

IV. Environmental Impact Analysis

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A. Aesthetics

1. Introduction

This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community; identifies applicable laws, regulations, guidelines and policies relating to aesthetics; and evaluates potential aesthetic impacts related to implementation of the Project, including whether the Project would conflict with applicable zoning and other regulations governing scenic quality and the Project's potential to create a new source of substantial light and glare. These topics are described in more detail below. The Project's potential impacts related to a substantial adverse effect on a scenic vista and potentially damaging scenic resources within a scenic highway were fully evaluated in the Initial Study prepared for the Project included in Appendix A of this Recirculated Draft EIR, and determined to result in a less than significant impact. This analysis included in the Initial Study prepared for the Project is summarized below.

The City of Los Angeles Department of City Planning previously prepared a Draft EIR for the Project, which was circulated for public review in March 2019. In response to public input, the project previously evaluated in the Draft EIR has been modified to include a second development option (referred to as Option B). As such, the City has prepared this Recirculated Draft EIR that addresses the project previously evaluated in the Draft EIR (now referred to as Option A) as well as Option B. It is noted that as part of the State CEQA Guidelines update, which became effective on December 28, 2018, Aesthetics Threshold (c) included in Appendix G of the CEQA Guidelines was modified, including to differentiate between urbanized and non-urbanized areas. Specifically, 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related to the substantial degradation of the existing visual character or quality of a site and its surrounding has been replaced by a new threshold question that considers whether a project located in an urbanized area would conflict with applicable zoning and other regulations governing scenic quality. For non-urbanized areas, Threshold (c) addresses whether a project would substantially degrade the existing visual character or quality of the site and its surroundings. As the Project Site is in an urbanized area, the analysis included in this Recirculated Draft EIR addresses whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

a. Scenic Vistas

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

b. Scenic Resources

Scenic resources refer to natural or manmade features of high aesthetic quality. Such features can include landscaping, heritage trees, or natural trees and landforms, as well as historic buildings and other structures with aesthetic value. Pursuant to CEQA Guidelines Appendix G, this area of consideration includes specific mention of such natural or manmade features when they are located within the viewshed of a State scenic highway.

c. Scenic Quality

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

d. Light and Glare

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

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials,

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

2. Environmental Setting

a. Regulatory Framework

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

- Senate Bill No. 743
- Assembly Bill 1560
- California Scenic Highways
- California Historic Parkways
- California Art Preservation Act
- General Plan Framework Element
- General Plan
- Community Plans
- Redevelopment Plans
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) Senate Bill No. 743

Senate Bill (SB) 743, codified within the Public Resources Code (PRC) Section 21099 et. seq., states that “Aesthetic (...) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” (PRC Section 21099(d) (1)). If a project meets these conditions, aesthetic impacts associated with the project would not be

considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in the California Environmental Quality Act (CEQA) Guidelines Appendix G. However, ZI No. 2452 requires that projects in transit priority areas (TPA) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality.

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

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

- “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- “Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
- “Employment center project” means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75, located within a transit priority area.
- “Major transit stop” is defined by PRC Section 21064.3 to mean a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

Projects that meet the criteria set forth in Public Resources Code, Section 21099(d), are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of significance related to aesthetics. The Project Site does not meet the criteria set forth above, and, as such, the Project's potential aesthetics impacts are evaluated herein.

(b) Assembly Bill 1560

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

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

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

(c) California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, Section 260 et seq. The intent of the system is to establish the State’s responsibility for the protection and enhancement of California’s natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the State’s scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. The only State Scenic Highway within the City of Los Angeles includes portions of the Topanga Canyon State Scenic Highway (State Route 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park. Note that road segments within the City of Los Angeles that are listed as “eligible” for scenic highway designation in the Scenic Highway

System List, such as the Pacific Coast Highway, do not fit the CEQA criteria for State scenic highways.

(d) California Historic Parkways

Streets & Highways Code, Section 280 regulates the designation and maintenance of the system of California Historic Parkways. In order to be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

The only designated Historic Parkway within the City of Los Angeles, the Arroyo Seco Parkway (California State Route 110) runs northeasterly from the four-level interchange with U.S. 101 just outside of downtown Los Angeles (mile post 23.69) to East Glenarm Street in the City of Pasadena (mile post 31.89).

(2) City of Los Angeles

(a) General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan.¹ The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design Chapter (Chapter 5) to guide the design of future development.² Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods

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

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

would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).³

Chapter 5 of the Framework Element, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods.⁴ “Urban form” refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. “Neighborhood design” refers to the physical character of neighborhoods and communities within the City.⁵ The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project’s consistency with the Framework Element is provided in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR.

