

## **IV. Environmental Impact Analysis**

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## A. Aesthetics

### 1. Introduction

As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)], which was adopted in 2013, established new rules for evaluating aesthetic and parking impacts under the California Environmental Quality Act (CEQA) for certain types of projects. Specifically, SB 743 (PRC Section 21099(d)) sets forth guidelines for evaluating project impacts for transit-oriented infill projects under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.”<sup>1</sup> The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>2</sup> The City’s Zone Information and Map Access System (ZIMAS) identifies a portion of the Project Site as located within a TPA (Lots 33-37 of Block 13 of Tract 7260 and 10-13 of Block 14 of Tract 7260) while other portions of the Project Site are not currently identified as located within a TPA (Lots 29-32 of Block 13 of Tract 7260). As such, the potential aesthetics impacts of the Project were evaluated in the Initial Study prepared for the Project and are discussed herein.

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<sup>1</sup> PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile 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.” 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.

<sup>2</sup> 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.

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project's potential to have a substantial adverse effect on a scenic vista, the Project's potential to damage scenic resources within a scenic highway, and the Project's potential to create a new source of substantial light and glare were determined to result in no impact or a less-than-significant impact. The Initial Study also determined that the Project could potentially conflict with applicable zoning and other regulations governing scenic quality. Thus, the analysis in this section focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Local plans, policies, and regulations governing scenic quality that are applicable to the Project Site include the City of Los Angeles General Plan Framework Element and Conservation Element, the West Los Angeles Community Plan (Community Plan), the Citywide Urban Design Guidelines, and the Los Angeles Municipal Code (LAMC).

## **2. Environmental Setting**

### **a. Regulatory Framework**

#### **(1) City of Los Angeles General Plan**

The City's General Plan sets forth goals, objectives, and programs to guide land use policies and to meet the existing and future needs of the community. The General Plan consists of a series of elements, including some that are pertinent to a discussion of aesthetics. These include the General Plan Framework Element and the Conservation Element, which are discussed below.

##### *(a) General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework) provides direction regarding the City's vision for future development throughout the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. Although the General Plan Framework 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 Urban Form and Neighborhood Design Chapter of the General Plan Framework 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 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. 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.

An analysis of the Project's consistency with the General Plan Framework is included in the impact analysis below and in Section IV.E, Land Use, of this Draft EIR.

*(b) General Plan Conservation Element*

Section 15 of the General Plan Conservation Element (Conservation Element), adopted in September 2001, establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant landforms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. The Project's consistency with Section 15 of the Conservation Element is discussed in the impact analysis below.

**(2) West Los Angeles Community Plan**

The Project Site lies within the West Los Angeles Community Plan area. The West Los Angeles Community Plan (Community Plan) is one of 35 community plans established for different areas of the City intended to implement the policies of the General Plan Framework.

While the primary aim of the Community Plan is to guide growth and development, some of the Community Plan's objectives pertaining to land use are also related to aesthetic issues. For example, the Community Plan calls for the preservation and enhancement of the varied and distinct residential character of existing residential neighborhoods. The Community Plan also encourages the preservation of existing open space and the preservation and restoration of cultural resources, neighborhoods, and landmarks.

The Project's consistency with applicable policies from the Community Plan that relate to scenic quality is discussed in the impact analysis below.

**(3) Citywide Design Guidelines**

The Citywide Design Guidelines serve to implement the General Plan Framework's urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the General Plan Framework and Community

Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC. The Citywide Design Guidelines incorporate the goals of the City's Walkability Checklist, which was formerly used to assist in the evaluation of a project's conformance with the General Plan. The Project's consistency with the applicable guidelines included in the Citywide Design Guidelines is discussed in the impact analysis below.

#### (4) Los Angeles Municipal Code

Chapter 1 of the LAMC, 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. As provided in Section II, Project Description, of this Draft EIR, the Project Site has a Neighborhood Commercial General Plan land use designation and is zoned R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). The R3 designation permits a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent housing, and assisted living care housing. The C2 designation permits a wide variety of uses, including, but not limited to, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. Height District 1 within the R3 Zone limits the height to 45 feet and the floor-area ratio (FAR) to 3:1. Height District 1VL within the C2 Zone limits the height to 45 feet and two stories (except that there is no restriction on the number of stories for buildings used entirely for residential purposes) and the FAR to 1.5:1. The Project's consistency with the LAMC is evaluated in the impact analysis below.

