IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

This section describes the existing visual setting of the Project site and vicinity within the context of the surrounding community; identifies applicable laws, regulations, guidelines and policies relating to aesthetics; and evaluates potential aesthetic impacts related to implementation of the Project, including potential impacts to views of scenic vistas, the Project's consistency with regulations governing scenic quality, and the Project's potential to create a new source of substantial light and glare. These topics are described in more detail below. The Project's potential impact related to potentially damaging scenic resources within a scenic highway was fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, and determined to result in no impact. This analysis included in the Initial Study prepared for the Project is summarized below.

a. Scenic Vistas

The term "scenic vista" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The City of Los Angeles (City) recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

b. Scenic Quality

Scenic quality refers to the visual appeal of an area and is informed by features that contribute to overall aesthetic character. Aesthetic features may include unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The City has plans, policies and regulations that are relevant to the assessment of scenic quality, such as requirements for street trees, building setbacks, building heights, exterior lighting and signage.

d. Light and Glare

Sources of artificial light that operate during evening and nighttime hours may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses, such as residences and hotels, are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources.

Glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Activities, such as driving, and land uses, such as parks and residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities/uses.

2. Environmental Setting

a. Regulatory Framework

There are several laws, regulations, as well as local land use plans that include policies, requirements, and guidelines that relate to aesthetics at the state and local levels. As described below, these laws, regulations and plans include the following:

- Senate Bill No. 743
- Assembly Bill 1560
- General Plan Framework Element
- General Plan Conservation Element
- Palms–Mar Vista–Del Rey Community Plan
- Redevelopment Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) Senate Bill No. 743

Senate Bill (SB) 743, codified within the Public Resources Code (PRC) Section 21099 et. seq., states that "Aesthetic (…) 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." (PRC Section 21099(d) (1)). If a project meets these conditions, aesthetic impacts associated with the project would not be considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, ZI No. 2452 requires that projects in transit priority areas (TPA) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality.

Evaluation of a project's physical impacts associated with aesthetics is not required for an exempt project and is provided for informational purposes only. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in the Initial Study prepared for the Project included in Appendix A of this Draft EIR.

Pertinent definitions applicable to PRC Section 21099(a) and the Project include:

- "Infill site" means 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.

- "Transit priority area" means an area within one-half 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.

- "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.

- "Major transit stop" is defined by PRC Section 21064.3 to mean 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.

Projects that meet the criteria set forth in Public Resources Code, section 21099(d), are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of significance related to aesthetics.

(b) Assembly Bill 1560

Assembly Bill 1560, codified at PRC Section 21060.2, supplements PRC 21064.3 by defining "bus rapid transit" and "bus rapid transit station" as it relates to a major transit stop. Specifically, "bus rapid transit" means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

- Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- Transit signal priority.
- All-door boarding.
- Fare collection system that promotes efficiency.
- Defined stations.

Lastly, "bus rapid transit station" is defined within PRC 21060.2 as a clearly defined bus station served by a bus rapid transit.

(2) City of Los Angeles

(a) General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan.[1] The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter

[1] *City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996, and readopted August 8, 2001.*

to guide the design of future development.[2] Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[3]

Chapter 5 of the Framework Element, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods.[4] "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. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City.[5] The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.H, Land Use and Planning, of this Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project's consistency with the Framework Element is provided in Section IV.H, Land Use and Planning, of this Draft EIR.

(b) General Plan Conservation Element

The City's various landforms and scenic vistas are described in the General Plan Conservation Element. The hills and mountains within the City, and the Los Angeles River and is associated tributaries and floodplains, are identified as prominent topographic features.

---

[2] *City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 5, originally adopted December 11, 1996, and readopted August 8, 2001.*

[3] *City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, Objective 5-5, originally adopted December 11, 1996, and readopted August 8, 2001.*

[4] *City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, originally adopted December 11, 1996, and readopted August 8, 2001.*

[5] *City of Los Angeles Department of City Planning, General Plan Framework, Executive Summary, originally adopted December 11, 1996, and readopted August 8, 2001.*

The Conservation Element defines scenic vistas or vistas as the "panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features."[6]

(c) Community Plans

The 35 Community Plans established throughout the City collectively comprise the Land Use Element of the City's General Plan. Community plans are intended to implement the policies of the Framework Element. Community plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land uses.

The Palms–Mar Vista–Del Rey Community Plan (Community Plan) was adopted on November 20, 1985 and updated in 1997 with the specific purpose to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Palms–Mar Vista–Del Rey community within the larger framework of the City. In addition, the 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 Palms–Mar Vista–Del Rey Community Plan is one of the four Westside community plans being updated by the City of Los Angeles Department of City Planning.

Chapter V, Urban Design, of the Community Plan provides design policies for individual projects, such as commercial, industrial, and multiple residential projects. These design policies establish the minimum level of design and address design issues for parking and landscaping. In addition, the Urban Design Chapter includes community design and landscaping guidelines for streetscape improvements and landscaping in public spaces and rights-of-way.

While the primary aim of the Community Plan is to guide growth and development, a few of the Community Plan's objectives pertaining to land use are also related to aesthetic issues. The Project's consistency with applicable policies from the Community Plan that relate to aesthetics is included in the impact analysis below and in Section IV.H, Land Use and Planning, of this Draft EIR.

[6] *City of Los Angeles Department of City Planning, General Plan Conservation Element, originally adopted September 26, 2001.*

(d) Redevelopment Plans

State law ABx1-26 dissolved all California redevelopment agencies, effective October 2011. The legislation prevents redevelopment agencies from engaging in new activities. However, ABx1-26 does not abolish the existing Redevelopment Plan. The land use regulations in the Redevelopment Plan remain in effect and continue to be administered by the CRA/LA.[7] The Project Site is not located in a Redevelopment Plan area.[8]

(e) Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) regulates all aspects of building development in the City, including aesthetic aspects, such as lighting and signage. The code sections applicable to aesthetic concerns include the following:

Lighting is regulated by various chapters within the LAMC. The code 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 I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- 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.

    1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.

---

[7] *CRA/LA, Memorandum dated June 12, 2012, Attachment A, Resolution No. 16 adopted June 21, 2012.*

[8] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed March 6, 2023.*

2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.

3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[9]

(f) Citywide Design Guidelines

Adopted in 2019, the Citywide Design Guidelines establishes ten guidelines and various best practices to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. The Citywide Design Guidelines are organized around one of three design approaches and consist of the following general design direction:

- Pedestrian-First Design
  - Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
  - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
  - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.
- 360 Degree Design
  - Guideline 4: Organize and shape projects to recognize and respect surrounding context.
  - Guideline 5: Express a clear and coherent architectural idea.
  - Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
  - Guideline 7: Carefully arrange design elements and uses to protect site users.

[9] *Certain exceptions apply related to frosted light sources emitting 800 lumens or less, other sources emitting 800 lumens or more not visible to persons on other residential properties, tennis or paddle tennis courts conforming to certain standards, certain temporary decorative lights, emergency lights, agency controlled light sources, and light sources a minimum distance of 2,000 feet from residential uses.*

- Climate-Adapted Design
  - Guideline 8: Protect the site's natural resources and features.
  - Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.
  - Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Citywide Design Guidelines apply to all new development and substantial building alterations that seek a discretionary action for which the Department of City Planning has design authority. Projects that are subject to the Citywide Design Guidelines will need to include as part of their application a written statement that describes how their project complies with each of the ten guidelines. Compared to the Zoning Code and other regulations governing the development of a particular property, the Citywide Design Guidelines are intended as a more flexible, less prescriptive means of shaping proposed projects and conveying general design expectations.

b. Existing Conditions

(1) Scenic Vistas

A scenic vista is generally described as a panoramic view (visual access to a large geographic area) of visual resources.[10] Examples of panoramic views of visual resources might include an urban skyline, valley, mountain range, the ocean, or other water bodies. Due to the density of intervening development in the vicinity of the Project site, long range views of visual resources are not available from the Project site and the surrounding properties. Thus, large panoramic views of visual resources are not available in the vicinity of the Project site.

