEVATION
332' x 112'



② 1505 EDMONT EAST ELEVATION
332' x 112'



KEY PLAN

SOURCE: Perkins + Will, 2018

FIGURE IVA-17
Elevations of Proposed Project: Site 3 Development (Option A)

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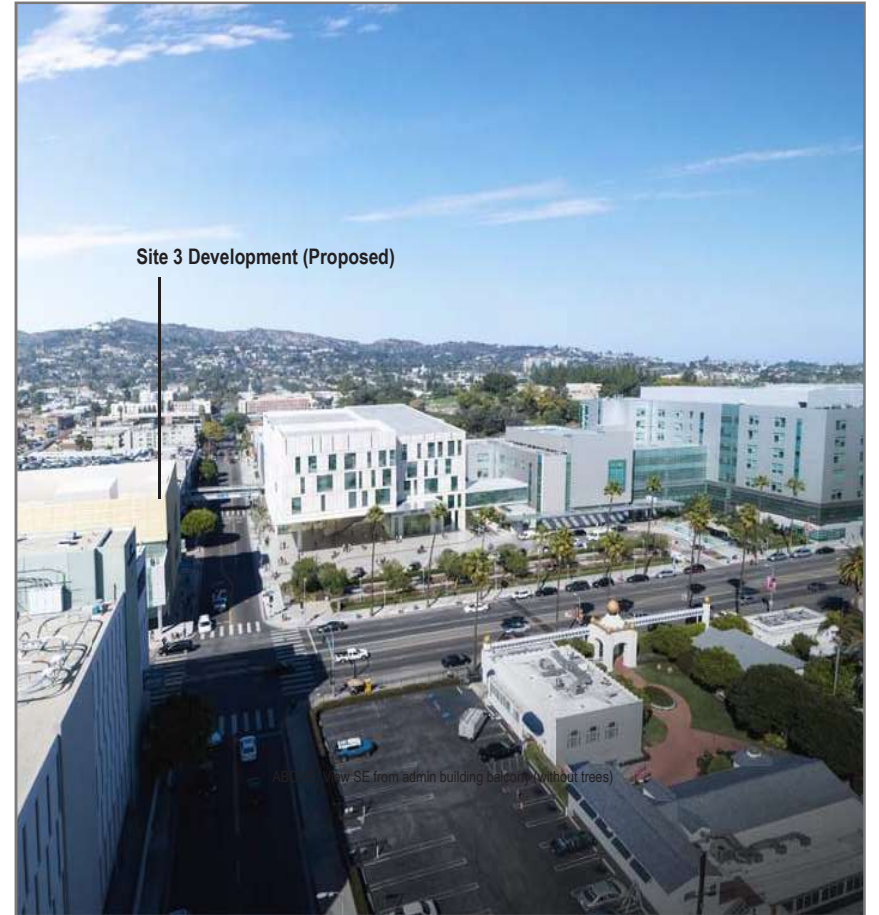


FIGURE IVA-19
Rendering of Proposed Project: Site 3 Development

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Bird's Eye View Looking Northeast towards Site 4

FIGURE IVA-21
Renderings of Proposed Project Design: Site 4 Development

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Site 5

Table IV.A-6 details that redevelopment of Site 5 would not conflict with identified scenic quality regulations of the Hollywood Community Plan Update. Thus, no scenic quality regulation conflicts would occur. **In addition, pursuant to SB743 and ZI File NO. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

TABLE IV.A-6
SITE 5 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. Elevations and renderings of proposed redevelopment of Site 5 are included on Figures IV.A-22 and IV.A-23. Redevelopment of Site 5 with an up to 105-foot-tall, eight-level parking structure (with 2,300 sf of commercial space) would be compatible the scale and character of development to the immediate west, south, and more generally, with hospital, medical office, and commercial office development on the Sunset Boulevard corridor. As shown in Figure IV.A-23, the proposed structure would display a similar scale and office development character as the existing MOB at 1515 North Vermont Avenue and the MOB at 4700 Sunset Boulevard. The upper floors of the parking structure would feature translucent metal screens (these features are not installed on adjacent properties), yet proposed building form would be compatible with nearby development.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Applicable. As shown on Figure II-7 in Chapter II, Site 5 is surrounded by commercially zoned lands. Therefore, Policy LU6.8 is not applicable to redevelopment of Site 5.</p>
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Consistent. In addition to an eight-level parking structure, redevelopment of Site 5 includes a new 2,300-sf commercial space along the site's frontage of North Vermont Avenue. As shown on Figure IV.A-23, the street-level commercial space would include a transparent façade to allow visibility and create a welcoming environment for pedestrians/visitors. The façade and architectural elements are also distinct from that of the parking structure in order to clearly identify the differing uses.</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. See Consistency Analysis for Policy LU7.8, Table IV.A-2, above which applies to new signage at Sites 1 through 6.</p>

