

IV. Environmental Impact Analysis

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A. Aesthetics

1. Introduction

As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, Senate Bill 743 (Public Resources Code Section 21099(d)), which was adopted in 2013, established new rules for evaluating aesthetic and parking impacts under the California Environmental Quality Act (CEQA) for certain types of projects. Public Resources Code Section 21099(d) states: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” Public Resources Code Section 21099(a) defines a “transit priority area” as “an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21099(a) defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.” Public Resources Code Section 21099(a) defines an “infill site” as “a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.” Public Resources Code Section 21099 also provides that aesthetic impacts do not include impacts on historical or cultural resources.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [*L.A. CEQA Thresholds Guide*] shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”

The Project is an employment center project, as it is located on property that is zoned to permit commercial uses with a maximum floor area ratio (FAR) of 1.5:1, which is

greater than the 0.75 FAR required by Public Resources Code Section 21099(a) to be considered an employment center. In addition, as shown in Figure II-3 in Section II, Project Description, of this Draft EIR, the Project Site is located on an infill site within 0.5 mile from a major transit stops. The Project Site is served by numerous Los Angeles County Metropolitan Transportation Authority (Metro) bus lines and Los Angeles Department of Transportation (LADOT) transit service, the majority of which provide a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Specifically, several bus stops are located along Sunset Boulevard and Gower Street, including Metro bus line 2, DASH Hollywood, and DASH Hollywood/Wilshire. In addition, the Metro Hollywood/Vine Station is located approximately 0.5 mile northwest of the Project Site. Thus, as shown in Figure II-3 in Section II, Project Description, of this Draft EIR, the Project is located in a transit priority area as defined in Public Resources Code Section 21099(a). The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in ZI No. 2452. Accordingly, the Project qualifies as an employment center project on an infill site within a transit priority area. Therefore, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project's potential impacts to views of scenic vistas, the Project's potential to damage scenic resources within a scenic highway, and the Project's potential to create a new source of substantial light and glare were determined to be less than significant. While the Project's aesthetic impacts shall not be considered a significant impact on the environment pursuant to Senate Bill 743, the Initial Study provided that, for informational purposes, the EIR will discuss the Project's effects on visual character and visual quality of the site and its surroundings, including from shading and shadows. Subsequent to release of the Initial Study, the State CEQA Guidelines Appendix G threshold questions have been updated, including a modification to the question regarding a project's effects on visual character and quality. For informational purposes, and not for determining whether the Project would result in significant impacts to the environment, this section of this Draft EIR addresses the Project's potential effects relative to both the previous Appendix G threshold question regarding the Project's effects on visual character and quality as well as the updated Appendix G threshold question.

a. Regulations Governing Scenic Quality

This analysis considers whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Local plans, policies, and regulations governing scenic quality that are applicable to the Project Site, including the City of Los Angeles General Plan Framework Element and Conservation Element, the Hollywood Community Plan (Community Plan), the Hollywood Redevelopment Plan (Redevelopment

Plan), the Citywide Urban Design Guidelines, the City of Los Angeles Walkability Checklist, and the Los Angeles Municipal Code (LAMC).

b. Visual Character

As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions have been updated. The prior Appendix G threshold question related to the substantial degradation of the existing visual character or quality of a site and its surrounding has been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality, as discussed above. However, as the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included here for information purposes only.

The analysis of visual character focuses on the Project's visual relationship with existing and planned land uses in the vicinity of the Project Site. The analysis considers qualities related to visual character, such as density, massing, setbacks, materials, and the general composition of aesthetic features, as well as the relationships between these elements. The analysis also considers both natural and man-made features with aesthetic value. Generally, urban features that may contribute to a valued aesthetic character or image include structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; landscaped park areas; etc. Also considered in the discussion of visual character are the loss of existing features of aesthetic value and the introduction of contrasting features that contribute to a decline in overall visual character (e.g., the introduction of contrasting features that overpower familiar features, eliminate context or associations with history, or create visual incompatibility where there may have been apparent efforts to maintain or promote a thematic or consistent character).

2. Environmental Setting

a. Regulatory Framework

(1) Senate Bill 743

Senate Bill 743 became effective on January 1, 2014. Among other provisions, Senate Bill 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on

the environment.”^{1,2,3} Consistent with Senate Bill 743, the City issued ZI No. 2452 regarding aesthetic and parking impacts for specified projects located in a transit priority area. ZI No. 2452 summarizes the provisions of Senate Bill 743 and specifies that aesthetic character, visual resources, scenic vistas, light and glare, and shade and shadow shall not be considered an impact for infill projects within transit priority areas.

(2) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) provides direction regarding the City’s vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. Although the General Plan Framework does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts.

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods. “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. With respect to neighborhood design, the Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

¹ *Public Resources Code Section 21099 defines an employment center project as a project that is located on a property that is zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.*

² *Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.*

³ *Public Resources Code Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”*

The Open Space and Conservation Chapter of the Framework Element calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreational resources are currently in short supply and therefore suggests that pedestrian-oriented streets might serve as important resources for serving the open space and recreational needs of residents.

An analysis of whether the Project would conflict with applicable goals, objectives, and policies governing scenic quality included in the General Plan Framework Element is provided below. The Project's consistency with other applicable goals, objectives, and policies of the General Plan Framework is included in Section IV.G, Land Use and Planning, of this Draft EIR.

(3) Conservation Element of the City of Los Angeles General Plan

Section 5 of the City's General Plan Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.⁴ In addition, Section 15, Land Form and Scenic Vistas, of the General Plan's Conservation Element, adopted in September 2001, establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant land forms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources. The Project's consistency with applicable policies in the Conservation Element is analyzed in the impact analysis below. Further discussion of the Project's consistency with the Conservation Element is also provided in Section IV.G, Land Use and Planning, of this Draft EIR.

(4) Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, which was adopted on December 13, 1988 and is currently being updated, is one of 35 community plans established for different areas of the City to

⁴ *City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.*

implement the policies of the General Plan Framework.⁵ The specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Hollywood Community within the larger framework of the City. The Community Plan also 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.⁶

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 also relate to aesthetic issues. For example, the Community Plan calls for the coordinated development of Hollywood with other parts of the City and the perpetuation of Hollywood's image as the international center of the motion picture industry. The Community Plan also encourages the conservation of open space within the Community Plan area. The Project's consistency with applicable objectives from the Community Plan that relate to aesthetics is discussed below. Additional discussion related to the Project's consistency with the Community Plan is provided in Section IV.G, Land Use and Planning, of this Draft EIR.

(5) Hollywood Redevelopment Plan

The Community Redevelopment Agency's Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986, and amended on October 31, 2003.⁷ The Hollywood Redevelopment Project Area encompasses approximately 1,107 acres bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Redevelopment Plan was designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare. More specifically, as it relates to this analysis, the goals established in the Redevelopment Plan

⁵ The City of Los Angeles Department of City Planning is currently updating the Hollywood Community Plan (referred to as HCPU2). Until the updated Community Plan is adopted, the currently adopted plan remains in effect. See Section IV.G, Land Use and Planning, of this Draft EIR for further discussion.

⁶ In general, the updated Community Plan aims to direct anticipated development to already urbanized areas of the Community Plan Area, identifying suitable areas for new development while preserving existing low-scale neighborhoods.

⁷ Community Redevelopment Agencies throughout the State were dissolved in 2012 pursuant to State law (ABX1 26). However, ABX1 26 did not dissolve existing redevelopment plans. Thus, administration of the Hollywood Redevelopment Plan was transferred to the CRA/LA, the successor for the former Community Redevelopment Agency of the City of Los Angeles, and the requirements for development included therein are still in effect.

include reviving the historic core of the area, preserving historically significant structures, and recommending urban design guidelines. The Project's consistency with the applicable goals and requirements included in the Redevelopment Plan related to scenic quality is discussed below. Further discussion of the Project's consistency with the Redevelopment Plan is also included in Section IV.G, Land Use and Planning, of this Draft EIR.

(6) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework's urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the General Plan Framework and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC.

The Citywide Design Guidelines are divided into three sections: residential, commercial, and industrial. Within each section are a number of design principles and measures that address the different elements of site and building design and environmental sensitivity based on land use. Each section of the Citywide Design Guidelines is organized by overarching objectives, followed by a list of specific implementation strategies. The Project's consistency with the objectives of the Citywide Design Guidelines for commercial uses is discussed in the impact analysis below.

(7) City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the General Plan Framework. City Planning Department staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The Walkability Checklist is also intended to be used by architects, engineers, and all community members to create enhanced pedestrian movement, and access, comfort, and safety. The City Planning Commission adopted the Walkability Checklist in 2007 and

directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.⁸

In the field of urban design, walkability is the measure of the overall walking conditions in an area. Different factors have been identified with regard to enhancing walkability in the private versus public realms. Specific factors influencing walkability within the private realm (project elements that are not in the public right-of-way/realm) include building orientation, building frontages, signage and lighting, on-site landscaping, and off-street parking and driveways. Contributors influencing walkability within the public realm include sidewalks, crosswalks/street crossings, on-street parking, and utilities. Street connectivity, access to transit, aesthetics, landscaping, and street furniture are additional components that are discussed in the Walkability Checklist as they also influence the pedestrian experience. Not every Walkability Checklist guideline is appropriate for every project. The primary goal is to consider the applicable guidelines in the design of a project, thereby improving pedestrian access, comfort, and safety in the public realm.

The Project's consistency with applicable design guidelines in the Walkability Checklist is discussed in the impact analysis below.

(8) Los Angeles Municipal Code

Chapter 1 of the LAMC, referred to as the City of Los Angeles Planning and Zoning Code, sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. The LAMC also sets forth specific regulations regarding lighting. Relevant LAMC provisions include the following:

- Chapter 1, Article 2, Sec. 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 1, Article 4.4, Sec. 14.4.4 E. No sign shall be arranged and illuminated in such a manner as to produce a light intensity greater than 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially-zoned property.
- Chapter 9, Article 3, Div. 1, Sec. 93.0117(b). No exterior light may 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; elevated habitable porch, deck, or balcony on any property containing residential

⁸ City of Los Angeles Department of City Planning, *Walkability Checklist Guidance for Entitlement Review*, November 2008.

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.

- Chapter 9, Article 9, Division 5, Sec 99.05.106.8. Comply with lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6. Meet or exceed exterior light levels and uniformity ratios for lighting zone 3 as defined in Chapter 10 of the California Administrative Code, Title 24, Part 1.

b. Existing Conditions

(1) Scenic Vistas

A visual resource is a natural or urban aesthetic feature that contributes to the visual character of a site or surroundings. Natural features may include, but are not limited to, open space, native or ornamental vegetation/landscaping, topographic or geologic features, and natural water sources. Urban features that may contribute to a valued aesthetic character or image include structures of architectural or visual prominence; public plazas, art, or gardens; heritage oaks or other trees or plants protected by the City; pedestrian amenities; landscaped medians or park areas, etc.

There are no protected trees or unique geologic or topographic features on the Project Site that would be considered visual resources located on-site. The Project Site includes several structures that are considered to be potential historical resources and a potential historic district. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, however, the buildings are considered historical resources not for their architecture or because of their aesthetic value, but because of their association with the motion picture industry. Visual resources also include off-site resources that may be viewed within the same viewshed as the Project Site from nearby or distant vantage points. Visual resources in the vicinity of the Project Site include the Hollywood Hills, located approximately 2.3 miles to the north; the Hollywood Sign, a City-designated historic monument located approximately 2.5 miles to the north within the Hollywood Hills; and a number of historic buildings.