(b) General Plan Conservation Element

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

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

(c) General Plan Transportation Element (Mobility Plan 2035)

The Mobility Plan 2035 (adopted in 2016) provides an inventory of City-designated scenic highways. Scenic highways depicted in the City have special controls for protection and enhancement of scenic resources. The Mobility Plan 2035 also includes Scenic

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

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

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

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

Highway Guidelines for those designated scenic highways for which there is no adopted scenic corridor plan.

(d) Community Plans

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

The Palms–Mar Vista–Del Rey Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Adopted on November 20, 1985, and updated in 1997, the specific purpose of the Palms–Mar Vista–Del Rey Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Palms–Mar Vista–Del Rey community within the larger framework of the City. In addition, the Community Plan serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible. The Palms–Mar Vista–Del Rey Community Plan is one of the four Westside community plans being updated by the City of Los Angeles Department of City Planning.

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

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

(e) Redevelopment Plans

State law ABx1-26 dissolved all California redevelopment agencies, effective October 2011. The legislation prevents redevelopment agencies from engaging in new activities. However, ABx1-26 does not abolish the existing Redevelopment Plan. The land

use regulations in the Redevelopment Plan remain in effect and continue to be administered by the CRA/LA.⁷

(f) Los Angeles Municipal Code

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

(i) Lighting Regulations

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

- Chapter I, 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 I, Article 4.4, Sec. 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially-zoned property.
- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.
 1. Any exterior glazed windows or sliding glass door on any other property containing a residential unit or units.
 2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units.

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

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3. Any ground surface intended for use but not limited to recreation, barbecue or lawn areas on any other property containing a residential unit or units.⁸

(g) Citywide Design Guidelines

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

- Pedestrian-First Design
 - Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
 - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
 - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.
- 360 Degree Design
 - Guideline 4: Organize and shape projects to recognize and respect surrounding context.
 - Guideline 5: Express a clear and coherent architectural idea.
 - Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
 - Guideline 7: Carefully arrange design elements and uses to protect site users.
- Climate-Adapted Design
 - Guideline 8: Protect the site's natural resources and features.

⁸ *Certain exceptions apply related to frosted light sources emitting 800 lumens or less, other sources emitting 800 lumens or more not visible to persons on other residential properties, tennis or paddle tennis courts conforming to certain standards, certain temporary decorative lights, emergency lights, agency controlled light sources, and light sources a minimum distance of 2,000 feet from residential uses.*

- Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.
- Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

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

b. Existing Conditions

(1) Scenic Vistas

According to the City's L.A. CEQA Thresholds Guide, a scenic vista is generally described as a panoramic view (visual access to a large geographic area) of visual resources. As discussed in the L.A. CEQA Thresholds Guide, examples of panoramic views of visual resources might include an urban skyline, valley, mountain range, the ocean, or other water bodies. As described in the Initial Study, included as Appendix A of this Recirculated Draft EIR, visual resources in the vicinity of the Project Site include the Santa Monica Mountains to the north and the Pacific Ocean to the west of the Project Site. However, existing northerly views of the Santa Monica Mountains are limited and such views are primarily available from area roadways where there are gaps between existing buildings, including along Glencoe Avenue located east of the Project Site and Mindanao Way located south of the Project Site. Accordingly, large panoramic views of the Santa Monica Mountains are not available in the vicinity of the Project Site. Existing westerly views of the Pacific Ocean are obstructed by existing development, particularly the Stella Apartments located immediately west of the Project Site.

(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 Recirculated Draft EIR, the Project Site is not located along a scenic highway as designated by the state. The only State Scenic Highway within the City of Los Angeles includes portions of the Topanga Canyon State Scenic Highway (State Route 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park.

(3) Visual Character

(a) Project Site

The Project Site comprises an approximate six-acre portion of the existing Marina Marketplace Shopping Center. The Project Site is currently occupied by three structures, including a two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection; a single-story building providing a variety of retail uses located generally within the southern portion of the Project Site, along Glencoe Avenue; a two-story commercial and retail building located generally within the western portion of the Project Site; and surface parking and circulation areas. The existing buildings range in height from approximately 14 feet to 38 feet. Landscaping within the Project Site includes ornamental landscaping and hardscape features. Street trees and trees within the Project Site consist of various non-native species, including palm, pine, fig, gum, fern, cajeput, carrotwood, octopus, strawberry, and olive trees that are not subject to the City's Protected Tree Regulations.