NOTE: sf = square feet; MOB = medical office building.

Site 6

As addressed below in **Table IV.A-7**, redevelopment of Site 6 with a 90-foot-high parking structure expansion would not be consistent with Policy LU6.8 of the Hollywood Community Plan Update. Despite the inconsistency, a project need not be in perfect conformity with each and every policy to comply with the Hollywood Community Plan Update pursuant to *Sequoyah Hills Homeowners Association v. City of Oakland*. **In addition, and as previously stated, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts including conflicts with scenic quality regulations shall not be considered significant.**

TABLE IV.A-7
SITE 6 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU6.6: Neighborhood design features. Support new and infill development that evokes the distinct architectural and site design features of the neighborhood. Seek compatibility to protect the existing character and scale.</p>	<p>Consistent. See Consistency Analysis for Policy LU6.6, Table IV.A-2, above for summary of existing neighborhood character.</p> <p>A conceptual rendering of proposed development on Site 6 is included on Figure IV.A-24. Redevelopment of Site 6 with a 90-foot-tall parking structure would generally be compatible with the scale, form, and character of existing development along the Sunset Boulevard corridor. As illustrated in Figure IV.A-10, office and parking structure development ranging in height from 30 feet tall to 140 feet tall occurs on Sunset Boulevard between North Edgemont Street and North Vermont Boulevard. Existing parking structures in the vicinity of Site 6 include an 80-foot-tall structure immediately adjacent to the north, and a 50-foot-tall structure located approximately 650 feet away at 1549 Edgemont Street.</p> <p>While the proposed development at Site 6 would be considerably taller than and contrast in character with one- and two-level residential development to the south, redevelopment would be compatible with the existing character of the larger surrounding neighborhood that includes a mix of low- and tall-profile development.</p>
<p>Policy LU6.8: Neighborhood transitions. Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations and landscaping of new development adjacent to residential districts.</p>	<p>Not Consistent. The scale and form of the proposed parking structure at Site 6 is illustrated on Figure IV.A-24. Land uses surrounding Site 6 are shown on Figure II-5. Redevelopment of Site 6 would introduce a nine-level parking structure (approximately 90 feet tall) adjacent to existing one-level single-family residential development to the immediate south on lands zoned R4. As the proposed parking structure would be substantially taller and bulkier than adjacent low-profile homes in the R4 zone, proposed development would not result in a smooth transition in scale, form, and character with adjacent residential uses.</p>

TABLE IV.A-7
SITE 6 CONSISTENCY ANALYSIS WITH HOLLYWOOD COMMUNITY PLAN UPDATE POLICIES

Policy	Consistency Analysis
<p>Policy LU7.4: Pedestrian friendly building design. Encourage building designs that create interesting, safe and welcoming walking environmental on streets with high pedestrian activity. Utilize the Citywide Urban Design Guidelines to promote pedestrian-oriented retail with transparent facades to allow visibility of commercial uses.</p>	<p>Not Applicable. As most of the development to the south of Site 6 consists of residential uses, North Alexandria Avenue (between Fountain Avenue and Sunset Boulevard) does not support “high” pedestrian activity. While residents use the sidewalks regularly, the corridor does not generate high pedestrian use as would a corridor featuring commercial retail and or medical-focused retail development. Further, redevelopment of Site 6 does not include commercial uses.</p>
<p>Policy LU7.8: Commercial signage. Promote aesthetically pleasing commercial signage, limiting the use of billboards, pole signs and cabinet signs.</p>	<p>Consistent. See Consistency Analysis for Policy LU7.8, Table IV.A-2, above which applies to new signage at Sites 1 through 6.</p>

(c) *Specific Plan/SNAP*

Project consistency with applicable regulations of the SNAP, including those applicable to scenic quality—such as height and floor area limitations and other development standards relating to aesthetics—are fully addressed in Section IV.1, Land Use and Planning, of this Draft EIR. Further, the SNAP and LAMC Section 11.5.7 C provide that the construction of any new structure requiring the issuance of a building permit within the SNAP area is subject to Project Permit Compliance review by the Los Angeles Department of City Planning for compliance with all regulations in the SNAP. Therefore, the proposed Project will undergo this review to confirm that it would not conflict with the regulations of the SNAP.