(2) Scenic Resources with a State Scenic Highway

As discussed 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. The nearest officially eligible State scenic highway is along the Foothill Freeway (I-210), located approximately 15 miles northeast of the Project Site. The nearest City-designated scenic highway is along a portion of Sunset Boulevard, approximately 7 miles west of the Project Site.

(3) Visual Character

(a) Project Site

The Project Site comprises an approximately 16.5-acre lot containing the existing Sunset Gower Studios, located at 1438 North Gower Street.⁹ The Project Site is currently occupied by creative office space, production support, and sound stages. The Project Site also includes service areas and three parking structures. As depicted in the site plan of existing uses included as Figure II-4 in Section II, Project Description, of this Draft EIR, most of the sound stages are located along Gower Street, and the parking structures are located along Gordon Street, with the creative office and production support uses dispersed in buildings that are mostly centrally located on the Project Site. There are a total of 48 existing structures on the Project Site, which range in height from one to five stories. Landscaping within the Project Site includes a variety of ornamental landscaping and hardscape features, including trees, hedges, and shrubs. Trees internal to the Project Site consist of various non-native species including palm, cherry, pine, and myrtle. None of the trees within the Project Site are subject to the City's Protected Tree Regulations, including the City's Tree Preservation Ordinance (No. 177.044). Street trees are located along the perimeter of the Project Site on all sides, including a variety of trees along Gower Street, Fountain Avenue, and Gordon Street, and elevated Mexican palm trees along Sunset Boulevard. Additional ornamental landscaping is located along the perimeter of some of the buildings that front Sunset Boulevard and Gower Street. The entrance to the Project Site from Sunset Boulevard via Beachwood Drive is planted with shrubs and trees. The southeast portion of the Project Site is surrounded by a chain link fence mounted on a white masonry wall. An ornamental identification sign spans the vehicular access point at Sunset Boulevard and Beachwood Drive.

Due to the interior focus of the Project Site, the visual character of the Project Site as viewed from off-site areas is dominated by the buildings that front the surrounding roadways along the periphery of the Project Site, as shown in the photographs of the Project Site provided in Figure IV.A-1 on page IV.A-11. Specifically, as illustrated in Figure IV.A-1, Photo 1 through Photo 4, the visual character of the Project Site as seen from Sunset Boulevard and the northern portion of Gower Street is consistent with the urban environment in this area, and is characterized by low- and mid-rise buildings with direct street frontage. The visual character of the Project Site along Fountain Avenue and the southern portion of Gower Street is dominated by the windowless, white façades of the

⁹ *The northwest corner of Sunset Gower Studios (1448 N. Gower Street) is under separate ownership, no development is proposed for the property, and no entitlements are sought for the property. However, because it is integrated into and a part of the Sunset Gower Studios it is included as part of the 16.5-acre Project Site for purposes of environmental review. Entitlements are only sought for development that would occur on 15.9 acres of the Project Site which does not include the northwest corner.*

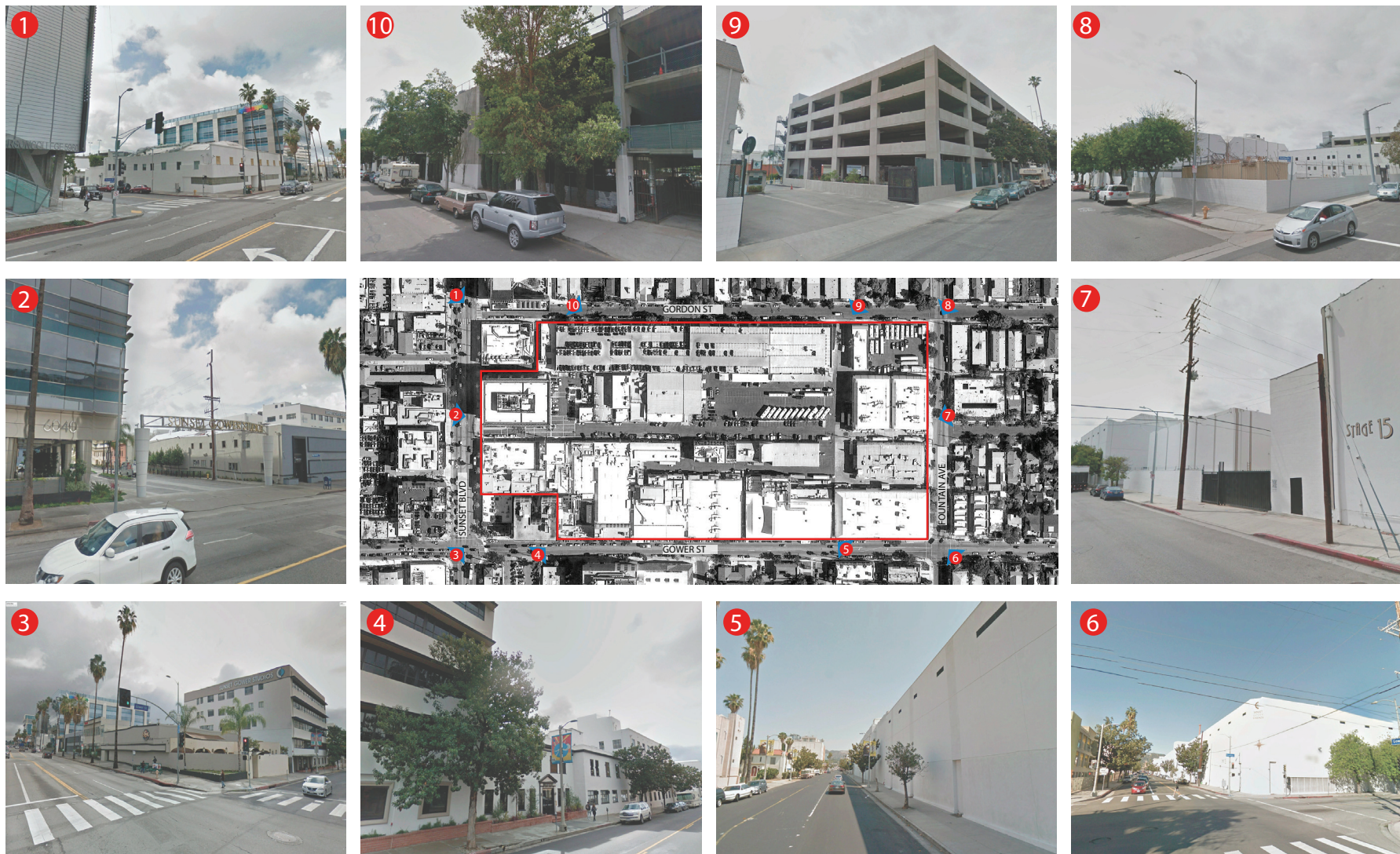


Figure IV.A-1
Existing Project Site Photographs

soundstages that border these streets, as depicted in Figure IV.A-1 on page IV.A-11, Photo 5 through Photo 7. The corner of Fountain Avenue and Gordon Street is characterized by the staging area bordered by a wall-mounted chain-link fence, as depicted Figure IV.A-1, Photo 8. Figure IV.A-1, Photo 9 and Photo 10 show the northern portion of Gordon Street, which is largely dominated by the three parking structures.

(b) Surrounding Area

The area surrounding the Project Site is characterized by a mix of uses within a range of building types. Uses include retail/commercial, offices, hotels, educational institutions, single-family and multi-family residences, and surface parking areas. The buildings vary in age, architecture, heights, massing, and materials. In general, as depicted in Figure IV.A-2 on page IV.A-13, the area contains a mix of low-, mid-, and high-rise buildings, both historic and modern, with varied architectural styles. Specifically, the area to the north of the Project Site along Sunset Boulevard is characterized by low-, mid-, and high-rise commercial and office uses, including retail and restaurant uses within the Sunset Gower Plaza, Siren Studios, a motel, and other commercial/retail uses. High-rise buildings are located further to the west and east along Sunset Boulevard. The area to the east of the Project Site, along Gordon Street, contains one to three story single- and multi-family residential buildings and a mid- to high-rise building containing Emerson College. The area to the south of the Project Site, along Fountain Avenue, is predominantly characterized by single- and multi-family residential uses, with a low-rise commercial building located at the corner of Fountain Avenue and Gordon Street, adjacent to the Project Site. The area to the west of the Project Site, along Gower Street, contains low- to mid-rise retail, restaurant, and multi-family residential uses.

(4) Light and Glare

The Project Site is located within the highly urbanized Hollywood community. Given the types of land uses in the vicinity of the Project Site, existing ambient nighttime light levels are characterized as high, particularly along Sunset Boulevard, which is a well-developed commercial boulevard, and areas to the north. Ambient light levels in the residential areas to the east, south, and west are more moderate. Exterior light sources in the area include lighting for signage, architectural building highlighting, landscaping, parking lot visibility, and security purposes. Other exterior lighting sources include pole-mounted street lights along adjacent streets and vehicle headlights, particularly along Sunset Boulevard. Interior lighting from windows of nearby commercial and residential uses also contributes to the ambient nighttime levels.

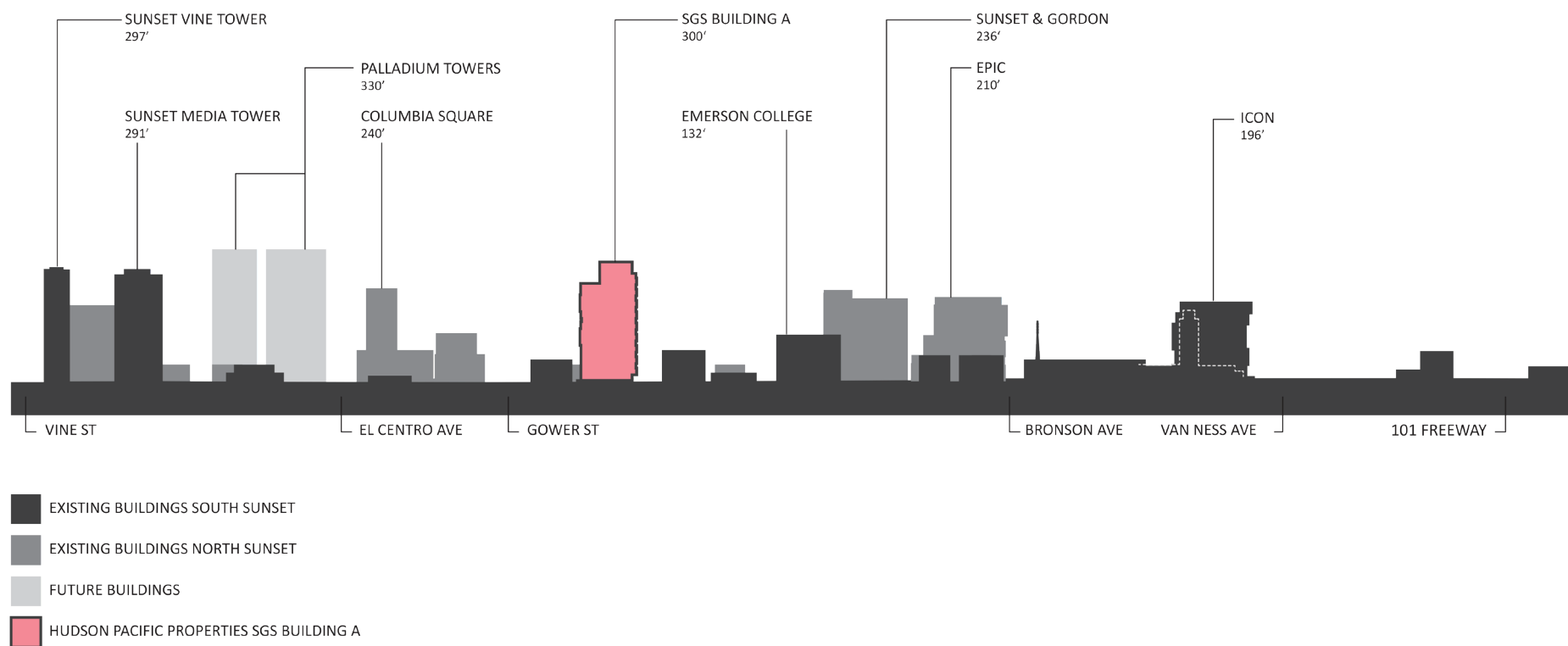


Figure IV.A-2
Cross Section View of Buildings Surrounding the Project Site

Existing light sources on the Project Site include limited pole-mounted lights in the surface parking areas and along interior roadways, exterior building lighting, some architectural and landscape lighting, and security lighting. Light levels generated within the Project Site are moderate.