Overall, as shown in the photographs of the Project Site from the adjacent public rights-of-way provided in Figure IV.A-1 through Figure IV.A-4 on pages IV.A-13 through IV.A-16, the visual character of the Project Site from Maxella Avenue is dominated by expanses of paved surface parking areas with intermittent breaks in asphalt-paved surfaces offered by the on-site structures and limited surrounding landscaping. The visual character of the Project Site from Glencoe Avenue is dominated by the existing two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection and the single-story building located generally within the southern portion of the Project Site, along Glencoe Avenue.

(b) Surrounding Area

As shown in the photographs included in Figure IV.A-1 through Figure IV.A-4, the area surrounding the Project Site is characterized by a mix of low- to high-rise buildings containing a variety of land uses. Predominantly mid- to high-rise, high-density commercial, office, and multi-family residential uses line Lincoln Boulevard/Pacific Coast Highway, generally transitioning to lower density multi-family neighborhoods to the east and west of Lincoln Boulevard/Pacific Coast Highway. Land uses surrounding the Project Site include commercial, retail, and residential uses to the north-northeast, along Maxella Avenue within one- to four-story structures; four-story multi-family residential uses to the east, along Glencoe Avenue; additional Marina Marketplace shopping center-related commercial and retail uses and associated parking to the south; the six-story multi-family Stella apartment complex to the west; and the five-story hotel and associated parking located southwest of the Project Site.

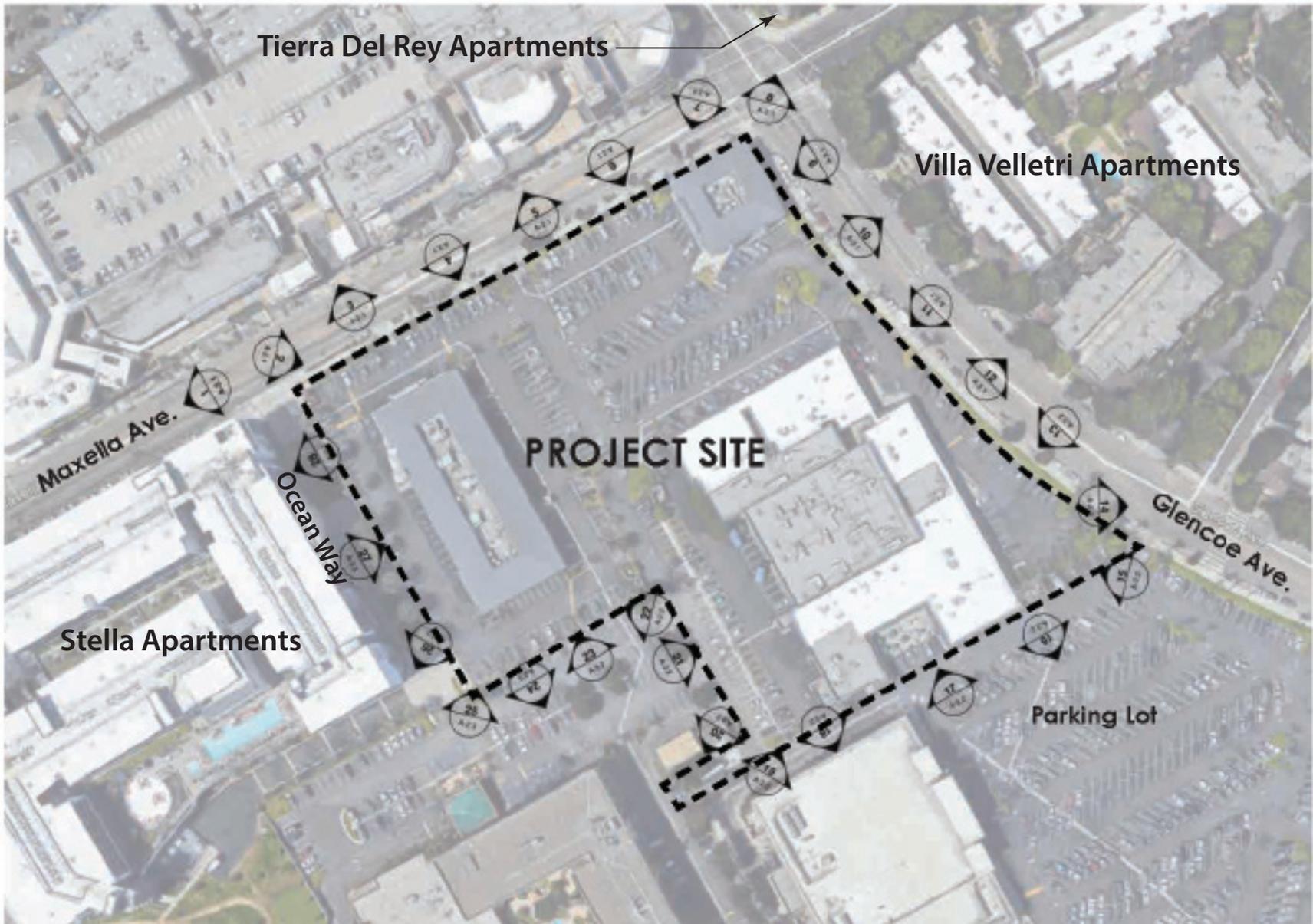


Figure IV.A-1

Key Map of Views of Existing Project Site and Surrounding Uses



Maxella Ave.