(2) Visual Character

(a) Project Site

The Project site is comprised of approximately 4.51 acres, and is located within the southern edge of the Palms–Mar Vista–Del Rey Community Plan area. Photographs of the Project site from the adjacent public rights-of-way (i.e., Beatrice Street and Jandy Place) are provided in Figure IV.A-1 through Figure IV.A-7 on pages IV.A-10 through IV.A-16, respectively. As illustrated in the photographs, the Project site is currently occupied by

[10] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, A.2. Obstruction of Views, p. A.2-1.*

Figure IV.A-1
Views of Project Site Along Beatrice Street

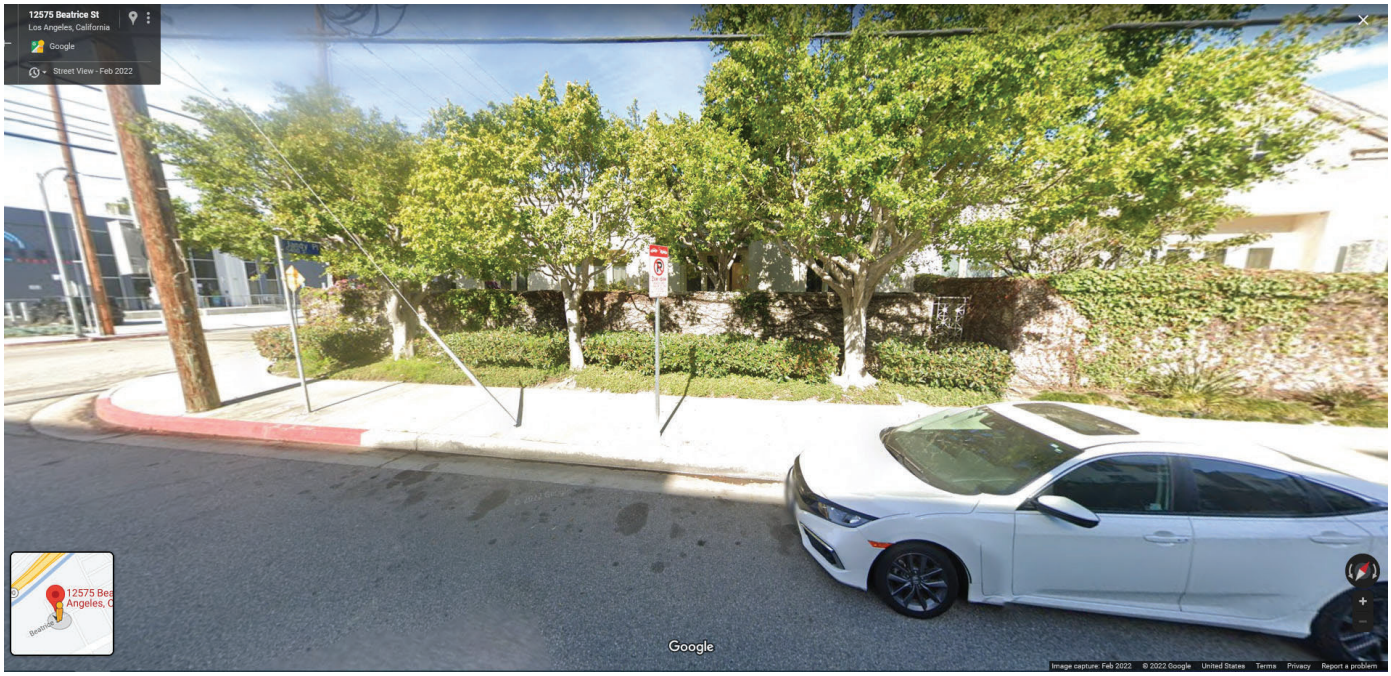
Source: Eyestone Environmental, 2023.

Figure IV.A-2
Views of Project Site Along Beatrice Street

Source: Eyestone Environmental, 2023.

Figure IV.A-3
Views of Project Site Along Beatrice Street

Source: Eyestone Environmental, 2023.



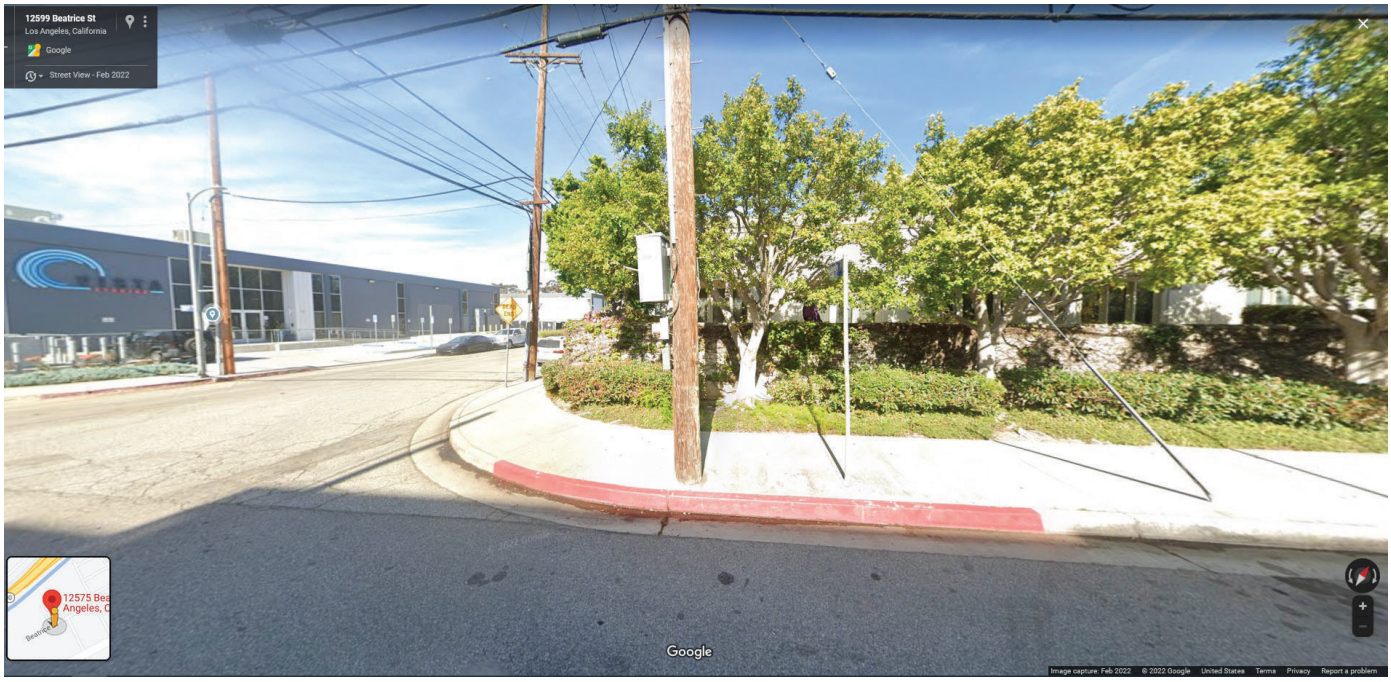


Figure IV.A-4
Views of Project Site Along Beatrice Street and Jandy Place

Source: Eyestone Environmental, 2023.

Figure IV.A-5
Views of Project Site Along Beatrice Street and Jandy Place

Source: Eyestone Environmental, 2023.

Figure IV.A-6
Views of Project Site Along Jandy Place

Source: Eyestone Environmental, 2023.

Figure IV.A-7
Views of Project Site Along Jandy Place

Source: Eyestone Environmental, 2023.

four structures, including a two-story office building located along the eastern portion of the Project site, facing Beatrice Street (as shown in Figure IV.A-1 on page IV.A-10); a single-story office building located on the western portion of the Project site, at the corner of Beatrice Street and Jandy Place (as shown in Figure IV.A-3 on page IV.A-12); and two accessory structures within the northern portion of the Project site near the single-story office building. The existing buildings on the Project site range in height from approximately 20 to 26 feet.