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 either no windows or low reflectivity windows. The building located at 6040 Sunset Boulevard does generate some glare, as it is constructed of glass. However, the glass is mirrored and is not highly reflective. The Project Site also generates a minimal amount of glare that emanates from sunlight reflecting off parked vehicles within the Project Site. However, these glare sources are not considerable in the context of the urban environment.

The nearest off-site receptors to the Project Site that are considered sensitive relative to light and glare are the residential uses along Gordon Street, Fountain Avenue, and Gower Street, adjacent to the Project Site on the east, south, and west, respectively, and the motel on Sunset Boulevard, adjacent to the Project Site on the north. Additionally, 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;

Threshold (b): Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

Threshold (c): In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible

vantage point.) If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality;¹⁰

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

For this analysis, the Appendix G Thresholds provided above are relied upon. In assessing impacts related to aesthetics, the City will use Appendix G of the CEQA Guidelines as the thresholds of significance. The aesthetics analysis included herein utilizes the relevant factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide provided below, as appropriate, to assist in answering the above Appendix G threshold questions.

As previously discussed, the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, evaluated the Project's potential to have a substantial adverse effect on a scenic vista, the Project's potential to damage scenic resources within a scenic highway, and the Project's potential to create a new source of substantial light and glare. The Initial Study determined that the Project would result in no impact related to the Project's potential to damage scenic resources within a scenic highway. In addition, the Initial Study concluded that the Project would have a less-than-significant impact related to the Project's potential to have a substantial adverse effect on a scenic vista and the creation of a new source of substantial light and glare. Therefore, these topics and associated criteria from the L.A. CEQA Thresholds Guide are not further evaluated herein.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts associated with 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.;

¹⁰ *The Project Site is in an urbanized area. As such, the analysis would address whether the Project would conflict with applicable zoning and other regulations governing scenic quality. In addition, as previously discussed, the analysis would consider the prior Appendix G threshold question of whether the Project would substantially degrade the existing visual character or quality of the site and its surrounding.*

- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- 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;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

b. Methodology

(1) Conflict with Regulations Governing Scenic Quality

The Project Site is located in an urbanized area. As such, in accordance with the threshold set forth in Appendix G of CEQA Guidelines, the analysis discusses whether the Project would conflict with 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 previously identified planning and zoning documents that pertain to scenic quality. These include the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Redevelopment Plan, the Citywide Urban Design Guidelines, the City of Los Angeles Walkability Checklist, and the LAMC. CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.¹¹ More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

(2) Visual Character

The analysis of visual character considers the visual character of the area immediately surrounding the Project Site and the impacts of the Project with respect to the

¹¹ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

existing aesthetic environment. The analysis considers the physical aspects of the Project and its associated regulatory requirements and project design features, described below. The analysis is based on the following three-step process:

- Step 1: Describe the massing, height, and general scale of the proposed building. Consider other factors such as setbacks and open space, which 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 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 given the proposed use, density, height, bulk, setbacks, signage, architectural style, etc.); and
- Step 3: Compare the anticipated appearance of the Project to standards within existing plans and policies which are applicable to the Project and the Project Site, including any zone changes or variances (regulatory analysis).

c. Project Design Features

No specific project design features are proposed with regard to aesthetics.

d. Analysis of Project Impacts

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project does not propose any new development along Gower Street. In addition, there would be no publicly available scenic vistas of the Hollywood Hills from Sunset Boulevard because the area is highly urbanized and developed with one- to four-story buildings (i.e., Siren Studios buildings at 6087, 6069, 6061, 6063 Sunset Boulevard) on the north side of Sunset Boulevard. Therefore, views are already obstructed along Sunset Boulevard. Finally, while there are views of the Hollywood Hills along the eastern boundary, Gordon Street, of the Project Site, these views would not be obstructed by the proposed development since the proposed garage structure would not encroach on the public right-of-way. **Therefore, impacts with respect to Threshold (a) would be less than significant. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. No further analysis is required.**

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project Site is not located along a City or state-designated scenic highway. As previously described, the nearest officially eligible State scenic highway is along the Foothill Freeway (I-210), approximately 15 miles northeast of the Project Site, and the nearest City-designated scenic highway is along Sunset Boulevard, approximately 7 miles west of the Project Site. **Therefore, no impacts with respect to Threshold (b) would occur. Moreover, in accordance with Senate Bill 743 and Zoning Information File 2452, the Project's aesthetic impacts would not be considered significant. No further analysis is required.**

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

(1) Impact Analysis

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

(a) General Plan

(i) Framework Element

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the proposed buildings would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood while enhancing the on-site functionality. The proposed buildings would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to respond to the

neighborhood fabric and would integrate a human scale and pedestrian interest through the use of integrated architectural design and landscape elements. In particular, Building A, located along Sunset Boulevard, would feature varying façade planes articulated by sawtooth glazing, non-reflective glass curtain walls, metal panels, black mullions, and exposed black steel beams. Ground level windows would use transparent glass, which would contribute to an inviting and pedestrian-oriented streetscape along Sunset Boulevard. Building A would also include landscaped outdoor decks and recessed terraces of differing sizes and depths, and high-quality architectural detailing. Overall, Building A would enhance the identity of the Sunset Gower Studios by creating a central visual focal point for the Project Site along Sunset Boulevard and improve the walkability of Sunset Boulevard through the creation of visual interest and pedestrian friendly design.

Building B and Building C, which would contain five and six stories, respectively, would be located in the central portion of the Project Site on the west side of the interior roadway, and would not be highly visible from adjacent public rights-of-way. Building B and Building C would feature distinctive massing and varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. This palette of materials would link the design of the buildings to the historic traditions of film studios. Additionally, Building B and Building C would contain landscaped terraces as well as pedestrian-scaled elements at street level, which would provide further articulation to the building façades.

The new parking structure, which would be located at the corner of Gordon Street and Fountain Avenue, would be designed to maximize efficiency and minimize visual impacts to the adjacent residential areas to the south and east. The parking structure would replace a surface staging/service area at the corner of Gordon Street and Fountain Avenue and a two-story office building located on Gordon Street. The existing chain-link fence and masonry wall along Gordon Street and Fountain Avenue would also be removed. The parking structure would be constructed of polycarbonate panels and vertical black metal fins, and would incorporate extensive landscaping within a 16-foot setback at the corner of Gordon Street and Fountain Avenue, providing a buffer between the residential uses to the south and the new parking structure. The Project would also include improvements to the three existing parking structures along Gordon Street, consisting of cosmetic improvements to the façades of the structures and the installation of landscaping, including new street trees. This would visually integrate all of the existing and proposed parking structures, thereby creating a more visually unified streetscape.

Overall, the Project would develop a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include new street trees, accent paving, seating, and other landscaping features .

Based on the above, relative to the surrounding development, the Project design would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site, and would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

(ii) Conservation Element

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Sunset Gower Studios includes a potential Historic District as well as individually historic buildings. As evaluated in Section IV.C, Cultural Resources, of this Draft EIR, after implementation of the Project, the potential historic district would continue to retain a concentration of buildings that date from the period of significance and reflect the historic identity of Columbia Studios as a "Big Eight" motion picture studio operating during the Major Studio Era. As concluded in Section IV.C, Cultural Resources, of this Draft EIR, the proposed removal of contributing buildings to the potential historic district would not reduce the integrity of the potential historic district such that it can no longer convey its historic significance. Therefore, removal of contributing buildings caused by the Project would not result in significant impacts to historic resources.

Regarding individually historic buildings within the Sunset Gower Studios, the Historical Resources Report identified three buildings on the Project Site that are eligible for historic listing as individual properties. These include the United Recording building at 6050 Sunset Boulevard; the single-story brick building at 1455 North Gordon Street; and the five-story office building at 1440 Gower Street (Building 35), which is also a contributor to the Historic District. The Project would demolish the United Recording Building at 6050 Sunset Boulevard, which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument for its association with the music recording industry in Los Angeles. Demolition of this building would result in significant impacts to a historic resource. This impact cannot be mitigated to a less-than-significant level.

Based on the above, while the Project would result in the removal of one individually historic building, the Project would retain approximately 73 percent of the contributing buildings to the potential historic district. Therefore, the Project would only partially conflict with the primary objective and policy regarding the protection of cultural and historic resources set forth in the Conservation Element. The Project would not conflict with other objectives and policies in the Conservation Element regarding obstruction of existing scenic vistas or public views of visual resources.

(b) Hollywood Community Plan

As it relates to scenic quality, the Hollywood Community Plan includes the following objective and policy:

- To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.
- That, where feasible, new power lines be placed underground and that the undergrounding of existing lines be continued and expanded.

The Project would expand upon the existing uses in Hollywood by introducing additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio-related uses. As such, the Project would support the City's objectives to perpetuate its image as the international center of the motion picture industry. Additionally, new power lines would be placed underground consistent with the public improvements section of the Community Plan.

(c) Hollywood Redevelopment Plan

Section 300 of the Hollywood Redevelopment Plan sets forth the goals of the Redevelopment Plan. Related to scenic quality, the Hollywood Redevelopment Plan provides the following goal:

5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the proposed buildings would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood while

enhancing the on-site functionality. The proposed buildings would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to respond to the neighborhood fabric and would integrate a human scale and pedestrian interest through the use of integrated architectural design and landscape elements.

In particular, Building A, located along Sunset Boulevard, would contain 18 stories and would be located along Sunset Boulevard. Building A would feature varying façade planes articulated by sawtooth glazing, non-reflective glass curtain walls, metal panels, black mullions, and exposed black steel beams. Ground level windows would use transparent glass, which would contribute to an inviting and pedestrian-oriented streetscape along Sunset Boulevard. Building A would also include landscaped outdoor decks and recessed terraces of differing sizes and depths, and high-quality architectural detailing.

The new parking structure, which would be located at the corner of Gordon Street and Fountain Avenue, would be designed to maximize efficiency and minimize visual impacts to the adjacent residential areas to the south and east. The parking structure would be constructed of polycarbonate panels and vertical black metal fins, and would incorporate extensive landscaping within a 16-foot setback at the corner of Gordon Street and Fountain Avenue, providing a buffer between the residential uses to the south and the new parking structure. The Project would also include improvements to the three existing parking structures along Gordon Street, consisting of cosmetic improvements to the façades of the structures and the installation of landscaping, including new street trees. This would visually integrate all of the existing and proposed parking structures, thereby creating a more visually unified streetscape.

Overall, the Project would develop a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include new street trees, accent paving, seating, and other landscaping features.

The Project would also implement several safety features such as an enhanced closed circuit camera system and keycard or guarded entry. Proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to, and exits from buildings, would be designed to be open and in view of surrounding sites.

Overall, the Project would support the Redevelopment Plan's goal to improve the quality of the environment.