### **b. Existing Conditions**

#### (1) Scenic Vistas

As discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, a scenic vista is generally described as a panoramic view (visual access to a large geographic area). Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. As described in the Initial Study, due to the highly urbanized and built out surroundings, there are no publicly available scenic vistas of any valued visual resources in the vicinity of the Project Site.

## (2) Scenic Resources with a State Scenic Highway

As discussed in the Initial Study prepared for the Project, the Project Site is not located along a scenic highway as designated by the state. The nearest officially designated state scenic highway is California State Route 2 (SR-2). A portion of SR-2 runs along Santa Monica Boulevard north of the Project Site; however, the portion of the highway that is officially designated as a scenic highway is located approximately 25 miles northeast of the Project Site. The nearest officially eligible (not yet designated) state scenic highway is along California State Route 1 (SR-1), approximately 6 miles west of the Project Site, and the nearest City-designated scenic parkway is along Avenue of the Stars, approximately 0.6 mile northeast of the Project Site.

## (3) Visual Character

### *(a) Project Site*

The Project Site comprises an approximate 2.22-acre site that is currently developed with several multi-family residential buildings and associated structures and parking, and includes a portion of Bellwood Avenue that bisects the Project Site. Specifically, the Project Site encompasses three multi-family residential developments, which include a two-story building located at 10341–10381 Bellwood Avenue; seven, two-story buildings located at 10328–10366 Bellwood Avenue; and six, one-story bungalow court buildings located at 10368–10384 Bellwood Avenue. Landscaping within the Project Site includes 96 ornamental trees and shrubs, including eight street trees located within the portion of Bellwood Avenue proposed to be vacated and realigned, as well as ornamental trees whose trunks are on an adjacent property but have roots and canopies on the Project Site.

### *(b) Surrounding Area*

As shown in the aerial photograph provided in Figure A-2 of Section II. Project Description, the Project Site is located in an urbanized area. The area surrounding the Project Site is characterized by a mixture of low- and mid-rise buildings occupied by a mix of residential and commercial uses. Specifically, the portion of the Project Site located generally north/west of Bellwood Avenue is bounded by the Century Park hotel (approximately four stories and 58 feet in height) to the north, Bellwood Avenue and multi-family residential uses to the east and south, and a small commercial shopping center to the west that includes a cleaners and a smog check station. The portion of the Project Site located east and south of Bellwood Avenue is generally bounded by a Courtyard by Marriott hotel (approximately four stories and 54 feet in height) and Bellwood Avenue to the north, single-family residential uses to the east and south, and a beauty salon to the west.

## (4) Light and Glare

As described in the Initial Study prepared for the Project, the existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed,

urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, streetlamps, and security/parking lighting. Glare sources within the Project Site and vicinity include glass and metal, vehicle and building surfaces.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, except as provided in Public Resources Code Section 21099, 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 within a state scenic highway;***

***Threshold (c): If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality;<sup>3</sup>***

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

As previously discussed, the Initial Study determined that the Project would result in no impact related to the Project's potential to have a substantial adverse effect on a scenic vista and the Project's potential to damage scenic resources within a scenic highway (Thresholds (a) and (b) above). In addition, the Initial Study concluded that the Project would have a less-than-significant impact related to the creation of a new source of substantial light and glare (Threshold (d) above). As such, the analysis below focuses on Threshold (c) listed above. This question was recently added to Appendix G and is therefore not specifically addressed in the 2006 L.A. CEQA Thresholds Guide. However, applicable guidelines and regulations is also a consideration included for the analysis of visual character/visual resources in the 2006 L.A. CEQA Thresholds Guide, consistent with the intent of Appendix G Threshold (c).

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<sup>3</sup> *The Project Site is in an urbanized area. As such, the applicable analysis is whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Threshold (c) includes the following for projects in non-urbanized areas: 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 publicly accessible vantage point.)*

## b. Methodology

The Project Site is located within an urbanized area. As such, in accordance with the threshold set forth in Appendix G of CEQA Guidelines, the analysis discusses whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The determination of whether the Project conflicts with any applicable regulations governing scenic quality is based upon a review of the aforementioned planning and zoning documents that pertain to scenic quality. These include the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, and the LAMC. CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional plan 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.<sup>4</sup>

## c. Project Design Features

The following project design feature would be implemented as part of the Project:

**Project Design Feature PDF A-1:** Glass used in building façades shall be low-reflective or treated with an anti-reflective coating to minimize glare. 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 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?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, due to the highly urbanized and built out surroundings, there are no publicly available scenic vistas of any valued visual resources in the vicinity of the Project Site. **As determined in the Initial Study, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently**

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<sup>4</sup> *Sequoiah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

exist. Therefore, impacts with respect to Threshold (a) would not occur. No further analysis is required.