2. Maxella Ave.



3. Maxella Ave.



4. Maxella Ave.



Maxella Ave.



6. Maxella Ave.



7. Maxella Ave. & Glencoe Ave.



8. Maxella Ave. & Glencoe Ave.



Glencoe Ave.



10. Glencoe Ave.



11. Glencoe Ave.



12. Glencoe Ave.

Figure IV.A-2

Views of Existing Project Site and Surrounding Uses



3. Glencoe Ave.



14. Glencoe Ave.



15. Shopping Center



16. Shopping Center



7. Shopping Center



18. Shopping Center



19. Shopping Center



20. Shopping Center



1. Shopping Center



22. Shopping Center



23. Private Road



24. Private Road

Figure IV.A-3

Views of Existing Project Site and Surrounding Uses



5. Private Road



26. Private Road



27. Private Road



28. Private Road

Figure IV.A-4
Views of Existing Project Site and Surrounding Uses

(4) Light and Glare

Given the types of uses in the vicinity of the Project Site, existing nighttime light levels are characterized as medium to high. Artificial nighttime light levels are associated with the surrounding retail, restaurant, and residential uses, which typically utilize moderate levels of exterior lighting for security, signage, parking, architectural building highlighting, and landscaping. Other exterior lighting sources include pole-mounted street lights as well as vehicle headlights along adjacent streets (i.e., Maxella Avenue and Glencoe Avenue). Interior lighting from windows of the surrounding commercial and residential uses also contribute to the ambient artificial light levels. Existing light sources on the Project Site include light poles in the surface parking areas, signage lighting for the existing buildings, and exterior building lighting.

Daytime glare is generally associated with reflected sunlight from buildings with highly reflective surfaces such as glass, shiny surfaces, and metal. The existing buildings on the Project Site presently do not generate substantial glare since most of the building façades have stucco or painted finishes and low reflectivity windows. The Project Site also includes surface parking lots with minimal sources of glare, such as daytime glare emanating from sunlight reflecting off parked vehicles within the Project Site. However, these glare sources are not considerable in the context of the urban environment.

As indicated in Figure IV.A-1 on page IV.A-13, the nearest off-site receptors that are considered sensitive relative to light and glare include the Stella Apartments west of the Project Site across Ocean Way; the Tierra Del Rey Apartments northeast of the Project Site across the Maxella Avenue and Glencoe Avenue intersection; and the Villa Velletri Apartments east of the Project Site across Glencoe Avenue. Motorists traveling along roadways in the vicinity of the Project Site may also be sensitive to daytime glare.

3. Project Impacts

a. Thresholds of Significance

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

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

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

Threshold (c): *If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality;*⁹

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

As previously discussed, the Initial Study, included as Appendix A of this Recirculated Draft EIR, determined that the Project would result in a less than significant impact related to the Project's potential to have a substantial adverse effect on a scenic vista (Threshold (a)) and the Project's potential to damage scenic resources within a scenic highway (Threshold (b)). Therefore, these topics are not further evaluated herein. Refer to the Initial Study included as Appendix A of this Recirculated Draft EIR for further discussion of these topics.

For the remaining thresholds (Threshold (c) and Threshold (d)), the analysis utilizes factors and considerations identified in the City's L.A. CEQA Thresholds Guide, as appropriate, to assist in answering these Appendix G Threshold questions. For purposes of this analysis, the criteria from the L.A. CEQA Thresholds Guide that are relevant to the thresholds analyzed herein are as follows:

(1) Regulations Regarding Scenic Quality (Visual Character)

- 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;
- Applicable guidelines and regulations.