(d) Citywide Urban Design Guidelines

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

Objective 1: Consider Neighborhood Context and Compatible Design of Uses.

The Project would develop studio/media/entertainment-related uses on a site currently used for such uses and within the Hollywood Community, the historic center of the entertainment industry. Thus, the Project would preserve studio-related uses and would not allow for intrusion of other uses.

Objective 2: Employ High Quality Architecture to Define the Character of Industrial Districts.

The Project would locate the tallest building (Building A) along Sunset Boulevard, similar to other developments in the near vicinity of the Project Site. The proposed buildings would be designed in a contemporary architectural style. Building A would feature varying façade planes articulated by sawtooth windows, glass curtain walls, and exposed black steel beams. The overall mass of Building A would be distilled into discrete volumes, thereby reducing its scale and enhancing its visual interest on the street and in the larger urban context. Further, the design would be distinguished by landscaped outdoor decks and recessed terraces providing both outdoor space and shaded retreats. In addition, the design would include varied glass profiles as well as a high level of architectural detailing that pays homage to the historic structures on the studio lot. The design of Buildings B and C would incorporate historic elements into the modern style that complements Building A. Buildings B and C would feature varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. Buildings B and C would also be distinguished by distinctive massing and landscaped terraces along with a palette of materials which link the design to the traditions of film studios.

Objective 3: Create Active Pedestrian and Employee Amenities.

The proposed landscape plan for the Project would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces, all of which could be used by employees of the site.

Objective 4: Facilitate Safe Access for Loading Areas While Buffering Pedestrians and Non-Industrial Uses.

The Project would be designed to be non-intrusive to on-site users by locating loading and trash collection facilities away from pedestrian areas.

Objective 5: Include Open Space to Create Opportunities for Pedestrian and Employee Amenities.

The proposed landscape plan for the Project would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces, all of which could be used by employees of the site.

Objective 6: Improve the Streetscape Experience by Reducing Visual Clutter.

The Project ground floor would be designed to be highly visually permeable, activating the streetscape with an active use, as well as a coherent, uniform architectural design. Wayfinding and identification signage would be consistent with the studio theme, and no off-site signage or advertisements are proposed as part of the project. Additionally, the project would include seating and planted areas along Sunset Boulevard, further activating the streetscape and improving the pedestrian environment. Additionally, the Project would include the planting of new street trees along Gower Street, Fountain Avenue, and Gordon Street. The Project would also install additional landscaping at the corner of Gordon Street and Fountain Avenue, including shrubs, groundcover, and trees.

(e) Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting. The Project would incorporate, where applicable, the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a visually appealing pedestrian environment.

The primary objective defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. While the Project is entirely contained within the boundaries of the Sunset Gower Studios, which is a closed studio campus, the Project would support the City's recommended implementation strategies related to sidewalks by not disrupting the existing continuous and predominantly straight sidewalks bounding the Project Site as well as providing a landscaped buffer at the corner of Gordon Street and Fountain Avenue. The Project would also create a buffer between pedestrians and moving vehicles, provide adequate sidewalk widths, and incorporate closely planted shade-producing street trees.

The objective of the Walkability Checklist regarding crosswalks/street crossings is to provide crossings that are safe, easy to use and well-marked to support active, pedestrian-friendly environments and link both sides of the street physically and visually. In support of this objective, the Walkability Checklist strategies regarding crosswalks and street crossings are aimed at maximizing safety and convenience. While the Project does not include crosswalks or street crossings, appropriate curbs would be provided to facilitate safe pedestrian movement, including pedestrian and bicycle access to the Project Site. The Walkability Checklist strategies regarding on-street parking do not apply to the Project.

The objective of the Walkability Checklist's utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen rooftop equipment and locate trash enclosures and utility areas within the building/parking structure, so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground. Utilities would also be located away from building entrances. As such, the Project would support the implementation strategies related to the undergrounding and screening of utilities.

Within the Walkability Checklist, building orientation addresses the relationship between buildings and the street as a means of improving neighborhood character and the pedestrian environment. In support of this objective, many of the recommended implementation strategies provided in the Walkability Checklist are aimed at providing and facilitating pedestrian access to buildings from the public right-of-way. Studio lots are generally closed to the public and public access to the campus is typically limited. Notwithstanding, in accordance with the recommended implementation strategies of the Walkability Checklist, the existing main entrance along Sunset Boulevard, which is at grade level, would be maintained after implementation of the Project. As the primary entrance, the Sunset Boulevard entrance would also continue to provide pedestrian access that is conveniently located near public transit stops adjacent to the Project Site. The primary pedestrian access at the Sunset Boulevard gate would also continue to comply with Americans with Disabilities Act (ADA) guidelines. With regard to locating buildings along the front property line, Building A, the largest building would be located along Sunset

Boulevard. Finally, the Project would use architectural features to provide continuity along the street frontage where openings in the building wall occur.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk; accommodating vehicle access to and from the site with as few driveways as possible; limiting the width of each driveway to the minimum required; incorporating architectural features on parking structure façades that respond to the neighborhood context and contribute to “placemaking;” illuminating all parking areas and pedestrian walkways; and using architectural features to provide continuity along the street frontage where openings in the building wall occur.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the landscape plan for the Project would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site. In addition, the Project would provide a landscaped open space area at the corner of Gordon Street and Fountain Avenue. Accordingly, the Project would achieve the following implementation strategies: providing canopy trees in planting areas in addition to the street trees; providing planting that complements pedestrian movement or views; and providing planting that complements the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project would address many of the relevant implementation strategies, including incorporating different textures, colors, materials, and distinctive architectural features that add visual interest; adding scale and interest to the building façade through articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; including overhead architectural features, such as awnings, canopies, trellises or cornice treatments, that provide shade and reduce heat gain; contributing to neighborhood safety by providing windows at the street that act as “eyes on the street;” and utilizing the building wall for security between the structure and the street, eliminating the need for fences at the street.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is

visible to pedestrians, assists in identifying the structure and its use, and facilitates access to building entrances; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant.

Based on the Project elements described above, the Project would not conflict with the applicable Walkability Checklist objectives and would implement relevant strategies. As such, the Project would be consistent with relevant aspects of the Walkability Checklist.

(f) LAMC

The Project Site is zoned M1-1 pursuant to the LAMC. Example land uses permitted in the M1 zone include media products, machine shops, wireless telecommunications, and limited commercial and manufacturing uses. The “-1” component of the Project Site’s zoning designation indicates the Project Site is located in Height District 1, which permits a maximum FAR of 1.5:1, with no limit on building height.

The Project Site is currently improved with motion picture, television studio, recording uses, and associated office uses which are permitted under the current zoning designation. The proposed studio/media/entertainment-related office uses would be consistent with the existing zoning and would not represent a change in use for the Sunset Gower Studios. The Project would also be within the maximum FAR permitted for the Project Site. Specifically, the Project would remove 160,611 square feet of existing floor area and develop 627,957 square feet of floor area, resulting in a net increase of approximately 466,346 square feet of floor area. When averaged across the 15.9-acre portion of the Project Site for which entitlements are requested, the 15.9-acre portion of the Project Site would have a FAR of 1.47:1, which would be below the existing FAR limitation of 1.5:1.¹²

With respect to setback regulations, buildings erected and used exclusively for commercial or industrial purposes in the M1 zone do not require front, side, or rear yard setbacks.

Based on the above, the Project would not conflict with LAMC requirements.

¹² *The Project’s FAR is calculated based on the 15.9-acre portion of the Project where new buildings are proposed and across which the floor area is being averaged, which is the only portion of the Project Site owned by the Applicant, and the portion of the Project Site to which the entitlements are being sought.*

(g) Conclusion

Based on the discussion above, the Project would not conflict with the zoning and other regulations governing scenic quality. Moreover, pursuant to SB 743 and ZI File No. 2452, Project impacts would not be considered significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

No Project-level impacts related to a conflict with applicable zoning and other regulations governing scenic quality were determined to occur. Therefore, no mitigation measures were required or included.

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

As previously noted, subsequent to the release of the Initial Study for the Project, the State CEQA Guidelines Appendix G threshold questions have been updated. The prior Appendix G threshold included in the Initial Study has been replaced by a new threshold question that considers whether a project would conflict with applicable zoning and other regulations governing scenic quality, as discussed above. However, as the Initial Study prepared for the Project stated that the Project's potential effects related to visual character and quality would be addressed in the EIR, this analysis is included here for information purposes only.

(1) Impact Analysis

(a) Applicable Design Characteristics

The proposed creative office, production office/production support, and storage uses would be provided within three new buildings (referred to herein as Building A, Building B, and Building C). Building A, which would be located along Sunset Boulevard, would be the tallest of the structures, consisting of 18 stories with a height of 300 feet. Building B, which would be centrally located within the Project Site, would be five stories with a height of approximately 89 feet. Building C would also be located within the central area of the Project Site, and would be six stories with a height of approximately 89 feet. A new bicycle parking facility would also be constructed within the central area of the Project Site and would be one story tall with a maximum height of approximately 23 feet. The Project also

includes construction of a parking structure that would be located in the southeastern portion of the Project Site, at the corner of Gordon Street and Fountain Avenue. The parking structure would consist of six above-grade stories with a height of approximately 89 feet. In addition, the Project would add architectural treatment to the existing parking structures fronting Gordon Street to extend the design aesthetic of the new parking structure to create a cohesive façade.

The proposed buildings would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood while enhancing the on-site functionality. As shown in the building elevations included as Figure IV.A-3 through Figure IV.A-7 on pages IV.A-30 through IV.A-34, the proposed buildings would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials. Specifically, Building A, illustrated in Figure IV.A-3 and Figure IV.A-4 on pages IV.A-30 and IV.A-31, would feature varying façade planes articulated by sawtooth glazing, non-reflective glass curtain walls, metal panels, black mullions, and exposed black steel beams. Ground level windows would use transparent glass, which would contribute to an inviting and pedestrian-oriented streetscape along Sunset Boulevard. As depicted in Figure IV.A-5 and Figure IV.A-6 on page IV.A-32 and IV.A-33, Building B and Building C would also feature varying façade planes articulated by steel-frame windows, sawtooth glazing, non-reflective glass curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. The façade at grade would feature black industrial sash windows with transparent glazing that are operable, creating an appropriate pedestrian scale that fits within the historic context. The proposed parking structure would be characterized by vertical black metal fins and polycarbonate panels, as depicted in Figure IV.A-7 on page IV.A-34. The Project would also include façade improvements to the existing parking structures to create a visually unified streetscape along Gordon Street.