***Threshold (b): Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, the Project Site is not located along a state scenic highway. **As determined in the Initial Study, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. Therefore, impacts with respect to Threshold (b) would not occur. No further analysis is required.**

***Threshold (c): Would the Project conflict with applicable zoning and other regulations governing scenic quality?***

### (1) Impact Analysis

As previously discussed, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element, the Conservation Element, the West Los Angeles Community Plan, the Citywide Urban Design Guidelines, and the LAMC. The Project's consistency with the general intent of these plans and regulations is provided below.

#### *(a) General Plan*

##### *(i) Framework Element*

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. As provided in Table 1 in Appendix B of this Draft EIR, one of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would replace the existing multi-family residential units with an eldercare facility that would complement the uses surrounding the Project Site. Specifically, the Project would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. As shown in the conceptual renderings provided in Figures II-12 through II-15 in Section II, Project Description, of this Draft EIR, the proposed building would include building fenestration; a variety of surface materials including trowel stucco, composite metal wall panels with wood finish, limestone panels,

and glass; and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In particular, building scale and massing would be defined by varying massing and height components that break up the façade into distinct and offset planes.

The proposed landscaping, both within the Project Site and along the Project's frontage, would further contribute to a visually appealing residential development by providing screening and buffering between the adjacent uses, and would improve the quality of the public realm by promoting pedestrian activity and further activating the street adjacent to the Project. Specifically, the sidewalks along Bellwood Avenue would be enhanced with additional street trees. In addition, as shown in the Landscape Plan provided in Figure II-12 of Section II, Project Description, additional trees would also be planted within the Project Site, with rows of new trees along the western, southern and eastern perimeter of the Project Site. As further discussed in Table 1 in Appendix B of this Draft EIR, the Project would also support the City's policy to encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character. Specifically, proposed signage would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area.

Overall, the Project would not conflict with the applicable objectives and policies that support the goals set forth in the Framework Element regarding scenic quality.

*(ii) Conservation Element*

As previously discussed, Section 15 of the Conservation Element establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant landforms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. As discussed in Table 1 in Appendix B of this Draft EIR, the Project is located within a highly urbanized area and there are no public views of scenic resources in the vicinity of the Project Site. Therefore, the Project would not obstruct or remove access to natural and scenic vistas in the area. Furthermore, the Project would not impact significant landforms or unique scenic features. Therefore, the Project would not conflict with objectives and policies in the Conservation Element regarding obstruction of existing scenic vistas or public views of visual resources.

*(b) West Los Angeles Community Plan*

As provided in Table 2 in Appendix B of this Draft EIR, the Project would not conflict with the applicable objectives and policies that support the goals of the West Los Angeles Community Plan related to scenic quality. Specifically, the Project would not conflict with Policy 1-3.1 requiring architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing residential neighborhoods. The vicinity of the Project Site is developed with a mix of commercial and residential uses. As shown in the aerial photograph provided in Figure II-2 of Section II. Project Description, the Project Site is bounded by the Courtyard by Marriott hotel (approximately four stories and 54 feet in height), and the Century Park hotel (approximately four stories and 58 feet in height) to the north; a small commercial shopping center that includes a cleaners and a smog check station, a beauty salon, and single-family residential uses to the west; and single-family residential uses to the east and to the south. Against this backdrop, the Project would replace the current low-rise and multi-family residential buildings within the Project Site with an eldercare facility 38 feet to 70 feet in height.

The Project would feature a contemporary architectural style that would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In particular, the building's scale is defined by varying massing and height components that break up the façade into distinct and offset planes. Specifically, the building is designed so that the six-story portion is located nearest the commercial uses and four-story hotels to the north. The building steps down in height as it nears the southerly and westerly property lines nearest the residential uses. In addition, due to the surrounding topography, the easterly portion of the building, while technically five stories in height, is only three stories in height when viewed from the elevation of the adjacent properties to the east. Similarly, as properties to the south adjacent to the east wing of the building are at a higher elevation than the Project Site, when looking toward the five-story east wing of the building it appears as four stories. Roof deck terraces are provided at each building level as the building steps up in height to both reduce massing and create green spaces from the ground level to the top of the building. Extensive landscaping that would serve as screening along the perimeter of the Project Site would also be provided at the ground level.