The Project site also contains surface parking areas located between the two office buildings (as shown in Figure IV.A-2 on page IV.A-11) and along the eastern boundary of the Project site. Vehicular and pedestrian access to the Project site is provided along Beatrice Street and along Jandy Place, with one driveway on Jandy Place and four driveways on Beatrice Street. Landscaping within the Project site includes ornamental landscaping, including trees, hedges and shrubs, and hardscape features. Street trees and trees within the Project site consist of two non-native species, including 51 tipuana trees and eight ficus trees that are not subject to the City's Protected Tree Regulations, plus two sycamore trees, located in the southeast corner of the Project site, that are protected, and which would be retained as part of the Project.[11] All trees have trunk diameters measuring 8 inches or larger. No protected shrubs are located on the Project site.

As illustrated in the photographs, the overall visual character of the Project site is somewhat disparate, with varying architectural styles between the two office buildings located along Beatrice Street and a lack of uniform landscaping, as illustrated by Figure IV.A-1 and Figure IV.A-4 on page IV.A-13, resulting in a visually disconnected site. Varying streetscape frontages and fencing along the perimeter of the Project site further creates a disparate and closed off streetscape. Specifically, as viewed from Beatrice Street, east of and up to Westlawn Avenue (Figure IV.A-1 on page IV.A-10), the Project site is characterized by a two-story office building, a perimeter fence that extends along Beatrice Avenue, gated surface parking areas and landscaping primarily consisting of various trees interspersed throughout the area between the building and the perimeter fence. On the west portion of Beatrice Street, west of Westlawn Avenue (Figure IV.A-3), the visual character of the Project site is characterized by a one-story office building mainly hidden from view by a vine-covered wall and trees. The visual character of the Project site from Jandy Place (Figure IV.A-5 on page IV.A-14 and Figure IV.A-6 on page IV.A-15) is dominated by landscaped hedges and trees, which extend along the western boundary of the Project site. Above-ground electrical poles and wires extend along the perimeter of the

[11] *The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program. In addition, protected status has been expanded to include two species of native shrubs that include Mexican Elderberry and Toyon and excludes shrubs grown or held for sale by a licensed nursery.*

Project site on Beatrice Avenue and Jandy Place. The north and east sides of the Project site are not adjacent to any public rights-of-way, and therefore, are not highly visible from surrounding public areas.

(b) Surrounding Area

As shown in Figure IV.A-8 on page IV.A-19, the area surrounding the Project site is fully developed with a mix of office, light industrial, and manufacturing uses with a multi-family residential development located south of the Project Site across Beatrice Street (west of Westlawn Avenue). As with the Project site, the visual character of the surrounding area is varied, with a wide array of building types and heights in the immediate Project vicinity ranging from one to five stories. Specifically, two-story office uses are located immediately adjacent to the Project site on the north, with the Centinela Creek Channel and State Route 90 located further north. Adjacent to the eastern side of the Project site are two 2-story commercial office/industrial buildings and a five-level parking structure on the Project site's northeastern side. South of the Project site, across Beatrice Street, is the five-story Avalon Playa Vista multi-family residential building (west of Westlawn Avenue) and a two-story office building (east of Westlawn Avenue). Further south of the Project site, across Jefferson Boulevard, is the large mixed-use office, retail, and residential community of Playa Vista. Jefferson Boulevard is developed with a variety of mid-rise office and multi-family residential buildings that generally range in height from five- to seven-stories. West of the Project site, across Jandy Place, are two- to three-story studio/office uses and an associated surface parking area.

(3) Light and Glare

Given the types of uses in the vicinity of the Project site, existing nighttime light levels are characterized as medium. Artificial nighttime light levels are associated with the surrounding office, light industrial, and residential uses, which typically utilize moderate levels of exterior lighting for security, signage, parking, architectural building highlighting, and landscaping. Other exterior lighting sources include pole-mounted streetlights, as well as vehicle headlights along adjacent streets (i.e., Beatrice Street, Westlawn Avenue, and Jandy Place). Interior lighting from windows of the surrounding commercial and residential uses also contribute to the ambient artificial light levels in the area. Existing light sources on the Project site include light poles in the surface parking areas, signage lighting for the existing buildings, and exterior building lighting.

Daytime glare is generally associated with reflected sunlight from buildings with highly reflective surfaces such as glass, shiny surfaces, and metal. The existing buildings on the Project site presently do not generate substantial glare since most of the building façades have stucco or painted finishes and low reflectivity windows. Furthermore, the perimeter fencing, hedges, and landscaping along the surrounding roadways limits glare

Photo 1: Beatrice Street–Looking East from Jandy Place

Photo 2: Beatrice Street–Looking West from Westlawn Avenue

Figure IV.A-8
Views of Surrounding Area

Source: Eyestone Environmental, 2021.

potential. The Project site also includes surface parking lots with minimal sources of glare, such as daytime glare emanating from sunlight reflecting off parked vehicles within the Project site. However, these glare sources are not considerable in the context of the urban environment.

In the immediate vicinity of the Project site, the nearest off-site receptors that are considered sensitive relative to light and glare include existing multi-family residential uses within the Avalon Playa Vista multi-family residential building south of the Project site across Beatrice Street (west of Westlawn Avenue). Motorists traveling along roadways in the vicinity of the Project site may also be sensitive to daytime glare.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to aesthetics if it would:

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

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; or

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 publicly accessible vantage point.) If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality;[12] or

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

---

[12] *As part of the 2018 State CEQA Guidelines update, the prior Aesthetics Threshold (c) regarding a project's effects on visual character and quality, which was evaluated in the MND for the Project, was modified to instead consider whether a project would conflict with zoning and other regulations governing scenic quality. However, the judgment in Karney Management v. City of Los Angeles et al. ordered an EIR to be prepared to analyze potential impacts related to visual character and quality. Therefore, the analysis included in this Draft EIR addresses both whether the Project would conflict with applicable zoning and other regulations governing scenic quality (new Threshold (c)) and whether the Project would substantially degrade the existing visual character or quality of the Project site and its surroundings (prior Threshold (c)).*

Additionally, based on the judgment in *Karney Management v. City of Los Angeles et al.*, the analysis included in this Draft EIR also addresses the prior Threshold (c) of whether the Project would substantially degrade the existing visual character or quality of the Project site and its surroundings.

As previously discussed, the Initial Study prepared for the Project, and included as Appendix A of this Draft EIR, determined that the Project would result in no impact related to the Project's potential to substantially damage scenic resources within a scenic highway (Threshold (b)). For the remaining thresholds, the analysis utilizes factors and considerations identified in the City's 2006 LA CEQA Thresholds Guide, as appropriate, to assist in answering these Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate the relevant thresholds outlined above:

(1) Scenic Vistas

- 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);
- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- 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.

(2) Regulations Regarding Scenic Quality

- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements; and
- Applicable guidelines and regulations.

(3) Visual Character

- 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 features that represent the area's valued aesthetic image; and
- The degree to which the project would contribute to the area's aesthetic value.

(4) 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

(1) Scenic Vistas

The analysis of scenic vistas evaluates the changes to existing views that may result from development of the Project. The intent of the analysis is to determine if view resources are visible in the Project area and whether visual access to such resources would be blocked or diminished as a result of the Project. In general, views are closely tied to topography and distance from a view resource. The identification of available views within the Project area was accomplished through field surveys, photographic documentation, and topographic analysis. The analysis is based on the Project's characteristics, particularly building height and massing, as well as landscaping that may alter a scenic vista.

The *L.A. CEQA Thresholds Guide* provides that the analysis of Project impacts to visual resources should address views from public places such as designated scenic highways, corridors, parkways, roadways, bike paths, and trails. To determine whether a potential view impact would occur, a five-step process is used to weigh several considerations, as follows:

- Step 1: Define the view resources that could be affected by Project development. Resources considered include both distant natural features and

proximate man-made/urban features within a reasonable geographic scope around the Project site (i.e., could be viewed in conjunction with the Project site).

- Step 2: Identify the potential obstruction of valued view resources as a result of development of the Project site.

- Step 3: Evaluate whether a potential obstruction would substantially alter the view. The "substantiality" of an alteration in views is somewhat subjective and dependent on many factors. An obstruction in the view of a particular view resource is considered substantial if it exhibits all of the following traits: (1) the area viewed contains a valued view resource; (2) the obstruction of the resource covers more than an incidental/small portion of the resource; and (3) the obstruction would occur from a public vantage point.