In regards to height, the SNAP provides that Hospital and Medical Uses are generally limited to a maximum building height of 100 feet, inclusive of the height of parapets and screening as well as roofs and roof structures (e.g., for stairwell and elevator shafts, etc.) for the purposes specified in Section 12.21.1(1)(B) of the LAMC (see below section LAMC Considerations, Section B. Roofs and Roof Structures), which must be set back at least 10 feet from the roof perimeter and screened from view. The Project includes a 129-foot-tall MOB/parking structure at Site 1, an 80-foot-tall procedure center addition at Site 2, a 105-foot-tall parking structure at Site 5, and a 90-foot-tall parking structure addition at Site 6. Under Option A, the Project includes a 70-foot-tall MOB at Site 3 and a 105-foot-tall MOB at Site 4. Under Option B, the Project includes a 90-foot-tall MOB at Site 3 and a 100-foot-tall hospital addition at Site 4. As such, components of the Project would exceed the 100-foot maximum building height. However, the SNAP also provides the Director of Planning with discretionary authority to approve additional building height up to 200 feet, plus the height of roofs and roof structures, if the Hospital and Medical Use is part of a

“Unified Hospital Development” as defined in the SNAP. The proposed Project Site will be a part of a Unified Hospital Development as defined in the SNAP (as amended by the proposed SNAP Amendment).

As further described in the Project Description, the proposed signage program for the Project would require an Amendment to the SNAP to allow for signs that are currently prohibited or limited by SNAP provisions. The proposed amendment would involve revising the SNAP to allow off-site directional signs that provide directions and monument signs. Allowing for directional signage would improve traffic flow on the streets and in the neighborhoods surrounding Kaiser’s medical center campus. Directional signage would also reduce traffic and pedestrian safety hazards by ensuring that drivers and pedestrians are well directed and not distracted by searching for the appropriate building.

Regarding pedestrian throughways, the Project shall provide one public pedestrian walkway, throughway, or path for every 250 feet of street frontage for a Project. The Project will provide an arcade or through interior pedestrian path from the rear property line or from the parking lot or public alley or street if located to the rear of the Project, to the front lot line, and from the side lot line to the lot line on the opposite side. The pedestrian throughway shall be accessible to the public and have a minimum vertical clearance of 12 feet, and a minimum horizontal clearance of 10 feet. The Project Permit Compliance review would ensure the Project is consistent with all SNAP regulations regarding Pedestrian Throughways.