Also, as discussed in Table 1 in Appendix B of this Draft EIR, the Project would not conflict with the design guidelines set forth in the Urban Design Chapter of the Community Plan. In particular, the Project would not conflict with the site planning guidelines regarding multi-family residential uses, to design such uses around a landscaped focal point or

courtyard to serve as an amenity for residents. As shown in Figure II-12 and Figure II-4 of Section II. Project Description, the Project would be constructed around a central courtyard on Level P1 that would be open to the sky through the extent of the building. The central courtyard would provide direct access to common indoor areas, which provide amenities to residents such as dining rooms, a gym, indoor pool and spa, wellness center, and several other activity rooms. Additional terraces would be provided at the ground floor, including a large ground level terrace, the memory care terrace, and the bistro terrace. These terraces would include amenities such as benches and tables, and the memory care terrace would include a lawn. Additional terraces would be provided on levels two through six that would include amenities such as benches, tables, raised planters, and water features.

*(c) Citywide Design Guidelines*

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all objectives will be appropriate in every case. As discussed below, the Project would not conflict with the applicable objectives of the Citywide Design Guidelines for residential and commercial mixed-use projects.

*Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.*

The proposed uses would be within a single building constructed around a central courtyard, which provides easy pedestrian connections within and around the Project Site. The ground floor of the proposed building would serve as the primary entrance to the building and would include two separate lobbies to support independent living/assisted living and memory care services, respectively. Indoor common areas including the dining rooms, the gym, indoor pool and spa, wellness center, and several activity rooms would be located on the first subterranean level (P1). Level P1 would be open to the central courtyard such that the common indoor areas would have direct access to the central outdoor areas. Stairs and elevators would be available from Level P1 to access the ground level above. In addition, the sidewalks along portions of Bellwood Avenue adjacent to the Project Site would be widened and additional street trees would be planted, promoting a safe and accessible pedestrian experience.

*Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.*

Vehicular access to the Project would be provided along Bellwood Avenue. Through public access would be maintained from both sides of Bellwood Avenue, and a vehicle turn-out adjacent to the building's lobby entrance would be provided along with sidewalk and streetscape improvements. Parking would be provided within two subterranean parking levels with access provided from one entry/exit driveway located along Bellwood

Avenue near the northern boundary of the building, separating the vehicular and pedestrian entrances. Access to the existing uses is currently available via five driveways along Bellwood Avenue. The Project would therefore reduce the number of driveways and eliminate existing surface parking areas, thereby reducing the interface between pedestrians and vehicles.

*Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.*

The Project would provide for safe drop-off/pick-up areas and would include a vehicle turnout located adjacent to the Project Site lobby entrance for pick-up and drop-off. Sidewalks along portions of the realigned portion of Bellwood Avenue would be widened and new street trees would be planted. In addition, the sidewalks would continue to provide connections to the commercial uses along Olympic Boulevard. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. A variety of landscaping, including planters and trees, would also be incorporated along the Bellwood frontage. In addition, pedestrian access to the building would also be provided along Bellwood Avenue where the building lobby entrance would be located. An outdoor bistro terrace would be provided adjacent to the lobby entrance, which would provide an active ground floor with pedestrian friendly improvements and actively engage with the street.

*Guideline 4: Organize and shape projects to recognize and respect surrounding context.*

As previously outlined, the Project design would complement the surrounding uses, which primarily consist of commercial and residential uses, and include two hotels, a shopping center, and single-family and multi-family residential uses. Currently, building heights in the surrounding area range from one story single-family residential homes to the east and south of the Project Site, to hotels that are approximately four stories tall to the north and west of the Project Site. The Project would replace three low-rise multi-family residential developments in multiple buildings with a single building ranging in height from 38 feet to 70 feet, or three to six stories. The building would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and respond to the existing scale in the vicinity of the Project Site. In particular, the building's scale is defined by varying massing and height components that break up the façade into distinct and offset planes. Specifically, the building is designed so that the six-story portion is located nearest the commercial uses and four-story hotels to the north. The building steps down in height as it nears the southerly and westerly property