(b) Visual Simulations Descriptions

To supplement the analysis of the Project's potential impacts related to visual character provided below, visual simulations of the Project at buildout are provided in Figure IV.A-9 through Figure IV.A-18 on pages IV.A-36 through IV.A-45. A view location map showing the locations of each vantage point is provided in Figure IV.A-8 on page IV.A-35. The visual simulations are based on an architectural 3-D digital model of the Project and are intended to generally depict the Project's building heights and massing in the context of the surrounding area. A corresponding photograph showing the existing view for comparison is also included in Figure IV.A-9 through Figure IV.A-18. The following discussion summarizes the principal characteristics of each view

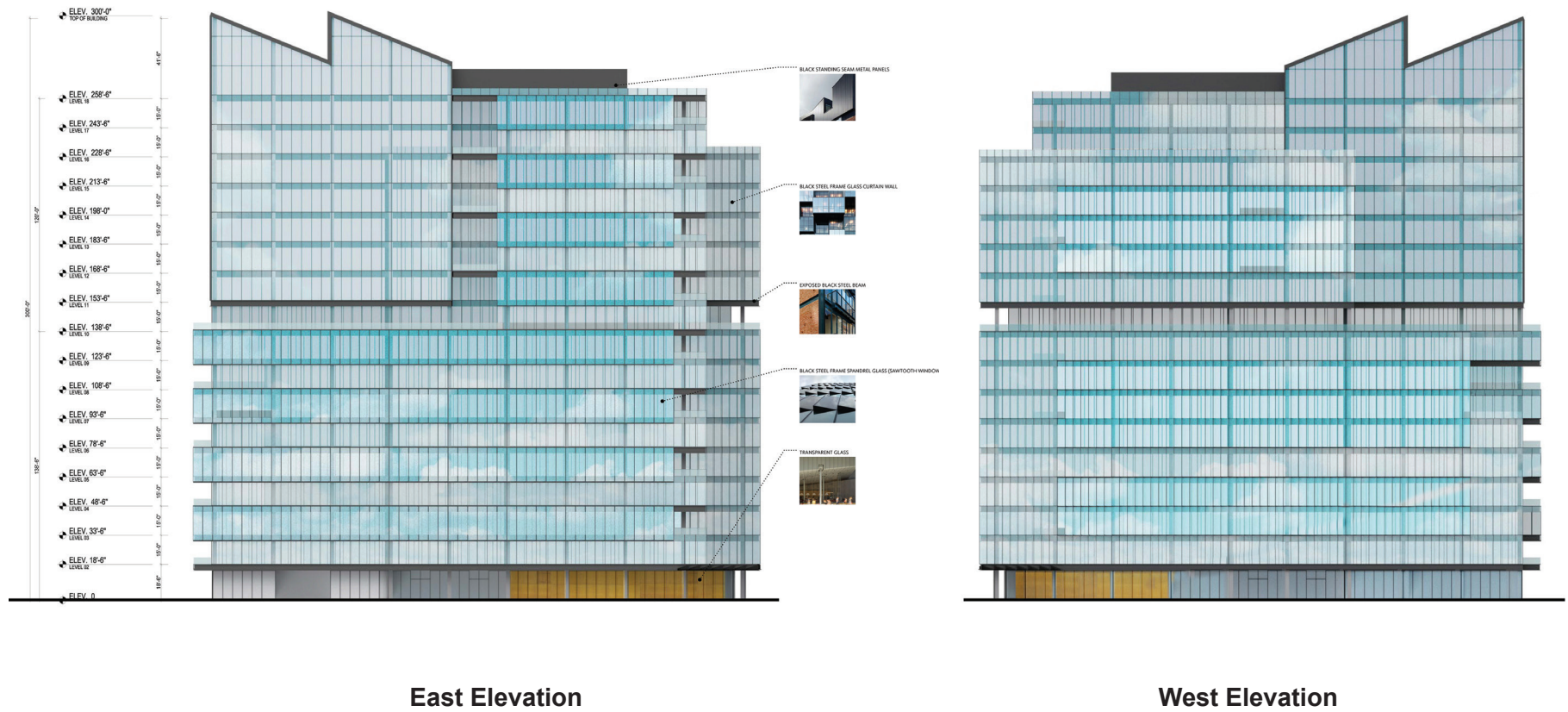
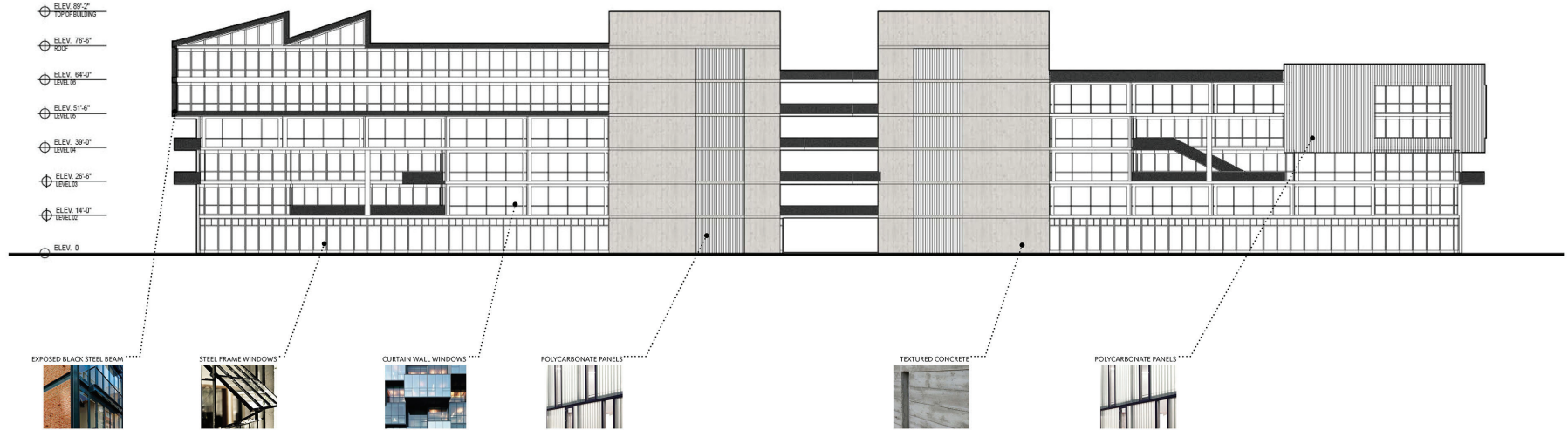


Figure IV.A-4
Building A Elevations – East and West



East Elevation



West Elevation

Figure IV.A-5
Building B and Building C Elevations – East and West

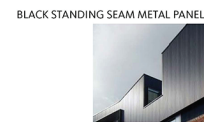
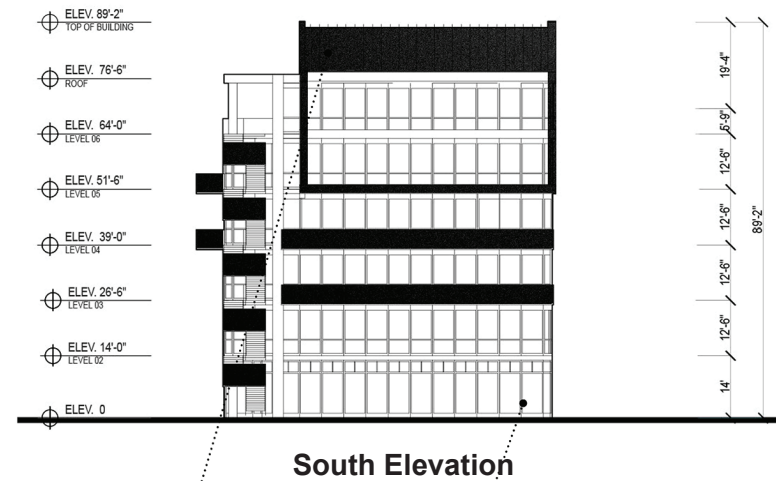
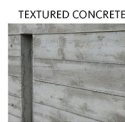
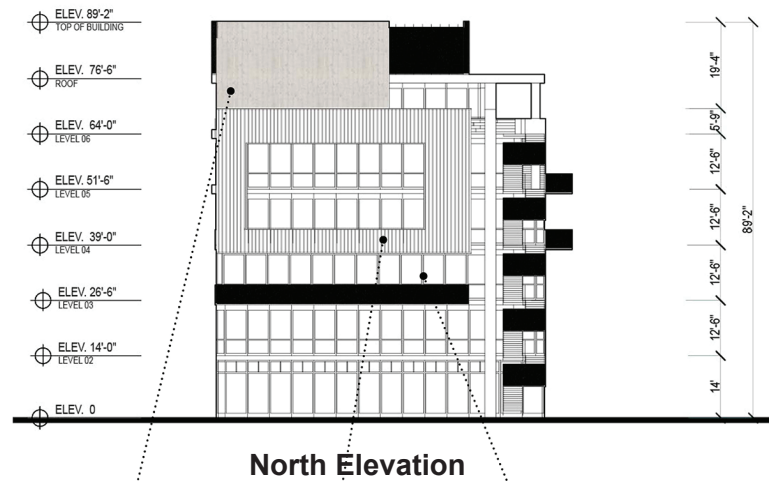


Figure IV.A-6
Building B and Building C Elevations – North and South

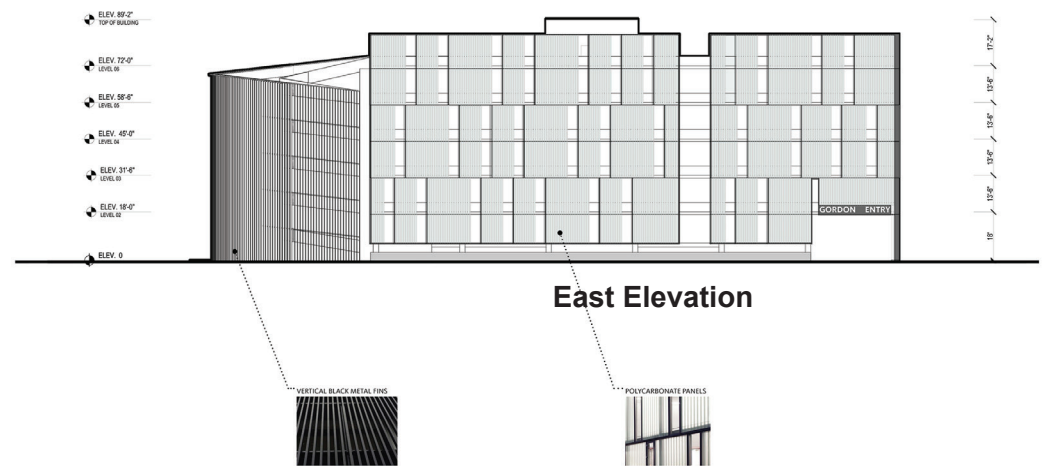
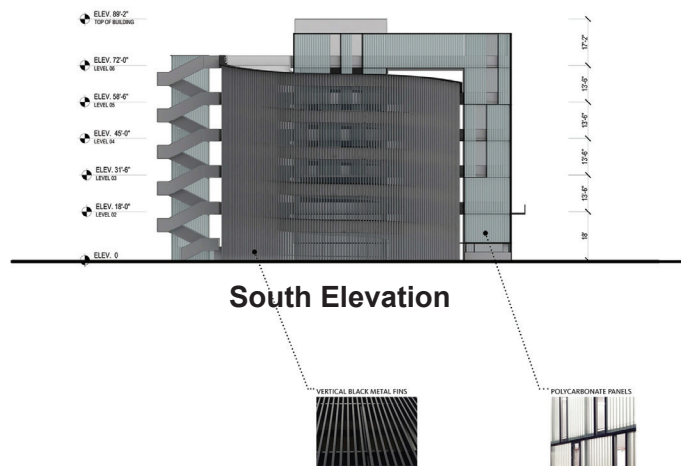