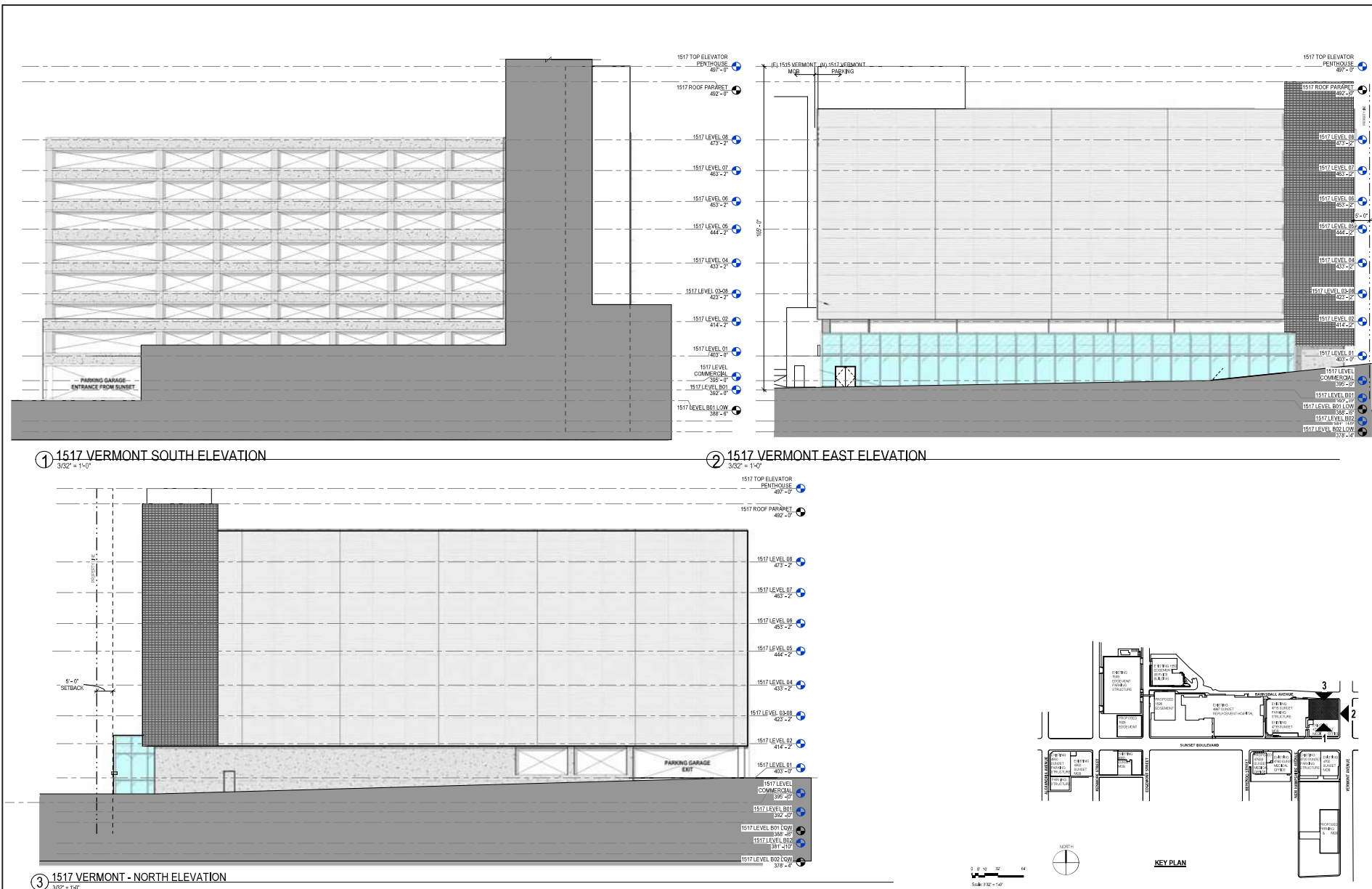
Director of Planning approval is required for proposed building heights at Sites 1 and 5 as redevelopment of these sites would result in exceedance of the maximum building height for Hospital and Medical Uses. Therefore, with Director approval of heights for Sites 1 and 5, the project would be consistent with the SNAP. In addition, **pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, any Project impacts to scenic quality regulations shall not be considered significant.**

(3) Mitigation Measures

This analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(4) Level of Significance after Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures were required and the impact level remains not significant.



SOURCE: Perkins + Will, 2018

FIGURE IVA-22
Elevations of Proposed Project: Site 5 Development

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FIGURE IVA-23
Rendering of Proposed Project Design: Site 5 Development

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FIGURE IVA-24
Rendering of Proposed Project Design: Site 6 Development

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Threshold (d): *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

(1) Light and Glare

(a) Construction

The proposed Project would be constructed over an approximately 10-year period and would occur in three phases. Project construction is tentatively scheduled to begin in 2020. Throughout the duration of construction, construction activities would typically occur during hours permitted by LAMC Section 41.40, between 7:00 a.m. to 9:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays and national holidays, with no construction permitted on Sundays. While the majority of construction would occur during daylight hours, there is a potential based on the proposed Project's anticipated construction hours that construction could occur in the evening hours and require the use of artificial lighting. Potential for nighttime lighting uses would be greatest during winter months when daylight hours are shortest in the year. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, are typically used during evening construction activities. However, with the exception of security lighting that would operate overnight to deter unauthorized access onto construction sites, the use of nighttime lighting would be temporary, infrequent, and would cease upon completion of Project construction. Overnight security lighting would generally operate during the duration of construction activities on Sites 1 through 6.