lines nearest the residential uses. In addition, as discussed in Section II, Project Description, of this Draft EIR, there is a grade difference ranging between approximately 14 feet to 42 feet along the southern and eastern boundaries of the Project Site (i.e., Orton Avenue and Keswick Avenue), such that the Project Site is situated below most of the adjacent single-family residential uses. As such, due to the surrounding topography, the easterly portion of the building, while technically five stories in height, is only three stories in height when viewed from the elevation of the adjacent properties to the east. Similarly, as properties to the south adjacent to the east wing of the building are at a higher elevation than the Project Site, when looking toward the five-story east wing of the building it appears as four stories. Roof deck terraces are provided at each building level as the building steps up in height to both reduce massing and create green spaces from the ground level to the top of the building. In addition, extensive landscaping that would serve as screening along the perimeter of the Project Site would also be provided at the ground level.

*Guideline 5: Express a clear and coherent architectural idea.*

The Project would utilize distinguishable design features that would add visual interest while respecting the aesthetic character of the surrounding area. Fundamental to the design concept are the materials that would create the contemporary architectural style that would be designed to visually unify the Project and complement the existing surrounding uses. Building materials for the Project would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels, and glass. Architectural details would be incorporated to enhance scale and interest on the building's façades. The Project design would also alternate different textures, colors, materials, and distinctive architectural treatments as encouraged in the City's Urban Design Guidelines.

*Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.*

The Project would be constructed around a central courtyard on Level P1 that would be open to the sky through the extent of the building. The central courtyard would provide direct access to amenities for the residents including dining, a gym, indoor pool and spa, wellness center, and outdoor kitchenette and barbecue stations, exercise lawn, garden seating area, and flexible lounge seating. Various components and levels of the Project would be integrated by a series of landscaped courtyards and terraces. Additional terraces and courtyards would be provided at the ground floor, including a large ground level terrace, the memory care terrace, and the bistro terrace. These terraces and courtyards would include benches and table seating, raised planters, lawns, and bistro tables. Terraces would also be provided on levels two through six and would include landscaping. Therefore, the Project would provide amenities that provide an inviting and comfortable user experience.

*Guideline 7: Carefully arrange design elements and uses to protect site users*

The Project would provide for safe drop-off/pick-up areas and would include a vehicle turnout located adjacent to the Project Site lobby entrance for pick-up and drop-off. The proposed building would be constructed around a central courtyard that would be open to the sky. The assisted living guest rooms and memory care units would be generally concentrated within the eastern portion of the building, east of the courtyard; and the independent living units would be generally concentrated within the western portion of the building, to the west of the courtyard. The assisted living guest rooms would be located on the second through sixth floors generally within the central and east portions of the building, and the independent living dwelling units would be located on the first through sixth floors generally within the west and central portions of the building. The memory care guest rooms would be located on the first and second floors within the eastern portion of the building and would be separated from the independent living and assisted living components. This arrangement of buildings and uses would facilitate the flow of pedestrian activity within the Project Site. As a result, the Project would provide carefully arranged design elements and uses to Project Site users.

In addition, the Project would reduce the number of driveways and surface parking areas compared to existing conditions to minimize pedestrian-vehicular conflicts. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the commercial buildings.

*(d) Los Angeles Municipal Code*

As discussed in Section IV.E, Land Use, of this Draft EIR, the Project Site is zoned by the LAMC as R3-1-O (Multi Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). The R3 zone permits a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent living and assisted living care housing. The C2 zone permits a wide variety of uses, including, but not limited to eldercare facilities, multiple dwellings, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. As discussed in Section IV.E, Land Use and Planning, of this Draft EIR, while the R3 zone allows for senior independent living and allows for assisted living care housing, it does not permit Alzheimer's/dementia care housing (e.g., memory care housing) or eldercare facilities by right. As such, the Project is requesting an Eldercare Facility Unified Permit pursuant to LAMC Section 14.3.1 to permit an eldercare facility to be located on a lot within the R3-1 and C2-1VL Zones where the eldercare facility does not meet the use, area, height, and setback provisions of the zones.