(2) Light and Glare

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

⁹ As previously discussed, the State CEQA Guidelines were updated in 2018. As part of that update, Aesthetics Threshold (c) was modified to differentiate between urbanized and non-urbanized areas. As the Project Site is in an urbanized area, this analysis addresses visual character by analyzing whether the Project would conflict with applicable zoning and other regulations governing scenic quality. For non-urbanized area, the analysis would analyze whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

b. Methodology

(1) Regulations Governing Scenic Quality

As previously discussed, the Project Site is located within an urbanized area. As such, in accordance with the updated threshold set forth in Appendix G of State CEQA Guidelines, the analysis addresses visual character by determining whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Accordingly, the analysis is based on Step 3 as outlined in the LA CEQA Thresholds Guide. Step 3 involves comparing the anticipated appearance of the Project to standards within existing plans and policies that are applicable to the Project and the Project Site, including any zone changes or variances. These plans and policies include the City of Los Angeles General Plan Framework Element and Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, the LAMC, and Title 24 of the California Code of Regulations. CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered consistent with the provisions and general policies of an applicable City or regional plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.¹⁰

(2) Light and Glare

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient conditions on the Project Site and vicinity. The analysis describes the Project's proposed light and glare sources and evaluates the extent to which Project lighting may spill off the Project Site onto off-site light-sensitive uses. The analysis considers the affected street frontages, the direction in which the light would be focused, and the extent to which the Project would illuminate sensitive land uses. The analysis also considers the potential for reflected sunlight from building surfaces (glare) and the extent to which such glare would interfere with the operation of a motor vehicle or other activities.

c. Project Design Features

The following project design features are proposed with regard to aesthetics.

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

¹⁰ *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

- AES-PDF-2:** The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.
- AES-PDF-3:** Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from the above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.
- AES-PDF-4:** New on-site utilities that may be required to serve the Project shall be installed underground.
- AES-PDF-5:** Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances, shall be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.
- AES-PDF-6:** All new outdoor lighting required for the Project shall be shielded and directed towards the interior of the Project Site such that the light source does not project directly upon any adjacent property.
- AES-PDF-7:** Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

d. Project Characteristics

The following discussion summarizes the design elements of the Project (Option A and Option B) that are considered in the assessment of operational impacts related to aesthetics.

(1) Project Design and Building Heights

Under Option A, the proposed multi-family residential and neighborhood-serving commercial uses would be provided within three buildings (herein referred to as Building 1, Building 2, and Building 3) that would be organized around an outdoor pedestrian paseo that would be oriented both east–west across the Project Site and north–south through the center of the Project Site and connect to a public plaza along the northwestern portion of the Project Site and a publicly accessible, privately maintained open space area along the

southwestern portion of the Project Site. Each of these buildings would comprise seven stories and would reach an approximate height of 77 feet above grade level. Above the second story of Building 1, Building 2, and Building 3 would be a podium level, which would include amenities such as pools, a spa, and outdoor kitchens with lounges and seating. Along Glencoe Avenue, Building 2 and Building 3 would feature building step backs to reduce building bulk and to form landscaped terraces on the seventh floor that would, in conjunction with the amenity deck at the podium level, serve to reduce the apparent height and bulk of these buildings when viewed from Glencoe Avenue.

Under Option B, the proposed residential, commercial, and office uses would be provided within four buildings (herein referred to as Building 1, Building 2, Building 3, and Building 4) that would be anchored by publicly accessible open space that would extend along the eastern portion of the Project Site from Maxella Avenue to the southern boundary of the Project Site. The Project Site would also be bisected by an east-west paseo that would connect to other paved plazas and courtyards. Building 1 would be a seven-story residential structure located along the southwestern portion of the Project Site, adjacent to an access driveway and the Stella apartments. Building 2 would be a four-story (three stories of office space above one level of ground floor commercial space), mixed-use structure located in the northern portion of the Project Site along Maxella Avenue. Building 3 would be located within the southeastern portion of the Project Site, along Glencoe Avenue, and would be a six-story, mixed-use structure. Building 4 would be a six-story mixed-use structure located within the northeastern portion of the Project Site along Glencoe Avenue and Maxella Avenue. Building 1 would reach a maximum height of up to 79 feet above grade, Building 3 and Building 4 would reach a maximum height of up to 69 feet above grade level while the four-story Building 2 (three stories of office space above one level of ground floor commercial space) would reach a height of up to 69 feet. Level 2 of Building 1, Building 3, and Building 4 would include residential courtyards with amenities such as pools, a spa, and outdoor kitchens with lounges and seating. Along Glencoe Avenue, Building 3 would feature building step backs that would, in conjunction with the amenity deck at the second level, serve to reduce the perceived mass of the buildings when viewed from Glencoe Avenue.

Under both Option A and Option B, the proposed buildings would be designed in a contemporary architectural style. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, louvers, simulated wood accents and exterior plaster, glass and metal railings, and integrated signage and lighting.