Potentially bright construction lighting would be focused on the particular active construction area undergoing work. Accordingly, uses that are not adjacent to active construction sites would not be anticipated to be illuminated and substantially affected by construction lighting. Furthermore, lighting sources utilized during construction including lighting for security would typically be directed downward and would consist of hooded fixtures that minimize unnecessary illumination of off-site areas. In addition, incorporation of Project Design Feature **PDF-AES-2** would entail the installation of temporary construction fencing along the periphery of Sites 1 through 6. Fencing would screen construction activity from view at the street level and would reduce potential lighting spillover from extending beyond Sites 1 through 6 to off-site areas. Therefore, through adherence to existing LAMC regulations governing permitted hours of construction and with implementation of Project Design Feature **PDF-AES-1**, the need for nighttime lighting would be minimized and construction sites (and low-mounted lighting sources) would be partially screened from view of nearby pedestrians. Further, the limited lighting anticipated during construction activities would not significantly impact nighttime views at off-site locations in the surrounding areas, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare generated during construction would be highly transitory and experienced over a short-term duration. In addition, large and particularly reflective surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. If generated, glare from vehicles that elect to park on Sites 1 through 6 would be like existing glare from vehicles in an urban environment. The installation of perimeter fencing around Sites 1 through 6 (i.e., **PDF-AES-2**) would also intercept potential glare generated by on-site sources at the ground level. Also, at Sites 1 and 5, which are located near Metro stations, wooden construction fencing would be installed at the boundary of the areas with public access, as per the Metro Adjacent Construction Design Manual. Fencing (at least 8 feet tall and meeting all applicable code requirements) would intercept potential glare generated on site by sources at the ground level. Regarding building frames, structural steel that will be used for the proposed Project's buildings is not generally considered particularly reflective and would not be a substantial source of potential glare during building construction. If any perceptible glare is generated from these sources, exposure would be transient as receptors move through the landscape. In addition, any potential glare generated during construction would be experienced over a temporary, short-term basis in any given location and would not result in long-term adverse effects to daytime views. Therefore, as it relates to construction activities, there would be a negligible potential for daytime or nighttime glare to occur.

Thus, the proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area during the construction phase because: (1) any aesthetics impact the proposed Project may produce cannot be considered a significant impact on the environment under California PRC Section 21099; and (2) light and glare associated with construction of the proposed Project would not result in a change in ambient illumination levels, or result in light spillover onto adjacent light-sensitive areas. For these reasons, construction lighting and glare impacts of the Project are not considered significant.

As it relates to the Project creating a new source of substantial light or glare that would adversely affect day or nighttime views in the area during construction, no mitigation measures are required. Impacts would be **less than significant**. **Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI File No. 2452, any Project impacts to day and nighttime views due to new sources of light and glare shall not be considered significant.**

(b) *Operation*

The proposed Project involves the expansion of the existing Kaiser Permanente Medical Center campus by replacing facilities and adding new healthcare buildings and associated parking structures. Existing lighting at the Project Site consists of interior and exterior lighting sources for sites that are already developed with structures (Sites 1, 3, 4, and 5) and exterior lighting sources (such as parking lot lighting) for Sites 2 and 6.

Streetlights, parking garages and lots, and healthcare, residential, commercial, and public development in the immediate area also contribute lighting to the nighttime environment. Proposed demolition of existing development at all building sites would include the removal of interior and/or exterior lighting sources. Construction would include the installation of new interior and exterior lighting fixtures, including at outdoor lighting entryways/driveways, along pedestrian pathways, and within parking structures at Sites 5 and 6. Other sources of lighting would include outdoor lighting along building elevations, lighting on terraces, and lighting emanating from interior workspaces and healthcare facilities. Additionally, signage is proposed throughout the exterior of the buildings at Sites 1, 2, 4, and 5, which would be illuminated at night. As with existing signage along area roads and on medical/hospital campuses, proposed directional signage in various locations would be illuminated during evening and nighttime hours.