As it relates to aesthetics and views, the proposed Eldercare Facility Unified Permit would permit the maximum building height of 70 feet for a portion of the proposed building, in lieu of the 45 feet otherwise permitted in the R3-1 and C2-IVL Zones; and relief from transitional height limitations for the portion of the building located within the C2 Zone. The Eldercare Facility Unified Permit would also permit a FAR ranging from 2.77:1 to 3.2:1<sup>5</sup> averaged across the Project Site. However, as discussed throughout the analysis above, the design and location of the building would respond to the various building typologies in the area, and would, thereby, be generally consistent with surrounding development. The proposed Eldercare Facility Use Permit and resulting increase in FAR within portions of the Project Site would not result in a significant impact related to aesthetics or views because the change in scale would be moderated by a high degree of articulation created by fenestration; variations in building planes, rooflines, heights, and façade setbacks and projections; and a variety of surface materials to reduce the visual effect of the height and massing from public vantage points and provide a pedestrian scale adjacent to the public streets. Specifically, the building is designed so that the six-story portion is located nearest the commercial uses and four-story hotels to the north. The building steps down in height as it nears the southerly and westerly property lines nearest the residential uses. In addition, due to the surrounding topography, the easterly portion of the building, while technically five stories in height, is only three stories in height when viewed from the elevation of the adjacent properties to the east. Similarly, as properties to the south adjacent to the east wing of the building are at a higher elevation than the Project Site, when looking toward the five-story east wing of the building it appears as four stories.

With implementation of the requested approvals, impacts related to conflicts with the LAMC would be less than significant.

*(e) Conclusion*

**Based on the discussion above, the Project would not conflict with the zoning and other regulations governing scenic quality, and impacts would be less than significant.**

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<sup>5</sup> *Based on buildable area (as defined in Los Angeles Municipal Code Section 12.03) of approximately 87,421 square feet. FAR is a calculation of the ratio of building square footage to buildable lot area. As the final buildable lot area may vary based on the ultimate configuration and designation of the realigned portion of Bellwood Avenue, the FAR may range from approximately 2.77:1 to 3.2:1; however, the square footage of the building would not change.*

## (2) Mitigation Measures

Project-level impacts related to a conflict with applicable zoning and other regulations governing scenic quality would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts related to a conflict with applicable zoning and other regulations governing scenic quality were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

### ***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?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, with adherence to existing LAMC regulations, construction of the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area. Additionally, any glare generated during construction would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area. **As determined in the Initial Study, Project-related construction activities would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant. No further analysis is required.**

As also discussed in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, sources of exterior lighting incorporated into the Project would include: low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes; and low-level lighting to accent signage, architectural features, and landscaping elements. All Project lighting would be designed to minimize light trespass from the Project Site and comply with all LAMC requirements and standards and all new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

With respect to glare, building materials for the Project would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels, and

glass. In addition, all parking would be provided in two subterranean parking levels. As such, there would be limited potential from glare associated with parked vehicles. Glass used in building facades would also be low reflective or treated with an anti-reflective coating to minimize glare. Further, the Project would incorporate additional perimeter landscaping to minimize views of the Project Site and any associated glare.

**As determined in the Initial Study, Project operation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts with respect to Threshold (d) would be less than significant. No further analysis is required.**

## **e. Cumulative Impacts**

### **(1) Impact Analysis**

As indicated in Section III, Environmental Setting, of this Draft EIR, there are six related projects in the vicinity of the Project Site. The nearest related project to the Project Site is Related Project No. 6, the proposed Fox Studios Master Plan, which is located approximately 0.2 mile east of the Project Site. This related project proposes commercial uses, which may include creative office space, new stages, and facility and utility support spaces. Related Project No. 6 would be confined to the boundaries of the existing Fox Studios and, due to the distance from the Project Site, could not combine with the Project to affect scenic quality in the immediate vicinity of the Project Site. As with the Project, Related Project No. 6 would also be required to comply with relevant regulations governing scenic quality through review by City regulatory agencies, and would be subject to CEQA review. In addition, as the Project would generally not conflict with applicable land use plans and policies that govern scenic quality, the Project would not incrementally contribute to cumulative inconsistencies with respect to such plans and policies. **Thus, Project impacts with regard to consistency with regulations governing scenic quality would not be cumulatively considerable, and cumulative impacts would be less than significant.**

### **(2) Mitigation Measures**

Cumulative impacts to aesthetics would be less than significant. Therefore, no mitigation measures are required.

### **(3) Level of Significance After Mitigation**

Cumulative impacts with regard to aesthetics were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.