(2) Setbacks and FAR

Under Option A, Building 1 would be set back approximately 43 feet from the property line along Maxella Avenue and approximately 15 feet from the property line on the west. Building 2 would be set back approximately 11 feet from the property line along Maxella Avenue. Building 2 and Building 3 would be set back approximately 10 to 15 feet from the property line along Glencoe Avenue. Building 3 would also be set back approximately 20 feet from the primary shopping center access driveway located south of the Project Site ingress and egress to Glencoe Avenue.

Under Option B, Building 1 would be set back approximately 10-17 feet from the property line on the west. Building 1 does not front Maxella Avenue. Building 2 would be set back approximately 13 feet from the property line along Maxella Avenue. Building 3 would be set back approximately 38 feet to 129 feet from the property line along Glencoe Avenue. Building 3 would also be set back approximately 32 feet from the primary shopping center access driveway providing ingress and egress to Glencoe Avenue located south of the Project Site.

Regarding floor area ratio, under Option A, the Project would include approximately 573,548 square feet of net new floor area, corresponding with a total floor area ratio (FAR) of approximately 2.6:1. Under Option B, the Project would include approximately 458,213 square feet of new floor area, corresponding with a total FAR of 2.15:1. The Project Site is zoned by the Los Angeles Municipal Code as [Q]M1-1 (Qualified Limited Industrial, Height District 1). Height District 1 within the M1 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, adopted in 1992, the Q conditions for the Project Site restrict building heights to 45 feet and the FAR for uses not permitted in the MR1 Zone to 0.5 to 1.

(3) Landscaping and Open Space

The Project would provide a variety of open space and recreational amenities. Under Option A, private open space and recreational amenities available to residents and guests of residents would include balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. To enhance the streetscape, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue. This public plaza would connect to a landscaped pedestrian paseo that would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. This open space area would include a one-story amenity building and additional. Trees and other landscaping features would be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In total, in accordance with the requirements of the LAMC,

the Project would provide approximately 70,175 square feet of open space and recreational amenities.

Under Option B, private open space and recreational amenities available to residents and guests of residents would include balconies, courtyard areas at the second level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Option B would also include a large landscaped public park that would extend along Glencoe Avenue from Maxella Avenue to the southern project boundary. This park would include landscaped and paved open space areas with seating and gathering spaces. Trees and other landscaping features would be planted throughout the Project Site, including within the open space area and along Maxella Avenue and Glencoe Avenue. In total, Option B would provide approximately 109,745 square feet of open space and recreational amenities, exceeding the requirements of the LAMC.

(4) Lighting and Signage

As described in Section II, Project Description, of this Recirculated Draft EIR, the lighting and signage incorporated under Option A and Option B would be similar. Development of both options would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting, including lighting fixtures on the pool deck, would be automatically controlled via photo sensors to illuminate only when required and, pursuant to Project Design Feature AES-PDF-6, above, would be shielded or directed toward the interior of the Project Site to limit spill-over onto adjacent properties. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage under Option A and Option B would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the LAMC. Proposed signage would include identity signage, either blade or monument, on the three major Project Site corners (northwest, northeast, and

southeast), building and tenant signage, and general ground level and way-finding pedestrian signage. No off premises or billboard advertising is proposed as part of the Project. The Project would also not include signage with flashing, mechanical, or strobe lights. In general, new signage under Option A and Option B would be architecturally integrated into the design of the proposed buildings and would establish appropriate identification for the residential, commercial, and office (Option B) uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

e. Analysis of Project Impacts

As discussed in Section II, Project Description, of this Recirculated Draft EIR, a previously prepared Draft EIR for the Project was circulated for public review in March 2019. In response to public input, the Project previously evaluated in the Draft EIR has been modified to include a second development option, referred to as Option B. As such, the following analysis of potential Project impacts addresses the Project previously evaluated in the Draft EIR (now referred to as Option A) as well as the additional development option (referred to as Option B).

Under Option A, the Project would include 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including up to approximately 13,650 square feet of retail space and up to approximately 13,650 square feet of restaurant space. Under Option B, the Project would include 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. The total floor area, building heights, massing, and footprints would differ between the two development options. The general design and layout of the Project Site, including setbacks and open space, would also differ between the two options. Both development scenarios are evaluated in the following analysis. Where these differences could alter potential aesthetic impacts associated with each option, the options are considered separately. When the option does not affect the analysis, the term "Project" is used to refer to both options.