While the proposed Project would include several new lighting sources, and lighting on Sites 1 through 6 would generally be greater when compared to existing conditions, the proposed Project would comply with all applicable LAMC regulations related to lighting. For example, the LAMC requires that exterior light sources not exceed two foot-candles of lighting intensity of light spillover on residential properties and prohibits direct glare from the light source onto residential properties (Section 93.0117(b), Outdoor Lighting Affecting Residential Property). The proposed Project would be conditioned to meet this requirement. Furthermore, in order to reduce light spillover from Sites 1 through 6 onto residential uses, outdoor lighting will be shielded such that the light source cannot be seen from adjacent residential properties, the public ROW, or from above. Also, and pursuant to LAMC Section 12.21 A 5(k), all parking area lights would be designed, located, and arranged to reflect light away from any streets and adjacent premises. In addition, lighting design elements shall include use of light fixtures that comply with the ratings specified in CALGreen Table 5.106.8, as follows:

- Use of light fixtures with a focused output where the output angles greater than 20 degrees from beam centerline do not exceed 500 candelas; and
- Glare shields and louvers attached to the front face of the light fixture; and/or architectural screens to conceal the direct view of the LED light fixtures the center of adjacent streets at Site 1 through 6 boundaries to the north, south, east, and west.

Regarding proposed signage along the building façades, per the LAMC, illuminated signs would not project more than 3 feet from the façade of the building (Section 14.4.9(E)). Further, no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property (Section 14.4.4 (E)). As the proposed Project would be required to meet all applicable LAMC requirements related to lighting and the installation of shielded lighting compliant with applicable State regulations, Project lighting would not adversely affect nighttime views in the surrounding area. In addition, existing sources of nighttime lighting in the surrounding area (including lighting on nearby MOB's and hospital campuses) are similar and display comparable operational characteristics to lighting sources proposed by the Project.

The proposed Project would have the potential to create glare during daylight hours due to the installation of potentially reflective materials (primarily glass windows) on building exteriors. However, new development on Sites 1 through 6 would be designed in a contemporary architectural style and would feature a variety of exterior building materials. For example, the exterior of the proposed MOB's may feature pre-fabricated façade panels, metal panels, painted concrete, and painted aluminum extrusions. Similar building materials as proposed by the Project are featured in MOB, hospital, and office development in the surrounding area. Furthermore, to reduce glare, all exterior windows and glass used on building surfaces will be non-reflective or treated with an anti-reflective coating to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the CEC as may be amended, glass with coatings required to meet the CEC requirements will be permitted. In addition, the use of highly reflective glass in the redevelopment of Sites 1 through 6 would be prohibited. Rather, glass used in building façades will be anti-reflective or treated with an anti-reflective coating to minimize glare. The avoidance of highly reflective glass would minimize the potential for proposed development on Sites 1 through 6 to generate glare that could be received at off-site locations and adversely affect the quality of daytime views.

As detailed above, the proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area during the operation phase. **Thus, operational light and glare impacts are considered to be less than significant. Furthermore, pursuant to California PRC Section 21099(d)(1) and ZI File No. 2452, any Project impacts to daytime and nighttime views due to new sources of light and glare shall not be considered significant.**

(2) Mitigation Measures

This analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

As discussed above, this analysis is provided for informational purposes only. The aesthetic impacts of the Project shall not be considered significant pursuant to California PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no mitigation measures were required and the impact level remains not significant.

e) Cumulative Impacts

As identified in **Table II-2**, in Chapter II, Environmental Setting, potentially related development projects have been identified in the vicinity of Sites 1 through 6 and generally, within the Hollywood Community Plan area. Specifically, development projects 5, 11, 14, 23, 36, and 60 (the only development projects on Figure II-10, Related Projects, that, similar to the proposed Project, are in the SNAP), are considered in the potentially related projects impact analysis below. Cumulative aesthetics impacts for each threshold are analyzed below.

As previously discussed, no aesthetic impact by the proposed Project, which is an infill employment center project within a TPA, shall be considered a significant impact under California PRC 21099.

(1) Impact Analysis

(a) *Scenic Vistas*

In general, scenic vista and visual resource impacts of the related projects would be site-specific and would not be expected to combine with other projects to create a cumulative impact on views from elevated trails in Griffith Park (or from Barnsdall Art Park) or result in substantial degradation of the existing character of the area. However, related projects near the overall Project Site would result in modified views when considered in combination with the proposed Project.