- Step 4: Consider whether the Project includes design features that offset the potential alteration or loss of views of a particular view resource.

- Step 5: Consider whether the view blockage is permanent, as viewed from a scenic vantage point; or whether the blockage would be of limited duration, such as when viewed from a moving vehicle or temporary blockages associated with construction activities.

(2) 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 planning and zoning documents that pertain to scenic quality. Accordingly, the analysis of the Project's consistency with regulations governing scenic quality is based on the local plans, policies, and regulations that address aesthetic-related topics. The regulations that are applicable to the Project site include the City of Los Angeles General Plan Framework Element and Conservation Element, the Palms–Mar Vista–Del Rey Community Plan, the Citywide Urban Design Guidelines, Los Angeles Municipal Code, and Title 24 of the California Code of Regulations. 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.[13]

[13] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

(3) Visual Character

Based on the Project's physical aspects in light of the proposed site plan, landscape plan, building elevations, conceptual renderings, and other Project design information, the analysis compares future conditions to existing conditions. The analysis also takes into account the proposed project design features. The analysis is based on the following:

- Step 1: Describe the aesthetic characteristics and design of the proposed building within its urban context. Consider factors such as aesthetic character and quality, massing and scale, setbacks and open space that may be anticipated on the basis of the Project's design features.

- Step 2: Compare the expected appearance of the Project site after Project implementation to the existing site appearance and character of adjacent uses and the character of the surrounding vicinity and determine whether and/or to what extent a change of the visual character of the area could occur (considering factors such as the blending/contrasting of new and existing buildings, density, height, bulk, setbacks, signage, architectural styles, etc.); and

- Step 3: Compare the anticipated appearance of the Project to standards within existing adopted plans and policies which are applicable to the Project and the Project site, including any zone changes or variances (regulatory analysis).

(4) Light and Glare

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient lighting conditions in the Project area. The analysis evaluates the Project's proposed light and glare sources and the extent to which Project lighting may spill off the Project site or illuminate the night sky, thereby affecting off-site light-sensitive uses. The analysis also describes the affected street frontages, the direction in which light would be focused, and the extent to which the Project would illuminate off-site sensitive land uses. In addition, the analysis considers the potential for sunlight to reflect off of building surfaces (glare) and the extent to which such glare could interfere with the operation of motor vehicles or other activities.

c. Project Design Features

The following project design features consist of best practices and design preferences included as part of the Project related to aesthetics.

Project Design Feature AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project site to screen construction activity from view at the street level.

Project Design Feature AES-PDF-2: The Project Applicant 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 postings and of uniform paint color or graphic treatment) throughout the construction period.

Project Design Feature AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent properties, the public right-of-way, or from above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

Project Design Feature AES-PDF-4: New on-site utilities that may be required to serve the Project will be installed underground.

Project Design Feature AES-PDF-5: All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or the public right-of-way.

Project Design Feature AES-PDF-6: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order 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 Energy Code requirements will be permitted.

Project Design Feature AES-PDF-7: Above-grade parking will be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.

Project Design Feature AES-PDF-8: The applicant will plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.

d. Analysis of Project Impacts

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

(1) Impact Analysis

As previously discussed, a scenic vista is a panoramic view of a valued visual resource. As discussed in Section II, Project Description, of this Draft EIR, the Project

vicinity is fully developed with a mix of low- to mid-rise office, light industrial, and manufacturing uses with one multi-family residential structure west of Westlawn Avenue. Specifically, adjacent to the eastern side of the Project site are two-story commercial office/industrial buildings. A five-level parking structure is located adjacent to the northeast of the Project site and the Centinela Creek Channel and State Route 90 are located further north of the Project site. South of the Project site, across Beatrice Street, is a five-story multi-family residential building (west of Westlawn Avenue) and a two-story office building (east of Westlawn Avenue). Further south of the Project site, across Jefferson Boulevard, is the large mixed use office, retail and residential community of Playa Vista. Jefferson Boulevard is lined with a variety of mid-rise office and multi-family residential buildings that generally range in height from five- to seven stories.

Due to the highly urbanized and built out surroundings, publicly available scenic vistas of valued visual resources in the vicinity of the Project site are not available adjacent to the Project site. Thus, due to the urbanized nature of the area and the lack of access to scenic vistas, the Project would not block or obstruct views of visual resources. **Therefore, development of the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to a substantial adverse effect on a scenic vista would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to a substantial adverse effect on a scenic vista were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than 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 summarized 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, 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, and no impacts with respect to Threshold (b) would occur.**

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 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?

(1) Impact Analysis

The Project site is located in an urbanized area. As such, this analysis considers whether the Project would conflict with applicable zoning and other regulations governing scenic quality. As previously discussed, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project site, including the City of Los Angeles General Plan Framework Element, the Conservation Element, the Palms–Mar Vista–Del Rey Community Plan, the Citywide Urban Design Guidelines, the LAMC, and the California Code of Regulations, Title 24. The Project's potential to conflict with these plans and regulations is analyzed 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 several policies and objectives that address various design-related elements of projects. As provided in Table IV.A-1 on page IV.A-28, the Framework Element includes goals, policies, and objectives regarding the scale and character of neighborhoods (Policy 3.2.4 and Objective 4.3), the quality of development and the public realm (Objective 5.5), signage (Policy 5.8.4). and issues related to lighting (Chapter 9).

The Project would be designed to create a visually unified site with the new building designed to complement the existing surrounding uses. The Project proposes the development of a new eight-story office building that would include 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The existing structures at 12575 Beatrice Street would be removed while the existing office building at 12541 Beatrice Street would be retained. As discussed in Table IV.A-1, while the Project would increase the height, density, and mass of on-site structure as compared to existing conditions, it would include siting, design, and landscape elements that would enhance the overall character of the Project site and the immediate area, and improve the quality of the public realm. This would be accomplished by locating the Project's tallest element adjacent to the existing five-story multi-family residential development across Beatrice Street (west of Westlawn Avenue). Jefferson Boulevard, south of the Project site, is developed with a variety of mid-rise office and multi-family residential buildings that generally range in height

Table IV.A-1
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Would the Project Conflict?
General Plan Framework Element Land Use Chapter (Chapter 3)	
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	**No Conflict.** The Project site has a Light Industrial land use designation in the Palms–Mar Vista–Del Rey Community Plan and is zoned M2-1 (Light Industrial, Height District 1) pursuant to the LAMC. The immediate Project vicinity is currently developed with a mix of office and light industrial uses, with one adjacent multi-family residential building with residential uses. The Project would develop a new eight-story commercial office building comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. As part of the Project, an existing office building in the eastern portion of the Project site would be retained. The Project would increase the height, density, and mass of on-site structures as compared to existing conditions but would be sited and designed to maintain the prevailing scale and character of the surrounding area. Specifically, the Project's tallest elements would be located in the western portion of the Project site. In addition, design elements would be incorporated into the Project that would further serve to integrate the Project with and enhance the surrounding area. The massing of the new building would be offset by the retention of the existing two-story office building on the Project site as part of an integrated campus. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would vary the mass and scale of the Project. Pedestrian-scaled Project frontages, ground level commercial uses, landscaping, open space, and streetscape improvements would further improve the pedestrian experience and integrate the Project with the surrounding uses, and would enhance the character of the surrounding commercial area.
General Plan Framework Element Housing Chapter (Chapter 4)	
Objective 4.3: Conserve scale and character of residential neighborhoods.	**No Conflict.** The Project site is in a predominantly commercial and industrial area. As described in the discussion for Policy 3.2.4 above, the Project would employ siting, design, and landscaping elements that would respond to the scale and character of the surrounding uses, including the adjacent five-story multi-family residential uses. The new eight-story building would be located on the western portion of the Project site, where the surrounding buildings are more varied in terms of use and scale, including five-story structures. The Project would step down in size and scale modulating in height from the proposed 135-foot structure on the western portion of the Project site to the existing 26-foot office building on the eastern portion of the Project site. Building scale and massing would be defined by varying massing and height components that would break up the façade into distinct and offset planes. Additional design