Figure IV.A-7
Parking Structure Elevations – South and East

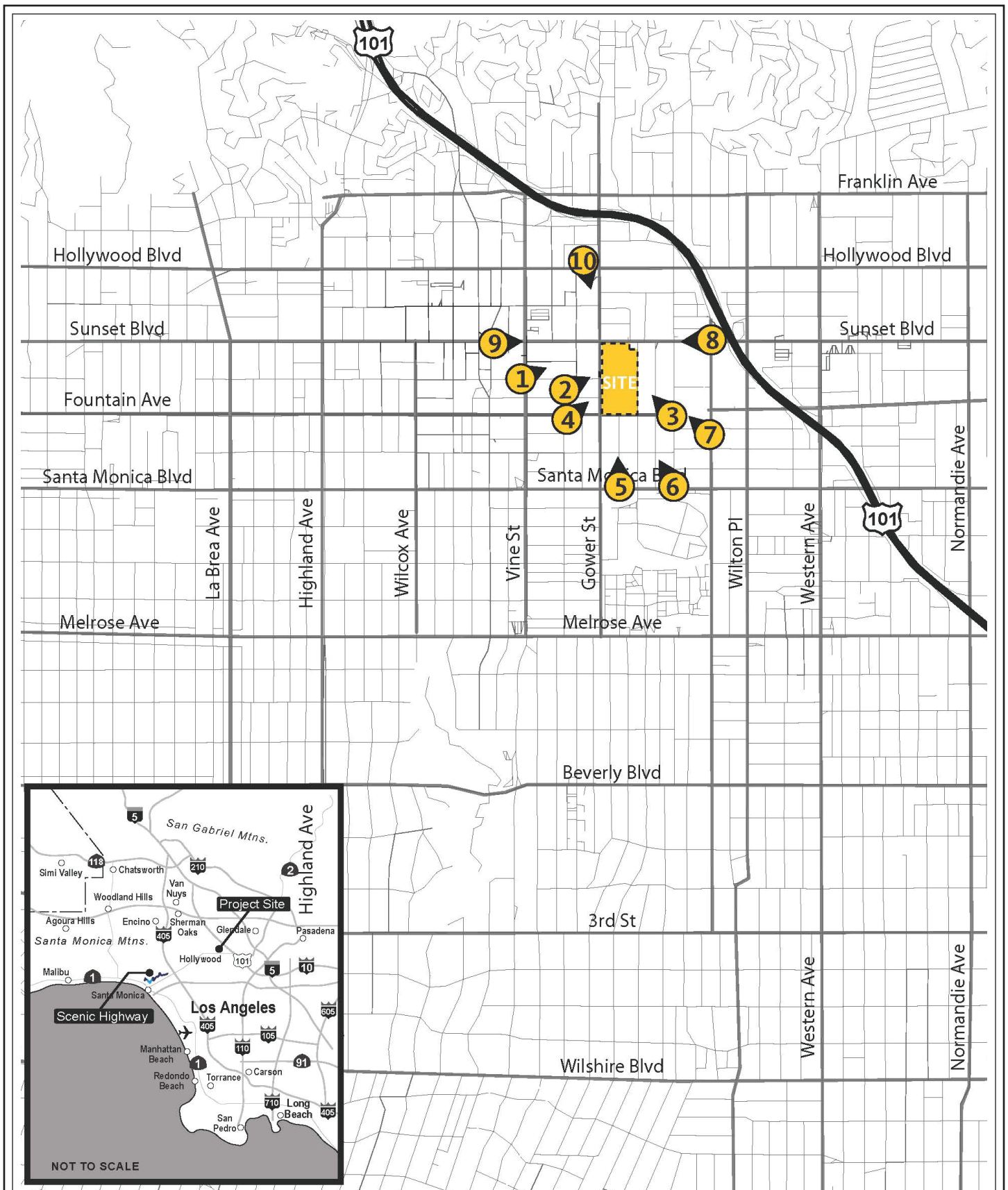
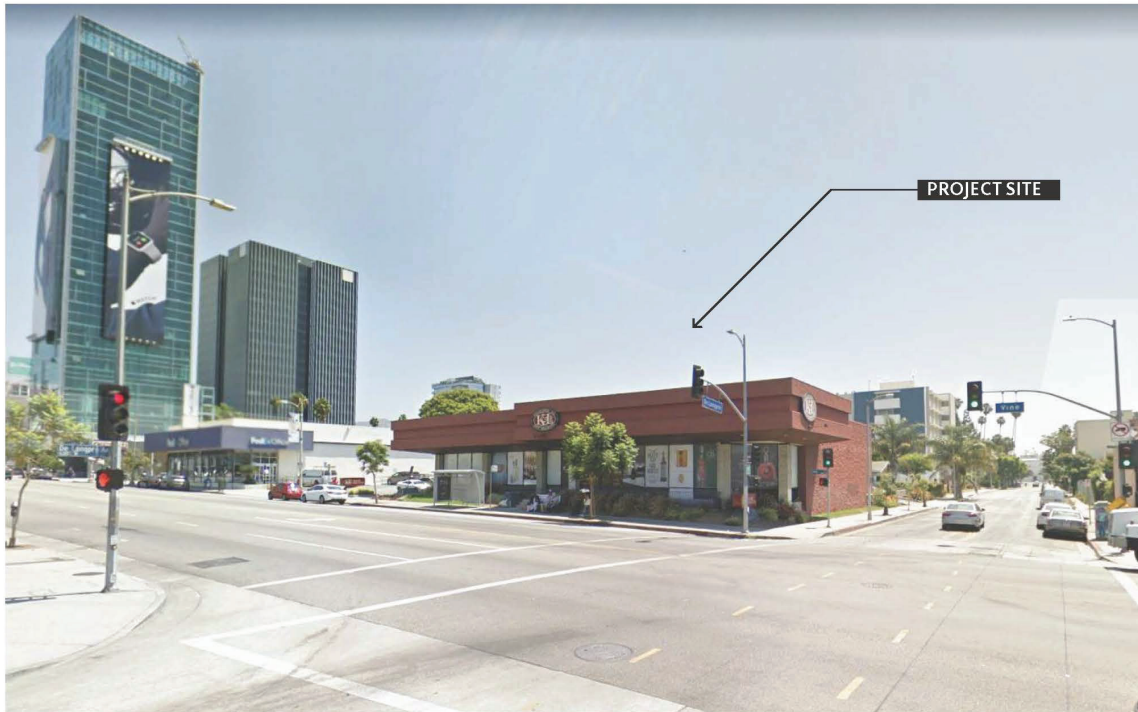
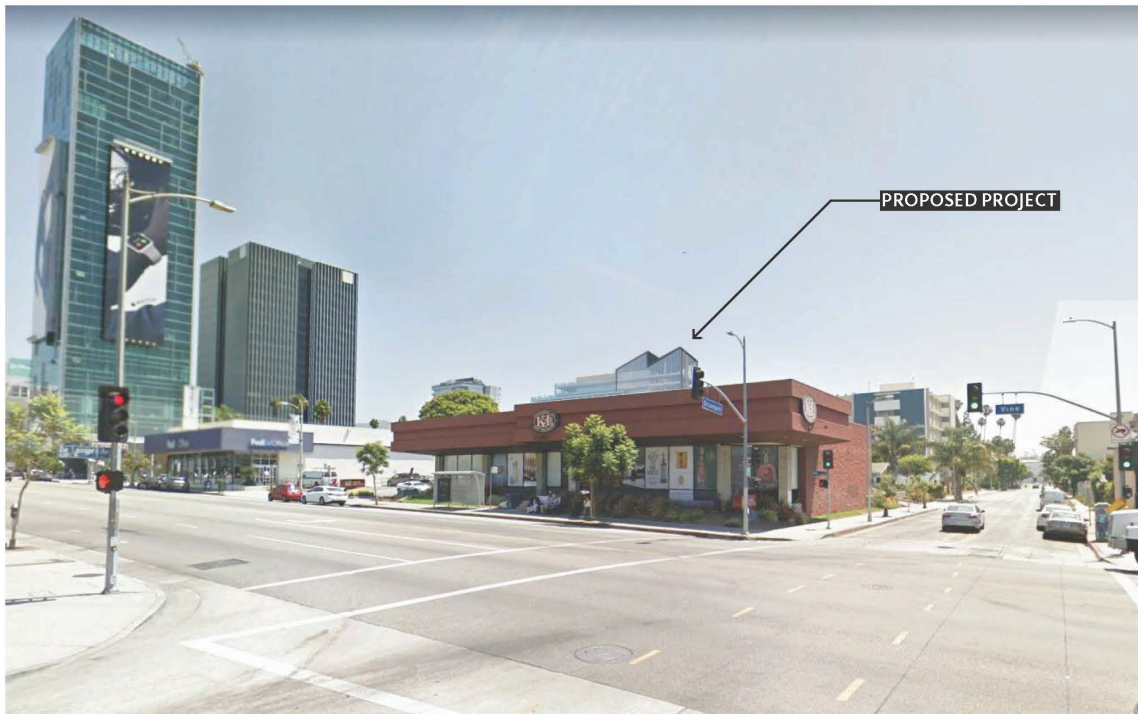