Related projects that are being proposed and/or constructed include a variety of uses, including apartments, offices, and a hotel. Those located closest to Sites 1 through 6 include the following:

- 30,933-gross-square-foot office development at the Hollywood Presbyterian Hospital site (i.e., within 70 feet of Site 1) (see Map No. 23 on Figure II-10)
- 150 apartments and ground-floor retail on an existing surface parking lot at 4900 West Hollywood Boulevard (approximately 850 feet northwest of Site 4) (see Map No. 5 on Figure II-10)
- 101-unit residential and retail mixed-use development at the site of an existing commercial strip retail development at 4850 West Hollywood Boulevard (approximately 700 feet north of Site 4) (see Map No. 60 on Figure II-10)
- A hardware store is also under construction or proposed along West Hollywood Boulevard near Barnsdall Art Park (see Map No. 14 on Figure II-10)
- 21 apartments at 4773 West Hollywood Boulevard (see Map No. 36 on Figure II-10)
- 202-unit apartment development including ground-floor retail and restaurant uses at 1515 North Hillhurst Avenue (0.25 miles east of Site 5) (see Map No. 11 on Figure II-10)

Lastly, while located approximately 0.9 miles from Site 4, the proposed 104-unit apartment and ground-floor retail development on the site of an existing gas station at 1868 North Western Avenue (see Map No. 16 on Figure II-10) is the closest identified related project to elevated trails in Griffith Park. The proposed mixed-use development is within the Hollywood Community Plan area but outside of the SNAP. As these developments are closest to the overall Project Site (and Map No. 16 is closest to Griffith Park), they would have the greatest potential to combine with redevelopment of Sites 1 through 6 to create a cumulative impacts on scenic views from the Griffith Park area and from Barnsdall Art Park.

The cumulative development of the Project along with other related projects would alter the visual landscape as viewed from nearby trails and Barnsdall Art Park generally through increased introduced building density and bulk to the local landscape. As the Project and identified related projects are implemented, the local development pattern will appear denser and display a more urban character. However, the identified cumulative projects described above and listed in Table II-2 of the Environmental Setting chapter are in an urban area that has already been subject to comparably dense residential and hotel development and office, retail, and studio uses. Furthermore, the identified cumulative projects are set back approximately 1 mile or more from the Griffith Park trails, and due

to the distance and superior elevation of the trails, the cumulative projects would not block or interrupt available views or substantially alter the quality of the visible urban landscape. Regarding Barnsdall Art Park, the closest cumulative projects (i.e., Map Nos. 60, 5, 14, and 36) are located to the north or northwest and would not be viewed in line with redevelopment of Sites 1 through 6 (generally located to the south of the park). As such, these projects would not contribute to a potential cumulative view impact in combination with the Project. Cumulative residential projects to the north of the park (specifically, Map Nos. 5 and 16) could introduce taller buildings to the landscape as compared to existing conditions. However, due to the elevated terrain of the park, it is anticipated that view corridors to the north would remain available.

Additionally, due to the location of the majority of cumulative projects in a highly urbanized area of the City, it is likely that some of the related projects would also be located within a TPA, which exempts the potential aesthetic impacts of those projects, per California PRC Section 21099. **Thus, although development of the proposed Project, in combination with the development of the related projects, would result in a general intensification of land uses in an already urbanized area of the City, due to the Project's location in a highly urbanized area and the site-specific nature of cumulative projects, the proposed Project would not combine with any related projects to generate a significant cumulative impact with respect to scenic vistas or views. Further, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, scenic vista impacts of an employment center project located on an infill site within a TPA shall not be considered significant impacts on the environment, and as such the proposed Project's contribution to cumulative impacts would not be cumulatively considerable with regards to scenic vistas, and cumulative impacts with respect to scenic vistas would be less than significant.**

(i) Conflicts with Regulations Governing Scenic Quality

Like scenic vista impacts, conflicts with scenic quality regulations resulting from implementation of the related projects would be site- and development proposal-specific. As such, plan conflicts identified for the proposed Project would not be expected to combine with other projects to create a cumulative plan conflict. However, related projects near the Project Site would create noticeable visual change from existing conditions when considered in combination with the proposed Project and as such, could result in conflicts with scenic quality regulations of applicable community plans.