Table IV.A-1 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Would the Project Conflict?
	elements, including landscaped terraces, multiple wall planes, varying rooftop design, and the use of complementary surface materials, would further integrate the Project with the surrounding uses. In addition, pedestrian-scaled Project frontages with ground level commercial uses, landscaping, and pedestrian amenities would also contribute to the overall visual character of the site and its integration with the surrounding area. Therefore, the Project would conserve the scale and character of residential neighborhoods and would not conflict with this objective.
General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The Project would activate and improve the public realm along the Project site and within the surrounding vicinity by providing ground-floor commercial uses, attractive street-level landscaping, bicycle parking for visitors, and public gathering spaces and amenities. Specifically, the Project would include a new landscaped seating area along Jandy Place, which is proposed to provide streetscape improvements, including pedestrian seating.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	**No Conflict.** Proposed signage would be appropriately scaled and aesthetically compatible with the architectural character of the Project site and in compliance with the requirements of the LAMC. As described in Section II, Project Description, of this Draft EIR, proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and vestibules. No off-site signage or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights.
General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)	
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	**No Conflict.** Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project site and would comply with all LAMC requirements. 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

Table IV.A-1 (Continued)
Applicable Goals, Objectives, and Policies of the General Plan

Goal/Objective/Policy	Would the Project Conflict?
	properties.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	**No Conflict.** Proposed lighting would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare.
Policy 9.40.1: Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	**No Conflict.** Refer to the discussion for Goal 9P above.
Policy 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	**No Conflict.** Refer to the discussion for Goal 9P above. In addition, the Project would provide sufficient lighting in parking areas to maximize visibility and reduce areas of concealment. There would also be sufficient lighting along walkways to facilitate pedestrian orientation and clearly identify a secure route between the parking levels and entry into the building.
General Plan Conservation Element	
Section 5 – Cultural and Historical	
Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	**No Conflict.** As analyzed in the Initial Study prepared for the Project and included as Appendix A of this Draft EIR, there are no identified historic resources located on or adjacent to the Project site. Thus, the Project would not impact important cultural and historical sites or resources.
Section 15 – Land Form and Scenic Vistas	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	**No Conflict.** The Project is located in an area that is highly urbanized with built out surroundings. Therefore, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project site are not available. As such, the Project would not obstruct or remove access to natural and scenic vistas.

Project consistency with additional Framework Element goals, objectives, and policies is analyzed in Section IV.H, Land Use and Planning, of this Draft EIR.

Source: Eyestone Environmental, 2023.

from five to seven stories. In addition, design elements would further serve to integrate the Project site with the surrounding area. For example, the proposed building would step down in size and scale modulating in height from the proposed 135-foot structure on the western portion of the Project site to the existing 26-foot office building on the eastern portion of the Project site.

In addition to modulation in building heights, the massing of the new building would be further offset by the retention of the existing two-story office building on the Project site as part of an integrated campus with varied heights. The new building would also incorporate variation in floor plate size, pedestrian friendly ground level setbacks up to 20 feet from property line, and the stepping back of upper stories that would break up the façade into distinct and offset planes. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would reduce the Project mass.

Pedestrian-scaled Project frontages, ground level commercial uses, and landscaping, open space, and streetscape improvements would further integrate the Project site with the surrounding uses and improve the quality of the public realm by promoting pedestrian activity and further activating the streets in the vicinity of the Project site. In addition, proposed signage would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area. Thus, the Project would not conflict with the objectives and policies of the Land Use Chapter, Housing Chapter, and Urban Form and Neighborhood Design Chapter of the Framework Element regarding scenic quality.

As further discussed in Table IV.A-1 on page IV.A-28, the Project would also not conflict with the goals, policies, and objectives contained in the Infrastructure and Public Services chapter of the Framework Element governing scenic quality related to lighting. The Project would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project site. Project lighting would be designed to minimize light trespass from the Project site and would comply with all LAMC requirements. 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.

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

(b) Palms–Mar Vista–Del Rey Community Plan

As provided in Table IV.A-2 on page IV.A-32, the Project would not conflict with the applicable objectives and policies that support the goals of the Community Plan related to scenic quality. Specifically, the policies address issues associated with compatibility, architectural character, and landscaping and streetscape improvement. As described above, the vicinity of the Project site is developed with a mix of low- to mid-rise light

Table IV.A-2
Applicable Goals, Objectives, and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
Commercial	
Policy 2-1.4: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.	**No Conflict.** Design elements described below would serve to achieve a high level of quality, distinctive character and the compatibility of the Project with the surrounding area. The massing of the new building would be offset by the retention of the existing low scale building on the site as part of an integrated campus with varied heights. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would reduce the Project mass. Pedestrian-scaled Project frontages, ground level commercial uses, and landscaping, open space, and streetscape improvements would further integrate the Project site with the surrounding uses and improve the quality of the public realm by promoting pedestrian activity and further activating the streets in the vicinity of the Project site. In addition, proposed signage would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area. The Project would tie previously disconnected lots together to create an integrated creative office campus that would add a distinctive character to the area. The proposed building would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses. Pedestrian-scaled amenities such as seating and gathering areas and ground level commercial uses would further add to the Project's character and compatibility with surrounding uses.
Policy 2-3.1: Require that the design of new development be compatible with adjacent development, community character and scale.	**No Conflict.** The area surrounding the Project site is fully developed with a mix of office, light industrial, and manufacturing uses with a multi-family residential development located south of the Project Site across Beatrice Street (west of Westlawn Avenue). As with the Project site, the visual character of the surrounding area is varied, with a wide array of building types and heights in the immediate Project vicinity ranging from one to five stories. Specifically, two-story office uses are located immediately adjacent to the Project site on the north, with the Centinela Creek Channel and State Route 90 located further north. Adjacent to the eastern side of the Project site are two 2-story commercial office/industrial buildings and a five-level parking structure on the Project site's northeastern side. South of the Project site, across Beatrice Street, is the five-story Avalon Playa Vista multi-family residential building (west of Westlawn Avenue) and a two-story office building (east of Westlawn Avenue). Further south of the Project site, across Jefferson Boulevard, is the large mixed-use office, retail, and residential community of Playa Vista. Jefferson Boulevard is developed with a variety of mid-rise office and multi-

Table IV.A-2 (Continued)
Applicable Goals, Objectives, and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	family residential buildings that generally range in height from five- to seven-stories. West of the Project site, across Jandy Place, are two- to three-story studio/office uses and an associated surface parking area. The Project would employ siting, design, and landscaping elements that would respond to the scale and character of the surrounding uses. The new eight-story building would be located on the western portion of the Project site and would step down in size and scale, modulating in height from the proposed 135-foot structure to the existing 26-foot office building on the eastern portion of the Project site. In addition, the building scale would be defined by varying massing and height components that would break up the façade into distinct and offset planes. Additional design elements, including landscaped terraces, multiple wall planes, varying rooftop design, and the use of complementary surface materials, would further integrate the Project with the surrounding uses. Pedestrian-scaled Project frontages, ground level commercial uses, landscaping, open space, and streetscape improvements, including new street trees along Beatrice Street and Jandy Place as well as new seating along Jandy Place, would further improve the pedestrian experience and integrate the Project with the surrounding uses, and would enhance the character of the surrounding commercial area.
Policy 2-3.2: Establish commercial areas and street identity and character through appropriate sign control, landscaping and streetscape.	**No Conflict.** The Project would enhance the existing streetscape through building design and proposed landscaping and streetscape amenities. Ground level setbacks and street frontages that would include landscaping and pedestrian features such as public seating and gathering spaces would be provided along Beatrice Street and Jandy Place. These features would be available for use by employees of the building and surrounding community members. The proposed ground level commercial uses would also serve to create transparency along the street and enhance the pedestrian environment. Project signage would be appropriately scaled and aesthetically compatible with the architecture proposed for the Project site as well as the existing architecture in the surrounding area.
Industrial	
Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.	**No Conflict.** Design elements would serve to integrate the Project site with the surrounding area. The massing of the new building would be offset by the retention and integration of the existing two-story office building on the Project site as part of an integrated campus with varied heights. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would reduce the Project mass. Pedestrian-scaled Project frontages, ground level commercial uses, and landscaping, open space, and