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

As evaluated in the Initial Study prepared for the Project included in Appendix A of this Recirculated Draft EIR and as summarized in Section VI, Other CEQA Considerations, of this Recirculated Draft EIR, the Project would be developed west of Glencoe Avenue

and within the boundaries of the existing Marina Marketplace shopping center. As such, existing views of the Santa Monica Mountains looking north from Glencoe Avenue would not be obstructed by the Project. Furthermore, while the Project is expected to obstruct a portion of the very limited views of the Santa Monica Mountains available from Mindanao Way looking north across the Project Site, such views are already mostly obstructed by existing development within the Marina Marketplace shopping center and do not represent a scenic vista wherein large expanses of the Santa Monica Mountains are visible. The most prominent views of the Santa Monica Mountains available in the vicinity of the Project Site from Glencoe Avenue would remain with the Project. In addition, as previously discussed, views of the Pacific Ocean across the Project Site to the west are completely obstructed by existing development west of the Project Site, including the Stella Apartments and high-rise towers along Lincoln Boulevard. Therefore, as concluded in the Initial Study, the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

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

As evaluated in the Initial Study prepared for the Project, which is included as Appendix A of this Recirculated Draft EIR, and as summarized in Section VI, Other CEQA Considerations, of this Recirculated Draft EIR, there are no scenic resources within the Project Site, and the Project Site is not located along a City or state-designated scenic highway. Therefore, as determined in the Initial Study, the Project would not substantially damage scenic resources within a scenic highway, and impacts would be less than significant.

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

(1) Impact Analysis

As previously discussed, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element and the Conservation Element, the Palms–Mar Vista–Del Rey Community Plan, the Citywide Urban Design Guidelines, the LAMC, and Title 24 of the California Code of Regulations. The Project’s consistency with the general intent of these plans and regulations is provided below.

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes several policies and objectives that address the design of future development. As provided in Table IV.A-1 on page IV.A-27, the General Plan Framework includes objectives regarding the scale and character of residential neighborhoods (Objective 4.3) and the quality of development and the public realm (Objective 5.5). Under Option A and Option B, the Project would replace the three existing commercial buildings and the surface parking area with three new buildings, including residential and retail/restaurant uses under Option A and residential, retail/restaurant, and office uses under Option B. The Project under both options would result in greater density and scale of development on the Project Site when compared with existing conditions, with the scale of development under Option A being slightly greater than under Option B. However, both options would be designed to create a visually unified site with the three new buildings designed to complement the surrounding uses and to respond to the low- to mid-scale character of the surrounding area, including the multi-family residential and commercial uses adjacent to the Project Site.

The proposed buildings would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and complement the existing scale in the vicinity of the Project Site. Building scale and massing would be defined by varying massing and height components that would break up the façade into distinct and offset planes. In addition, the Project under Option A would incorporate step backs along Glencoe Avenue to form landscaped terraces on the fourth, sixth, and seventh floors that would, in conjunction with the amenity deck at the podium level, serve to reduce the perceived mass of these buildings when viewed from Glencoe Avenue and the multi-family residential uses to the east of the Project Site. Option B would include a large, publicly accessible open space along Glencoe Avenue, which would also provide a transition to the lower scale multi-family residential uses to the east of the Project Site. Additional landscaping within the Project Site and along the Project's frontage proposed under both options, as well as the open space areas, would further contribute to a visually appealing development, thereby improving the quality of the public realm. Furthermore, under Option A and Option B, surface parking would be removed and replaced by subterranean and at-grade parking levels that would be located internal to the Project Site and screened from view along surrounding streets. This would be a continuation of the existing visual character that characterizes adjacent developments, wherein parking is provided internal to properties, thereby activating street frontages.

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

Goal/Objective/Policy	Would the Project Conflict?
General Plan Framework Element Land Use Chapter (Chapter 3)	
<p>Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.</p>	<p>No Conflict. As described in Section II, Project Description, of this Recirculated Draft EIR, under Option A and Option B, the three existing commercial buildings within the Project Site would be removed and replaced with a mixed-use development that would include new multi-family housing units for the City's population. As provided below and in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter as well as the more updated Citywide Design Guidelines. Therefore, the Project under Option A and Option B would not conflict with this policy.</p>
General Plan Framework Element Housing Chapter (Chapter 4)	
<p>Objective 4.3: Conserve scale and character of residential neighborhoods.</p>	<p>No Conflict. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid- to high-rise buildings containing a variety of land uses including commercial, office, and residential uses. The residential uses located within the immediate vicinity of the Project Site include the six-story Stella apartments located adjacent to the Project Site on the west and one- to three-story multi-family residential uses across Glencoe Avenue to the east. The Project would include a similar mix of uses to those in the vicinity of the Project Site, with compatible scale and character. Option A would consist of multi-family residential and commercial uses within three buildings with a height of approximately 77 feet. Option B would consist of multi-family residential, commercial, and office uses within four buildings with heights ranging from 69 feet to a maximum height of 79 feet (Building 1). Under Option A and Option B, the Project would incorporate design elements that would be similar to and compatible with the mix of uses that surround the Project Site, including the residential uses. Option A and Option B would feature a contemporary architectural style with new buildings designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area, including the residential uses. The proposed buildings under both options would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and would generally maintain the existing scale in the vicinity of the Project Site. While the scale of development under Option A would be slightly increased as compared to Option B, both options would incorporate varying massing and height components that would break up the buildings' façades into distinct and offset planes. Specifically,</p>