Figure IV.A-8
View Location Map



EXISTING



PROPOSED

Figure IV.A-9
Existing and Proposed Views – Location 1



EXISTING



PROPOSED

Figure IV.A-10
Existing and Proposed Views – Location 2



EXISTING



PROPOSED

Figure IV.A-11
Existing and Proposed Views – Location 3



EXISTING



PROPOSED

Figure IV.A-12
Existing and Proposed Views – Location 4



EXISTING



PROPOSED

Figure IV.A-13
Existing and Proposed Views – Location 5



EXISTING



PROPOSED

Figure IV.A-14
Existing and Proposed Views – Location 6

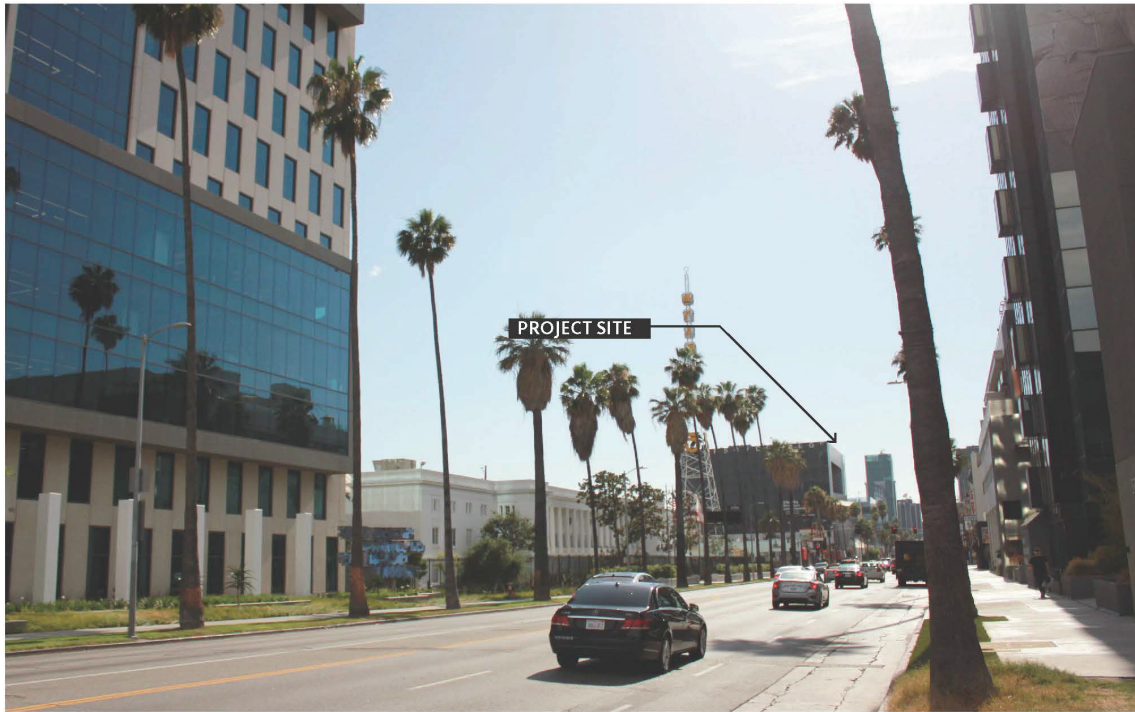


EXISTING



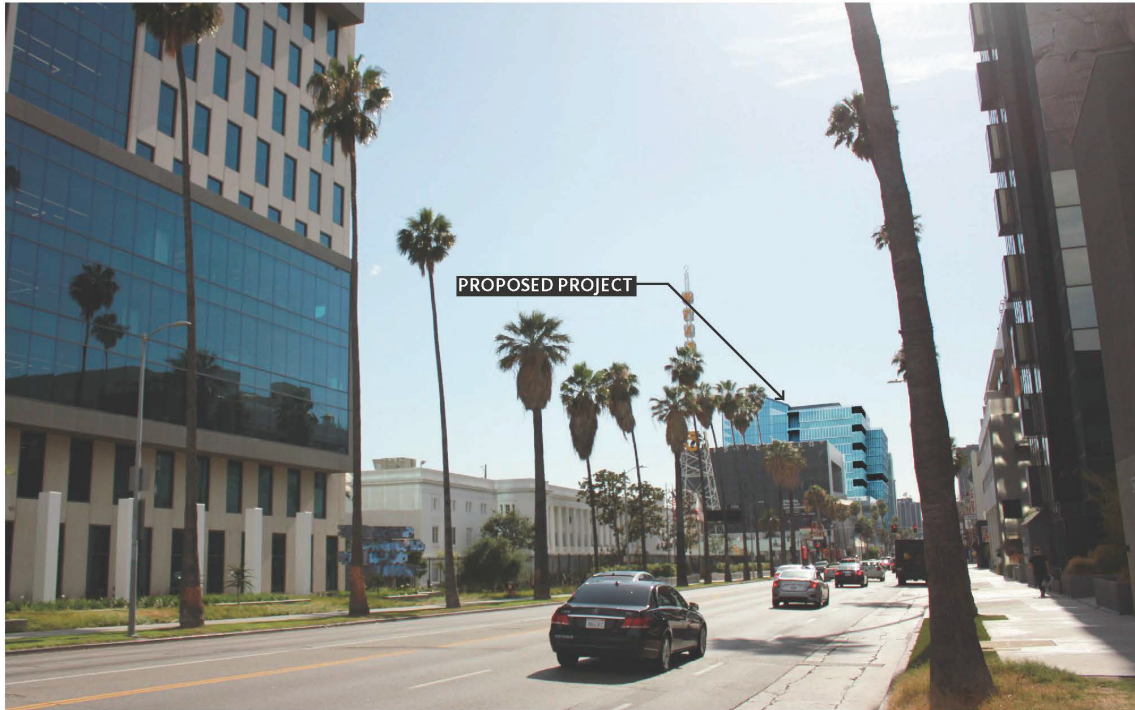
PROPOSED

Figure IV.A-15
Existing and Proposed Views – Location 7



PROJECT SITE

EXISTING



PROPOSED PROJECT

PROPOSED

Figure IV.A-16
Existing and Proposed Views – Location 8



EXISTING



PROPOSED

Figure IV.A-17
Existing and Proposed Views – Location 9



EXISTING



PROPOSED

Figure IV.A-18
Existing and Proposed Views – Location 10

- **View 1: Looking Northeast from Vine Street and De Longpre Avenue.** As shown in Figure IV.A-9 on page IV.A-36, only limited portions of Building A would be visible in the background and would appear consistent with the mixed scale of the surrounding buildings. Buildings B and C, which would be located internal to the Project Site, would not be visible.
- **View 2: Looking Northeast from El Centro Avenue and De Longpre Avenue.** As shown in Figure IV.A-10 on page IV.A-37, similar to View 1, only a limited portion of Building A would be visible in the background of this view. Buildings B and C would not be visible.
- **View 3: Looking Northwest from Bronson Avenue and Fountain Avenue.** As shown in Figure IV.A-11 on page IV.A-38, similar to Views 1 and 2 discussed above, only a portion of Building A would be visible in the background.
- **View 4: Looking Northeast from Fountain Avenue and Lodi Place.** As shown in Figure IV.A-12 on page IV.A-39, while Building A would appear more prominently in this view, it would be designed to include variations in the façade of the building such that lower elements would be placed on the sides of the building while the tallest component would be along Sunset Boulevard, consistent with other high rise buildings fronting Sunset Boulevard. Overall, as illustrated in this view, the Project would be consistent with the variety of buildings and scale that comprise the area surrounding the Project Site.
- **View 5: Looking North from Santa Monica Boulevard and Beachwood Drive.** As shown in Figure IV.A-13 on page IV.A-40, similar to other views in the surrounding area, only a very limited portion of Building A would be visible along Santa Monica Boulevard. In addition, as illustrated, the Project would not block existing views of the Hollywood Hills.
- **View 6: Looking North from Santa Monica Boulevard and Bronson Avenue.** As shown in Figure IV.A-14 on page IV.A-41, the Project would not be visible from this location and existing views of the Hollywood Hills would remain.
- **View 7: Looking Northwest from Van Ness Avenue and La Mirada Avenue.** As shown in Figure IV.A-15 on page IV.A-42, similar to other views in the surrounding area, only a very limited portion of Building A would be visible along Santa Monica Boulevard.
- **View 8: Looking West along Sunset Boulevard, near Van Ness Avenue.** As shown in Figure IV.A-16 on page IV.A-43, the scale of Building A would be more visible from this location given the building's placement along the Sunset Boulevard frontage. However, as illustrated, the scale, massing, and height of Building A would be consistent with the variety of building types and scales that make up the Sunset Boulevard corridor in this area. Building A would also incorporate façade treatments, including variations in building planes and stepbacks that would reflect the mix of buildings in the surrounding area.

- **View 9: Looking East along Sunset Boulevard, near Morningside Court.** As shown in Figure IV.A-17 on page IV.A-44, while Building A would be visible in this location, its design would be compatible with and would complement the existing buildings located along Sunset Boulevard that are similarly sized. As such, Building A would appear as an extension of the existing aesthetic character that reflects the Sunset Boulevard corridor in this area.
- **View 10: Looking Southeast from Hollywood Boulevard, near Gower Street.** As shown in Figure IV.A-18 on page IV.A-45, similar to View 9 described above, Building A would also appear more prominently in this location but would be designed to reflect the existing aesthetic and visual character of the buildings surrounding the Project Site. As such, Building A would appear as an extension of the existing aesthetic character that reflects this area surrounding the Project Site.

(c) Project Impacts

(i) Construction

Construction activities generally cause a temporary contrast to and disruption in the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community.

Construction of the Project would require that a portion of the Project Site be cleared. Specifically, as illustrated in Figure II-4 in Section II, Project Description, of this Draft EIR, the Project would demolish 21 existing buildings comprising approximately 160,611 square feet of existing floor area. Additionally, approximately 1,400 square feet of existing service areas would be removed. As evaluated in the Historic Resources Technical Report included in Appendix C of this Draft EIR, one of the buildings proposed to be removed (6050 Sunset Boulevard) is considered a historic resource. The 6050 Sunset Boulevard building is located along Sunset Boulevard and is visible from public vantage points. As such, during construction activities for the Project, the visual character and quality of the Project Site would be altered due to the removal of the existing structures; site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures. While most of the demolition and construction activities would occur within the internal, central portion of the Project Site, some would occur along Sunset Boulevard, Gordon Street, and Fountain Avenue. Thus, some construction activities would be visible to pedestrians and motorists on these adjacent streets, as well as to viewers within nearby buildings. However, the appearance of the Project Site during construction would be typical of construction sites in urban areas, and aside from vertical building construction, not substantially different than existing conditions. Furthermore, construction activities would be temporary in nature, and the visual impacts associated with construction activities would cease upon the completion of the Project's construction phase. In addition, the Project

would include the installation of temporary construction fencing along the periphery of the Project Site to screen construction activity from view at street level, as provided above in AES-PDF-1. Also, as set forth in AES-PDF-2, any pedestrian walkways and construction fencing accessible or visible to the public would be maintained in a visually attractive manner (i.e., free of trash, graffiti, and peeling postings and a uniform paint color or graphic treatment) throughout the construction period. Further, pursuant to AES-PDF-3, any outdoor lighting used during construction would be shielded, as appropriate, during construction.

The Project would also require the removal of ornamental trees within the Project Site. The removal of these trees could temporarily reduce the visual quality of the Project Site during the construction phase of the Project to the extent such trees are visible from public rights-of-way. However, all existing trees to be removed within the Project Site would be replaced on at least a 1:1 basis in accordance with City requirements. While not anticipated, should any street trees be removed, street trees would be replaced on a 2:1 basis in accordance with City policy. In addition, the Project would provide ample on-site landscaping to enhance the streetscape, including a landscaped paseo, a central plaza area, courtyards, and rooftop gardens and terraces. As such, the removal of existing on-site trees during construction of the Project would not substantially or permanently alter or degrade the existing visual character of the Project area.

Overall, Project construction would not substantially degrade the existing visual character or quality of the Project Site and surrounding area. Moreover, under Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant.

(ii) Operation

The Project Site is currently developed with dozens of buildings, which house office space, production support space, and sound stages. Additionally, there are service areas and three parking structures located on the Project Site. Most of the sound stages are located along Gower Street, and the parking structures are located along Gordon Street, with the creative office and production support uses dispersed in buildings that are mostly centrally located on the Project Site. The Project Site spans a city block, not including the building on the northeast corner, with buildings and parking structures located along the periphery of the Project Site. As such, the internal portion of the Project Site is generally not visible from the surrounding area. Limited street-level visual access to the Project Site is available at the driveway on Beachwood Drive located along Sunset Boulevard.

The Project would demolish 21 buildings comprising approximately 160,611 square feet and would introduce three new buildings that would comprise 627,957 square feet of floor area, a parking structure that would contain approximately 525 parking spaces, and a

bicycle parking facility. As discussed above, the existing 6050 Sunset Boulevard building is considered a historic resource. The City's L.A. CEQA Thresholds Guide states that historic resources may contribute to the visual character of an area. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the 6050 Sunset Boulevard building derives its historic resource status from the recording activities that it housed starting in the late 1950s and not from architectural significance. The 6050 Sunset Boulevard building, a two-story, wood frame building with an asymmetrical façade, does not contribute to the visual character or quality of the Project Site or surroundings. Accordingly, the demolition of the 6050 Sunset Boulevard building would not result in the loss of a unique visual resource and would not substantially degrade the visual character or quality of the Project Site and its surroundings.

With regard to the visual character of the surrounding uses, as shown in the visual simulations provided above in Figure IV.A-9 through Figure IV.A-18 on pages IV.A-36 through IV.A-45, the proposed buildings would be designed in a contemporary architectural style that would feature compatible massing, heights, and design elements that would be appropriate with the context of the surrounding uses. The new buildings would be designed to respond to the neighborhood fabric and would integrate a human scale and pedestrian interest through the use of integrated architectural design and landscape elements. Specifically, the tallest building (Building A), would be located along Sunset Boulevard, where the 18-story structure would be consistent in scale with other developments along Sunset Boulevard, which includes a dense mix of low-, mid-, and, currently, mostly high-rise buildings. Building A would incorporate design elements that would complement the urban environment of the Hollywood area and its location on Sunset Boulevard, by the scale of the ground floor elements, the high degree of building articulation and the incorporation of varied building materials. Furthermore, while Building A would result in an increase in height, density, and mass as compared to existing conditions, the building would modulate its mass through the variations in the rhythm of façade elements, including changes in building planes, changes of material, and other architectural features to reduce the effect of its height, enhance visual interest, create a relationship to surrounding buildings, and provide a pedestrian scale adjacent to public streets. Specifically, Building A would incorporate discrete volumes and varying façade planes articulated by changes in the roof heights and shapes, sawtooth windows, non-reflective glass curtain walls, metal panels, black mullions, and exposed black steel beams. Building A would also include landscaped outdoor decks and recessed terraces of differing sizes and depths, and high-quality architectural detailing. Overall, Building A would enhance the identity of the Sunset Gower Studios by creating a central visual focal point for the Project Site along Sunset Boulevard and improve the walkability of Sunset Boulevard through the creation of visual interest and pedestrian friendly design.