Table IV.A-2 (Continued)
Applicable Goals, Objectives, and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	streetscape improvements would further integrate the Project site with the surrounding uses and improve the quality of the public realm by promoting pedestrian activity and further activating the streets in the vicinity of the Project site. In addition, proposed signage would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area. The Project's tallest elements would be located in the western portion of the Project site. The Project would step down in size and scale from west to east, modulating in height from the proposed 135-foot structure on the west side of the Project site to the existing 26-foot office building on the eastern portion of the Project site. As it relates to the multi-family residential uses to the south of the Project site, across Beatrice Street, the building design would include elements that would offset the massing along Beatrice Street, with landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials. In addition, the Project would incorporate ground level setbacks with landscaping and passive seating areas along Beatrice Street and Jandy Place, with an approximately 389-square-foot lot at the corner of Beatrice Street and Jandy Place for additional landscaping and open space. In addition, above grade parking would be visually integrated with the proposed building and would be screened by the ground floor commercial uses and architectural and landscaping elements. Thus, the Project would provide adequate buffering and landscaping and would be compatible with nearby residential developments.
Chapter V—Urban Design	
Design for Individual Projects	
Commercial	
<u>Height and Building Design for All Commercial Areas</u> Building materials shall be employed to provide relief to bland untreated portions of exterior buildings façades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character. Accordingly, the following policies are proposed. 1. Providing accenting, complementary building materials to building façades. 2. Designating architecturally untreated façades for signage.	**No Conflict.** The Project design would incorporate various elements that would provide architectural relief and add visual interest. The massing of the new building would be offset by the retention of the existing low scale building on the site as part of an integrated campus. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would vary the mass and scale of the Project. The Project would avoid long blank walls and would ensure that ground floor uses maintain a high degree of transparency and maximize a visual connection to the street. Landscaping would be provided throughout the interior and perimeter of the Project site, including on building terraces and the roof, adding to a stable and desirable character. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project site. In addition, mechanical and electrical equipment

Table IV.A-2 (Continued)
Applicable Goals, Objectives, and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
3. The use of articulations, recesses, surface perforations and other architectural features to break up long, flat building façades. 4. Screening of mechanical and electrical equipment from public view. 5. Requiring the enclosure of trash areas for all projects.	would be integrated into the Project's architectural design and screened from public view, and trash and recycling areas would be enclosed.
<u>Parking Structures</u> Parking structures shall be integrated with the design of the buildings they serve through: 1. Designing parking structure exteriors to match the style, materials and colors of the main building. 2. Maximizing commercial uses on the ground floor. 3. Landscaping to screen parking structures not architecturally integrated with the main building. 4. Utilizing decorative walls and landscaping to buffer residential uses from parking structures.	**No Conflict.** Parking for the Project would be located within two subterranean levels and three above grade levels within the proposed structure. The above grade parking would be visually integrated with the proposed building and would be screened by the ground floor commercial uses and architectural and landscaping elements, including the use of clinging vines to create a "green wall," as stated in Project Design Feature AES-PDF-8. Ground floor commercial uses are included along Beatrice Street and at the Beatrice-Jandy corner to activate the area. In addition, as shown in Figure II-4 in Section II, Project Description, of this Draft EIR, new trees would be planted to create a separation between the existing building and surface parking lot within the eastern portion of the Project site.
<u>Surface Parking Landscaping</u> 1. Devoting at least 4% of total surface area of surface parking lots to landscaping. 2. Landscaping should consist of appropriate plant materials including shrubbery, flowering plants, trees, berm, hedges and ground cover. 3. Providing trees at a ratio of at least one per 4 parking spaces. 4. Providing a landscaped buffer along public streets adjoining residential uses.	**No Conflict.** New parking for the Project would be provided in subterranean and above grade parking levels. The existing surface parking area located on the eastern portion of the Project site would remain. This area, which contains 20 parking spaces, would be improved with new plantings that exceed 4 percent of the total surface area of the parking lot, including a row of trees that at minimum will meet the one tree per four parking spaces ratio, as well as new hardscape and enhanced lighting in conformance with current Code standards, as shown in Figure II-4 in Section II, Project Description, of this Draft EIR.
<u>Light and Glare</u> 1. Installing on-site lighting along all pedestrian walkways and vehicular access ways. 2. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	**No Conflict.** The Project would include low-level exterior lights adjacent to the proposed building and along pedestrian walkways for security and wayfinding purposes. In addition, appropriate lighting would be provided at vehicular access points. Project lighting would be designed to minimize light trespass from the Project site and would comply with all LAMC requirements. 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. In addition, pursuant to Project Design Feature AES-PDF-5, all new outdoor lighting for

Table IV.A-2 (Continued)
Applicable Goals, Objectives, and Policies of the Palms–Mar Vista–Del Rey Community Plan

Goal/Objective/Policy	Analysis of Project Consistency
	the Project would be designed and installed with shielding and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or public rights-of-way.

Project consistency with additional Community Plan goals, objectives, and policies is analyzed in Section IV.H, Land Use and Planning, of this Draft EIR.

Source: Eyestone Environmental, 2023.

industrial, and residential uses. The Project would replace an existing one-story commercial building within the Project site with an eight-story mixed-use office building.

As described throughout Table IV.A-2 on page IV.A-32, the Project would employ siting, design, and landscaping elements that would respond to the scale and character of the surrounding uses. The Project would feature a contemporary architectural style and create a visually unified site that would complement the existing surrounding uses. By concentrating the Project's massing in a single building on the western portion of the Project site, the higher-scale uses would relate to the residential use across Beatrice street by locating similarly tall elements in proximity to each other. In addition, the Project would retain the existing low-scale office building and would employ varying massing and height components in the new structure that would break up the façade into distinct and offset planes and would include additional design elements, such as landscaped terraces, multiple wall planes, varying rooftop design, and the use of complementary surface materials, that would further integrate the Project with the surrounding uses. Pedestrian-scaled Project frontages with ground level commercial uses, landscaping, and pedestrian amenities would also contribute to the overall visual character of the site and its integration with the surrounding area.

Also, as discussed in Table IV.A-2, the Project would not conflict with the design guidelines for commercial projects set forth in the Urban Design Chapter of the Community Plan. In particular, the Project design would incorporate various elements that would provide architectural relief and add visual interest, including a "green wall" to screen above ground parking areas. The Project would avoid long blank walls and would ensure that ground floor uses maintain a high degree of transparency and maximize a visual connection to the street. Landscaping would be provided throughout the interior and perimeter of the Project site, including on building terraces and the roof. Project signage would be aesthetically compatible with the proposed architecture and mechanical and electrical equipment, as well as trash and recycling areas, would be integrated into the Project's architectural design and screened from public view. The above grade parking

would be visually integrated with the proposed building and would be screened by the ground floor commercial uses and architectural and landscaping elements. In addition, the existing surface parking area that would remain would be improved with new trees, hardscape, and lighting. Low-level lighting would be provided along pedestrian walkways and at vehicular access points, and all lighting would be directed on to the Project site and away from adjacent uses.

(c) Los Angeles Municipal Code

As discussed above, the Project site is zoned M2-1 (Light Industrial, Height District 1), which permits M1 or MR2 uses; airport or aircraft landing field; automobile dismantling yard; cemetery; circus quarters; morgue; riding academy or stable; rifle range; curing, composting, and mulching facilities; and cargo container storage yard. Height District 1 within the M2 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5 to 1.

As previously described, the Project would develop 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The height of the proposed building would be approximately 135 feet to the top of the roof or parapet. Per the LAMC Section 12.21.1.B.3, a mechanical penthouse component could extend approximately 20 feet above the building height.