Under the cumulative scenario, the local development pattern would appear denser and display an increasingly urban character as compared to existing conditions. However, due to the existing urbanized character of the Hollywood Community, the introduction of buildings of greater scale in the visual landscape would not substantially degrade the

visual character or quality of the neighborhood or viewshed. Furthermore, all related projects would be required to comply with the LAMC, including appropriate setbacks and height limits and policies of the underlying community plan. Additionally, due to the location of most cumulative projects in a highly urbanized area of the City, it is likely that some of the related projects would also be located within a TPA, which would exempt projects from significant aesthetic impacts, per California PRC Section 21099. Additionally, due to the location of the majority of cumulative projects in a highly urbanized area of the City, it is likely that some of the related projects would also be located within a TPA, which exempts the potential aesthetic impacts of those projects, per California PRC Section 21099. **Thus, although development of the proposed Project, in combination with the development of the related projects, would result in a general intensification of land uses in an already urbanized area of the City, due to the Project's location in a highly urbanized area and the site-specific nature of cumulative projects, the proposed Project would not combine with any related projects to generate a significant cumulative impact with respect to conflicts with scenic quality regulations. Further, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, scenic quality regulation impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment, and as such, the proposed Project's contribution to cumulative impacts would not be cumulatively considerable with regards to conflicts with scenic quality regulations. Cumulative impacts with respect to conflicts with scenic quality regulations would be less than significant.**

(b) Light and Glare

The geographic context for the analysis of cumulative impacts related to light and glare would include the cumulative development projects located in a proximity that creates shading or potential light and glare impacts upon the same properties as the Project.

As it relates to light and glare, the proposed Project is located within a largely urbanized area of the City, on sites that are already developed. As such, development of the Project, in combination with the related projects, would result in an intensification of land uses in an already urbanized area of the City that currently maintains an elevated level of ambient light and glare. Light generated by the proposed Project would be greater than under existing conditions at Building Sites 1 through 6. As such, the Project and related projects would contribute to ambient light levels within the surrounding area. However, as discussed above, the proposed Project is in a heavily urbanized area and the presence of additional nighttime illumination resulting from the Proposed and related projects would not represent a substantial alteration to the existing nighttime visual environment. Additionally, the proposed Project would incorporate project design features and comply with the LAMC in order to ensure that any potential increases in nighttime lighting as a

result of the Project would not be bright enough to substantially affect nearby sensitive uses. Thus, through adherence to LAMC standards and regulations regarding lighting and reflective materials, which would avoid any such new source of substantial light or glare, the proposed Project would not be cumulatively considerable regarding creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area because: (1) any aesthetics impact the proposed Project may produce cannot be considered a significant impact on the environment under California PRC Section 21099; and (2) adherence to LAMC standards and regulations and incorporation of the above-referenced PDFs regarding lighting and reflective materials would avoid any such new source of substantial light or glare. Project impacts to day and nighttime views due to new sources of light and glare are not considered significant. Project impacts cannot be cumulatively considerable with regards to light and glare impacts, and cumulative aesthetics impacts are not considered significant.

Although development of the proposed Project, in combination with the development of the related projects, would result in a general intensification of land uses in an already urbanized area of the City and would entail the installation of additional sources of lighting and glare, the proposed Project would not combine with any related projects to generate a significant cumulative impact with respect to light and glare. Further, pursuant to California PRC Section 21099(d)(1) and ZI No. 2452, light, glare and shading impacts of an employment center project located within a TPA shall not be considered significant impacts on the environment, and as such the proposed Project's contribution to cumulative impacts would not be cumulatively considerable with regards to light and glare. Cumulative impacts with respect to light and glare would be less than significant.

(2) Mitigation Measures

In accordance with California PRC Section 21099(d)(1) and ZI No. 2452, Project-level and cumulative impacts related to aesthetics would not result in significant impacts; therefore, no mitigation is required.

(3) Level of Significance after Mitigation

In accordance with California PRC Section 21099(d)(1) and ZI No. 2452, Project-level and cumulative impacts related to aesthetics were determined to be not significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains not significant.

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