Building B and Building C, which would contain five and six stories, respectively, would be located in the central portion of the Project Site on the west side of the interior

roadway. Building B and Building C would feature distinctive massing and varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels. This palette of materials would link the design of the buildings to the historic traditions of film studios. Additionally, Building B and Building C would contain landscaped terraces as well as pedestrian-scaled elements at street level, which would provide further articulation to the building façades. While Building B and Building C would have different architectural requirements than Building A, all of the proposed buildings would share architectural similarities that create an identity for Sunset Gower Studios and a composed and harmonious vista for those outside the Sunset Gower Studios.

The new parking structure, which would be located at the corner of Gordon Street and Fountain Avenue, would be designed to maximize efficiency and minimize visual impacts to the adjacent residential areas to the south and east. The parking structure would replace a surface staging/service area at the corner of Gordon Street and Fountain Avenue and a two-story office building located on Gordon Street. The existing chain-link fence and masonry wall along Gordon Street and Fountain Avenue would also be removed. The parking structure would be constructed of polycarbonate panels and vertical black metal fins, and would incorporate extensive landscaping within a 16-foot setback at the corner of Gordon Street and Fountain Avenue, providing a buffer between the residential uses to the south and the new parking structure. The Project would also include improvements to the three existing parking structures along Gordon Street, consisting of cosmetic improvements to the facades of the structures and the installation of landscaping, including new street trees. This would visually integrate all of the existing and proposed parking structures, thereby creating a more visually unified streetscape. Furthermore, the removal of the surface staging area and perimeter fencing would positively contribute to the overall visual character of the area.

Overall, relative to the surrounding development, the Project design would complement the varying design elements of both the commercial and residential uses adjacent to the Project Site. Specifically, as described above, the tallest proposed structure would be located along Sunset Boulevard, where it would be compatible in scale to several buildings along, and north of, Sunset Boulevard. With regard to massing, the Project would result in greater density and scale of development at the Project Site when compared with existing conditions. However, the Project would provide infill development within a dense urban setting that would be consistent in scale and height with development occurring along Sunset Boulevard, where the majority of the Project's new development will be focused. Furthermore, the design of each building would incorporate ground-level design elements, including transparent windows and a variety of exterior textures and finishes that would enhance the pedestrian environment.

Project landscaping would further add to the enhanced visual environment. As previously described, the Project would include a variety of landscaped gathering areas, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site. The Project would also include the addition of street trees along Gower Street, Fountain Avenue, and Gordon Street that would be consistent with the existing street trees.

The Project would incorporate signage consistent with the signage regulations of the LAMC, including the location of signs, size of signs, sign illumination, and types of signage. Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site. Signage would be visually integrated with the proposed development on the Project Site and would further add visual interest and texture to building façades. In addition, signage along the street frontages would be of a proper scale to motorists and pedestrians.

In summary, development of the Project's buildings and associated landscaping would allow for the integration of the Project Site, providing a visually unified space while modernizing and improving the functionality of the studio. All of the buildings would be designed to respond to the context of the area in which they are located through the incorporation of appropriate design elements that would complement the surrounding existing urban environment. The Project would not result in the removal of any resources that contribute to the visual character of the surrounding area and the Project's design, massing, and scale would be compatible with the existing uses that set the aesthetic character of the Project Site vicinity. **Therefore, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings. Moreover, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

No Project-level impacts related to a substantial degradation of the existing visual character or quality of the site and its surroundings were determined to occur. Therefore, no mitigation measures were required or included.

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site currently generates moderate levels of artificial light and glare from low-level security lighting, and glass building surfaces. Although the Project would introduce new exterior lighting on the buildings and along pathways, the outdoor lighting would be low-level and not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor lighting would be shielded such that the light source cannot be seen from adjacent residential properties to the south and east of the Project Site, or the public right-of-way, and would be dark-sky compliant.

Additionally, while the new Project buildings would feature glass surfaces, the sawtooth windows and curtain walls would minimize the use of mirror coatings. There would be no other use of highly polished surfaces since the rest of the elevations of Buildings A, B, and C would feature black standing seam metal panels and exposed black steel beams and the proposed parking structure would feature polycarbonate panels and vertical black metal fins. In addition, only a part of the proposed new development would occur adjacent to streets. Specifically, only proposed Building A would front Sunset Boulevard, while the proposed parking structure at the corner of Fountain Avenue and Gordon Street would feature an approximate 16-foot landscaped buffer along Gordon Street. Meanwhile, Buildings B, C, and the bike parking facility would be located entirely within the Project Site and away from any adjacent streets.

Based on the above, lighting and glare associated with the Project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts with respect to Threshold (d) would be less than significant. Moreover, in accordance with Senate Bill 743 and Zoning Information File 2452, the Project's aesthetic impacts would not be considered significant. No further analysis is required.

e. Cumulative Impacts

(1) Impact Analysis

As discussed in Section III, Environmental Setting, of this Draft EIR, there are 105 related projects in the vicinity of the Project Site. Much of this growth is anticipated by the City and will be incorporated into the Hollywood Community Plan update (Related Project No. 105), which the Department of City Planning is in the process of preparing (refer to Section IV.G, Land Use and Planning, of this Draft EIR for further discussion). The Hollywood Community Plan Update proposes changes that would primarily increase

commercial and residential development potential in and near the Regional Center Commercial portion and along selected corridors of the Hollywood Community Plan area. Decreases in development potential would be primarily focused on low- to medium-scale multi-family residential neighborhoods to conserve the existing density and intensity of those neighborhoods.

As shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, while many of the related projects are located a substantial distance from the Project Site, there are numerous related projects located within a few blocks of the Project Site. These projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office and production, and hotel developments. While precise building designs are not yet known for much of the development proposed in the area, based on the nature of the proposals, it is likely that the height, mass, and scale of the buildings would be varied and would include low-, mid-, and high-rise structures, similar to existing development in the area. However, only those projects located sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or could affect the same off-site sensitive uses could pose cumulative effects in conjunction with the Project. Related Project Nos. 42, 48, 68, and 83 are the closest in proximity to the Project Site. Related Project No. 42 is a mixed use office and grocery store development located at 5901 Sunset Boulevard; Related Project No. 48 is a residential and commercial development located at 6201 Sunset Boulevard; Related Project No. 68 is a mixed-use residential and commercial development located at 5939 Sunset Boulevard; and Related Project No. 83 is a mixed-use residential and commercial development located at 6200 Sunset Boulevard. These proposed developments comprise a variety of uses that are consistent with existing uses in the area.

(a) Scenic Vistas

As previously discussed, visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign to the north of the Project Site and historic resources within the Hollywood area, including potential historic resources and a potential historic district on the Project Site. However, as discussed above, access to these visual resources is limited due to relatively flat topography and dense urban development. As such, existing northerly views of the Hollywood Hills and Hollywood Sign are primarily only available from area roadways where there are gaps between existing buildings, including along Gower Street, located adjacent to the Project Site on the west, Vine Street, located approximately 0.2 mile west of the Project Site, and Bronson Avenue, located approximately 0.1 mile east of the Project Site. Focal views of visual resources are largely limited to adjacent properties.

In general, related projects have the potential to block views from local streets and other public vantages throughout a project area. However, as development of the Project

and related projects would result in further infilling of the area, any potential view obstruction of visual or scenic resources would be limited and intermittent. The views most likely to be affected on a cumulative basis are views of the Hollywood Hills and the Hollywood Sign to the north. However, as views of these resources are largely limited to roadways, it is likely that the development of the related project would not significantly affect views of the Hollywood Hills and the Hollywood Sign.

Based on the discussion above, given the location of related projects to the Project Site and the identified visual resources in the vicinity of the Project Site, the Project and related projects would not have a substantial adverse effect on a scenic vista. Therefore, impacts would be less than significant. Moreover, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant and would not contribute toward a cumulatively considerable impact.

(b) Scenic Resources within a State Scenic Highway

As discussed above, the Project Site is not located along a scenic highway as designated by the state and the nearest officially eligible state scenic highway is approximately 15 miles northeast of the Project Site.¹³ The related projects are all located within a limited radius of the Project Site and also would not be located along or in close proximity to a state-designated scenic highway. **As such, the Project and related projects would not substantially damage scenic resources within a state-designated scenic highway. Therefore, impacts to scenic resources within a state scenic highway would be less than significant. Moreover, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant and would not contribute toward a cumulatively considerable impact.**

(c) Conflict with Regulations Governing Scenic Quality

As with the Project, the related projects would be required to comply with relevant regulations governing scenic quality through review by City regulatory agencies, and would be subject to CEQA review. In addition, as the Project would generally be consistent 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, cumulative impacts related to consistency with regulations governing scenic quality would be less than significant.**

¹³ *California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed May 9, 2019.*

(d) Visual Character¹⁴

Cumulative impacts regarding aesthetics may occur if any of the related projects are located in close enough proximity to the Project Site to combine with the Project and result in significant adverse changes in the visual character or quality of the surrounding area. Generally speaking, due to the relatively dense urban development in the area, most of the related projects would not be located sufficiently close to the Project Site to noticeably enter the same field of view as the Project. With respect to visual character and quality, the nearby related projects would be consistent with the existing uses in the Project area and it is expected that they would be generally representative of the existing character of the area. Many of the related projects, including those related projects located closest to the Project Site, represent infill development, rather than introduce new development characteristics to the Project area. **Therefore, the Project and related projects would not substantially degrade the existing visual character or quality of the site and its surroundings. Moreover, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant, and the Project would not contribute toward a cumulatively considerable impact.**

(e) Light and Glare

Development of the Project combined with the related projects 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.

With regard to light, as previously described, the Project Site is located within the highly urbanized Hollywood community, with urban lighting characteristics exhibiting high ambient nighttime light levels. As the Project and related projects would include typical land uses for the Project area, they 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 high ambient nighttime artificial light levels already present. Furthermore, the Project and all related projects would adhere to applicable City requirements regarding lighting, as discussed above, which would control potential artificial light sources to a sufficient degree so as not to be considered cumulatively considerable.

¹⁴ *Subsequent to release of the Initial Study, the State CEQA Guidelines Appendix G threshold questions have been updated, including a modification to the question regarding a project's effects on visual character and quality. For informational purposes, and not for determining whether the Project and related projects would result in significant impacts to the environment, this subsection of this Draft EIR addresses the Project and related projects potential effects relative to the previous Appendix G threshold question regarding the effects on visual character and quality.*

Similarly with regard to glare, the Project's and nearby related projects' proposed uses are compatible with other development in the urban environment. It is anticipated that all projects within the City would be subject to discretionary review to ensure that significant sources of glare are not introduced. Furthermore, it is anticipated that all projects would include standard design features related to the use of low-level lighting and shielding, as well as use of low- or non-reflective surfaces, to minimize the potential for glare.

Based on the above, the Project and related projects would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant. Moreover, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant. Therefore, the Project's contribution to light and glare impacts would not be cumulatively considerable.

(2) Mitigation Measures

Cumulative impacts related to aesthetics would be less than significant. Additionally, in accordance with Senate Bill 743 and ZI File 2452, such impacts are deemed not significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to aesthetics were determined to be less than significant without mitigation. In addition, in accordance with Senate Bill 743 and ZI File 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.