As part of the Project, the existing structures at 12575 Beatrice Street within the western portion of the Project site would be removed and replaced with a new 199,500-square-foot office and retail building, while the existing 87,881-square-foot office building at 12541 Beatrice Street within the eastern portion of the site would be retained. As discussed in Section II, Project Description, of this Draft EIR, pursuant to LAMC Section 17.50-B,3(c), the Project Applicant would request a Parcel Map Exemption—Lot Line Adjustment to adjust the existing Project site lot lines to accommodate a corner landscaped parcel, and a building site for the construction of the proposed new building (at 12575 Beatrice Street). When approved and the lot line adjustment is complete, the lot at 12575 Beatrice Street would contain approximately 103,281 square feet (2.37 acres), and the lot at 12541 Beatrice Street would contain approximately 93,182 square feet (2.14 acres). As such, the Project's overall FAR would be 1.46:1.[14] This is within the allowable FAR of 1.5:1 pursuant to the M2-1 zone.

[14] *The Project site is 196,463 square feet in lot area and the Project will result in 287,381 square feet in new and retained floor area (287,381 / 196,463 = 1.46).*

The M2-1 zone does not require the provision of any setbacks for commercial or industrial uses. Nevertheless, the Project would provide setbacks along Beatrice Street and Jandy Place ranging from 0 to 20 feet that would include landscaping and seating.

The Project would also be consistent with LAMC requirements related to lighting and signage. As previously discussed, the Project would feature pedestrian-scale exterior lighting fixtures, which would be provided along the public areas of the Project site. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project site. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project site and with the requirements of the LAMC.

(d) California Code of Regulations, Title 24

Title 24 of the California Code of Regulations includes mandatory standards related to lighting that would be applied to the Project, including use of lighting controls such as occupant sensing controls and use of lighting products such as fluorescent lamp ballasts, lamps, power supplies, and emergency lighting that complies with Title 24. The Project would adhere to minimum light intensities along pedestrian pathways, circulation ways, and paths of egress. In addition, the Project would comply with lighting control and cutoff requirements, power density allowances, and sign lighting controls. The Project would also adhere to the lighting standards regarding maximum allowable light levels, efficiency requirements, control requirements, and light trespass requirements. In addition, the Project would adhere to all applicable LAMC lighting standards. In general, Project lighting would be designed to provide efficient and effective lighting while minimizing light trespass from the Project site, reducing sky-glow, and improving nighttime visibility through glare reduction. Thus, the Project would comply with all of the applicable aesthetic-related provisions including in Title 24 of the California Code of Regulations, including the California Building Code (Title 24, Part 1), California Electrical Code (Title 24, Part 3), the California Energy Code (Title 24, Part 6), and the California Green Building Standards Code (Title 24, Part 11).

(e) Conclusion

Based on the discussion above, the Project would not conflict with the zoning and other regulations governing scenic quality. Thus, impacts with respect to Threshold (c) as it relates to regulations governing scenic quality would be less than significant.

(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. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

Prior Threshold (c): Would the project substantially degrade the existing visual character or quality of the site and its surroundings?[15]

(1) Impact Analysis

(a) Construction

As part of the Project, the existing structures at 12575 Beatrice Street, including one office building and two accessory structures, would be removed and a new 199,500 square foot office/commercial building would be constructed. The existing office building at 12541 Beatrice Street would be retained. During the Project's construction phase, the visual character of the Project site would be altered due to demolition, site preparation, grading and excavation for the subterranean parking, building construction, and the installation of paving/concrete and landscaping. The staging of construction equipment and materials, which is anticipated to occur primarily on-site, also would temporarily alter the visual appearance of the Project site.

Overall, while affecting the visual character of the Project area on a temporary, short-term basis, Project construction would not substantially degrade or alter the long-term visual character or quality of the Project site or its surroundings. The appearance of the

---

[15] *As part of the 2018 State CEQA Guidelines update, the prior Aesthetics Threshold (c) regarding a project's effects on visual character and quality, which was evaluated in the MND for the Project, was modified to instead consider whether a project would conflict with zoning and other regulations governing scenic quality. However, the judgment in Karney Management v. City of Los Angeles et al. ordered an EIR to be prepared to analyze potential impacts related to visual character and quality. Therefore, the analysis included in this Draft EIR addresses both whether the Project would conflict with applicable zoning and other regulations governing scenic quality (new Threshold (c)) and whether the Project would substantially degrade the existing visual character or quality of the Project site and its surroundings (prior Threshold (c)).*

Project site during construction would be typical of construction sites in urban areas. Implementation of project design features requiring construction fencing to be placed along the periphery of the Project site to screen construction activity from view at street level (Project Design Feature AES-PDF-1); ensuring that no unauthorized materials are posted on any temporary construction barriers or pedestrian walkways that are accessible/visible to the public, and that such barriers and walkways are maintained in a visually attractive manner (Project Design Feature AES-PDF-2); and requiring outdoor construction lighting to be shielded and/or aimed such that the light source cannot be seen from nearby residential properties, the public right-of-way, or from above (Project Design Feature AES-PDF-3) would further ensure that the visual character would not be substantively degraded during construction of the Project. Furthermore, construction activities would be temporary in nature, and the temporary change in the visual character and quality of the Project site and surrounding area associated with construction activities at the Project site would cease upon completion of the Project.

(b) Operation

The Project site is located in an area that is currently developed with a mix of office, light industrial, and manufacturing uses with one multi-family residential structure located south of the Project site across Beatrice Street (west of Westlawn Avenue). The Project would involve the removal of an existing one-story office building and two accessory structures located at 12575 Beatrice Street and the construction of a new eight-story office building with ground floor commercial uses. The existing two-story office building located on the Project site at 12541 Beatrice Street and the adjacent surface parking area would be retained.

The Project would unify and enhance the overall appearance of the Project site by removing an older commercial building and accessory structures and developing a new commercial office building that would be designed in an updated, contemporary architectural style that would complement the existing modern two-story office building on the Project site to be retained, thereby creating an integrated creative office campus. The Project would be physically and visually integrated with the surrounding area by applying a variety of siting, design, and landscaping elements. Specifically, while the height, density, and mass of the proposed structure would increase as compared to existing conditions, the Project would be sited and designed to respond to the neighborhood context. To ensure that the Project is compatible with the surrounding neighborhood, the Project has been designed with ground level setbacks along the Beatrice Street and Jandy Place street frontages and within the development. These areas would be landscaped, pedestrian oriented, and provide passive seating areas for the public.

The Project concentrates its floor area to a single multi-story building, rather than distributing allowable floor area over the entire development site. In doing so, the Project

reduces its massing and allows for increased open space and landscaping. Additionally, the new eight-story building would be located on the western portion of the Project site and would step down in size and scale, modulating in height from the proposed 135-foot structure to the existing 26-foot office building on the eastern portion of the Project site.

Design elements would be incorporated into the Project that would further serve to break up the building massing and visually integrate the site with the surrounding area. As illustrated in the conceptual elevations included as Figure II-5 in Section II, Project Description, of this Draft EIR, the massing of the new building would be offset by the retention of the existing two-story office building on the Project site as part of an integrated campus. Further, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would vary the mass and scale of the Project. In addition, the Project would provide pedestrian-scaled Project frontages along Beatrice Street and Jandy Place that would incorporate ground level setbacks with landscaping and passive seating areas. Ground level commercial uses would further create transparency along the street and maintain the human scale at the ground floor. The above grade parking levels would be visually integrated with the proposed building and would be screened by the ground floor commercial uses and architectural and landscaping elements, including the use of clinging vines to create a "green wall," as stated in Project Design Feature AES-PDF-8. Mechanical, electrical, and rooftop equipment would also be integrated into the Project's architectural design and, as with trash collection and storage areas, would be screened from view from public rights-of-way. Project signage would be appropriately scaled and aesthetically compatible with the architecture proposed for the Project site as well as the existing architecture in the surrounding area. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. These design elements would maximize visual connections between the Project site and the street and surrounding uses.

Landscaping, open space, and streetscape improvements would further add to the visual quality of the Project site while enhancing the pedestrian experience and visually integrating the Project site with the surrounding uses. The Project would provide approximately 38,033 square feet of landscaped area, including trees and green space, and approximately 54,583 square feet of hardscape area, including courtyards and pathways throughout the Project site and on the building terraces on the upper levels of the proposed building. A pedestrian paseo varying between 32 feet to 48 feet wide lined with seating areas and landscaping would extend between the proposed building and the existing building on the site that will be retained. Trees would also be planted along Jandy Place, a portion of Beatrice Street, and adjacent to an existing surface parking area on the eastern portion of the site. In addition, a new landscaped seating area would be provided along Jandy Place, providing a gathering area for users of the site. Landscaping would also be incorporated in the terrace levels and the roof, thereby adding an extensive amount of greenery to the building's façade. To accommodate the proposed development, the

existing perimeter landscaping and fencing along portions of Beatrice Street and Jandy Place, which acts as a visual and physical barrier between portions of the Project site and the surrounding area, would be removed and replaced with a unified creative office campus with elements that engage and unify the neighborhood. For example, landscaped terraces, multiple wall planes, varying rooftop design, and complementary surface materials would reduce the Project mass. Pedestrian-scaled Project frontages, ground level commercial uses, and landscaping, open space, and streetscape improvements would further integrate the Project site with the surrounding uses and improve the quality of the public realm by promoting pedestrian activity and further activating the streets in the vicinity of the Project site. Proposed signage would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area. Additionally, the Project would replace the 59 non-protected trees to be removed throughout the Project site at a rate of at least 1:1 and would incorporate the two existing protected California Sycamore trees into the overall Project landscaping.

Overall, the Project's siting, design, massing, setbacks, and landscape elements outlined above would ensure compatibility of the Project with its site and surroundings.

In conclusion, construction and operation of the Project would not degrade the existing visual character or quality of the site or its surroundings, and impacts would be less than significant.

(2) Mitigation Measures

Project-level impacts related to a substantial degradation of the existing visual character or quality of the site and its surroundings would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to a substantial degradation of the existing visual character or quality of the site and its surroundings were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain 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?

(1) Impact Analysis

(a) Construction

Lighting needed during construction of the Project has the potential to generate light spillover to off-site sensitive land uses in the vicinity of the Project site, including the multi-family Avalon Playa Vista multi-family residential building to the south of the Project site across Beatrice Street (west of Westlawn Avenue). While the majority of Project construction would occur during daylight hours, construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when the sun sets earlier and there is less daylight during typical working hours. Outdoor lighting sources during nighttime construction activities typically include floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as identified above in Project Design Feature AES-PDF-3, construction lighting would be shielded and/or aimed so that the light source cannot be seen from adjacent properties, the public right-of-way, or from the above. Thus, construction lighting, while potentially bright, would be focused on the particular area that is undergoing work. Accordingly, uses that are not directly adjacent to the construction site, including nearby residential uses, would not be anticipated to be substantially affected by construction lighting. Therefore, with adherence to existing LAMC regulations and Project Design Feature AES-PDF-3, light resulting from construction activities would not significantly impact off-site sensitive uses, 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 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. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, the glare from vehicles that currently park on the Project site would be similar or cause greater visual impacts than any temporary construction glare that may be generated during construction activities. Additionally, as set forth in Project Design Feature AES-PDF-1, temporary construction fencing would be placed along the periphery

of the Project site to screen construction activity from view at the street level at off-site locations, which could help to reduce glare. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

(b) Operation

New sources of artificial lighting that would be introduced by the Project would include: low-level interior lighting visible through the windows of the buildings; signage lighting; architectural lighting on the buildings, including lighting associated with podium uses and activities; low-level security and wayfinding lighting; and landscape lighting. New sources of glare would include building surfaces and Project-related vehicles. However, the Project would eliminate sources of glare from vehicles that currently park on the surface parking area located between the on-site structures, which will be removed as part of the Project.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed towards the interior of the Project site to avoid light spillover onto nearby sensitive uses. Project lighting would meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

As described in Section II, Project Description, of this Draft EIR, Project signage would include building identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage. No off-site signage or billboard advertising is proposed as part of the Project. The Project would also not include signage with flashing, mechanical, or strobe lights. In general, new signage would be architecturally integrated into the design of the proposed buildings and would establish appropriate identification for the on-site commercial uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials, which would include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass

railings. As provided above in Project Design Feature AES-PDF-7, the Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the Project would remove some of the existing surface parking areas on the site, including within the center of the Project site and along the northern site boundary, thereby eliminating some existing sources of glare. Proposed parking would be located in two subterranean levels and three above grade levels that would be screened and integrated into the new building's architecture, thereby eliminating the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions. While headlights from vehicles entering and exiting the Project's driveways would be visible from the surrounding uses during the evening hours, proposed perimeter landscaping would serve to partially screen it and such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Overall, based on the above, construction and operation of the Project 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.

(2) Mitigation Measures

Project-level impacts related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

e. Cumulative Impacts

As indicated in Section III, Environmental Setting, of this Draft EIR, there is one related project in the vicinity of the Project site. This related project, known as Del Rey Pointe, is located at 5000 S. Beethoven Street and includes the development of 236 multi-family residential apartment units in a six story building. In terms of the cumulative analysis included herein, only those projects that would be sufficiently close to

influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses could pose cumulative effects in conjunction with the Project, are discussed further below.

(1) Impact Analysis

(a) Scenic Vistas

As previously discussed, due to the highly urbanized and built out surroundings, publicly available scenic vistas of visual resources are not available in the vicinity of the Project site. In addition, as illustrated in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, given its distance to the Project site and intervening development, including the Marina Freeway, the Del Rey Point related project is not located within the same field of view as the Project. As with the Project, the related project would likely become part of the overall urban fabric of the area and would also not block or obstruct views of visual resources. **As such, given the location of related project in relation to the Project site and the unavailability of scenic vistas in the Project vicinity, the Project's contribution to cumulative impacts to scenic vistas would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Regulations Governing Scenic Quality

As with the Project, future developments, including the related project, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics. Related projects would also 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. **Therefore, the Project's contribution to cumulative impacts related to consistency with regulations governing scenic quality would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(c) Visual Character

Cumulative impacts regarding visual character and quality may occur if any related development is located in close enough proximity to the Project site to combine with the Project and result in significant adverse changes in the visual quality and character of the surrounding area. With respect to visual character and quality, the related project is located northwest of the Project site, across the Ballona Creek and the Marina Freeway, and that related project site is currently obstructed by existing intervening development. As such, the related project would not be anticipated to combine with the Project to adversely affect the visual quality and character of the area. Additionally, the related project represents infill development, and, in general, would reinforce existing and emerging land

use patterns (e.g., mid- and high-rise development) in the area rather than introduce new development characteristics to the Project area. Furthermore, as with the Project, the related project, at six stories, would be consistent with the general urban character of the Playa Vista community in compliance with the regulations discussed above. In addition, similar to the Project, future developments, including the related project, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics (e.g., LAMC height limits, density, setback requirements, and specific Community Plan Design Guidelines, etc.). As with the Project, the related project would also be required to comply with the signage provisions of the LAMC, as applicable, including the location of signs, size of signs, sign illumination, and types of signage. **As such, the Project's contribution to cumulative impacts to visual character would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(d) Light and Glare

Development of the Project, as well as the related project in the area, would introduce new or expanded sources of artificial light. Consequently, ambient light levels are likely to increase in the overall Project area.

The Project and related project would include typical land uses for the Project area, which would not significantly alter the existing lighting environment currently experienced in the area. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the moderate ambient nighttime artificial light levels already present. Furthermore, the Project's and related project's adherence to applicable City requirements regarding lighting would control the Project's potential artificial light sources to a sufficient degree so as not to be considered cumulatively considerable. As with the Project, related projects would also be required to comply with the signage requirements of the LAMC, as applicable, including the requirements for sign illumination. Similarly with regard to glare, the Project's and related project's proposed uses would be compatible with other mixed-use commercial and residential development in the vicinity of the Project site. In addition, it is anticipated that the Project and other future development projects would be subject to discretionary review to ensure that significant sources of glare are not introduced. **Therefore, the Project's contribution to cumulative light and glare impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to aesthetics, including impacts to scenic vistas, regulations regarding scenic quality, visual character, and light and glare, would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to aesthetics, including impacts to scenic vistas, regulations regarding scenic quality, visual character, and light and glare, 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.