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

Goal/Objective/Policy	Would the Project Conflict?
	<p>Option A would incorporate building step backs along Glencoe Avenue to form landscaped terraces on the fourth, sixth, and seventh floors that would, in conjunction with the amenity deck at the podium level, serve to reduce the perceived mass of these buildings when viewed from Glencoe Avenue and the multi-family residential uses to the east of the Project Site. Option B would include a large, publicly accessible open space area along Glencoe Avenue, which would also provide a transition to the lower scale multi-family residential uses to the east of the Project Site. In addition, Under Option A and Option B, the existing surface parking would be removed and replaced by subterranean and above grade parking levels that would be located internal to the Project Site and screened from view along surrounding streets. This would be a continuation of the existing visual character that characterizes adjacent developments.</p>
<p>General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)</p>	
<p>Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.</p> <p>Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.</p>	<p>No Conflict. As described in Section II, Project Description, of this Recirculated Draft EIR, under Option A and Option B, the three existing commercial buildings on the Project Site would be removed and replaced with a mix of uses. Option A would include 658 multi-family residential units and up to 27,300 square feet of commercial uses and Option B would include 425 multi-family residential units, up to 90,000 square feet of office uses, and up to 40,000 square feet of commercial uses. Option A and Option B would both provide new housing units for the City's population as well as neighborhood-serving commercial uses and job opportunities. Both options would feature a contemporary architectural style and would be designed to create a visually unified site with a new building designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. In addition, both options would include landscaping and open space areas, as well as pedestrian amenities, that would further improve the quality of the public realm. Both options would replace the existing surface parking area on the Project Site with two subterranean parking levels and one (Option B) or two (Option A) above-grade parking levels that would be located internal to the Project Site and screened from view from surrounding roadways, which would also improve the quality of the public realm.</p>
<p>Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.</p>	<p>No Conflict. Proposed signage under Option A and Option B would be designed to be aesthetically compatible with the architecture of the Project and the surrounding area. Proposed signage would include mounted identity signage and general wayfinding</p>

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

Goal/Objective/Policy	Would the Project Conflict?
	signage, which would be integrated with the proposed building and comply with the requirements of the LAMC.
General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)	
<p>Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.</p>	<p>No Conflict. Under Option A and Option B, the Project would provide appropriate lighting for nighttime vision, visibility, and safety needs throughout the Project Site, including outdoor locations, pedestrian pathways, and the subterranean parking levels proposed under both options. Night lighting would be low profile and at the necessary intensity to provide a safe environment. Sufficient lighting would be provided in the parking levels to maximize visibility and reduce areas of concealment. Any terrace lighting would be directed downward towards walkable surfaces and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties. Pursuant to Project Design Feature AES-PDF-6, the Project would protect and preserve the nighttime environment and driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare by shielding and directing outdoor security lighting onto building surfaces and toward the interior of the Project Site to prevent light spillover onto sensitive resources. The Project design would also minimize glare by using low-reflective glass, or glass treated with anti-reflective coating in the building facades. In addition, the Project's extensive landscaping along the perimeter of the Project Site would be utilized for screening to minimize views of the Project Site and any associated glare.</p>
<p>Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.</p>	<p>No Conflict. Proposed lighting under Option A and Option B would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, Option A and Option B, would minimize light pollution, light trespass, and glare, as outlined in Project Design Feature AES-PDF-6.</p>
<p>Policy 9.40.1: Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.</p>	<p>No Conflict. Refer to the discussion for Goal 9P above.</p>
<p>Policy 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.</p>	<p>No Conflict. Refer to the discussion for Goal 9P above. In addition, under Option A and Option B, the Project would provide sufficient lighting within the parking</p>

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

Goal/Objective/Policy	Would the Project Conflict?
	facilities to maximize visibility and reduce areas of concealment. In addition, parking under both options would primarily be provided in subterranean and at-grade parking levels that would be located internal to the Project Site and screened from view along surrounding streets, thereby eliminating light spillover from parking uses. There would be sufficient lighting along walkways and other open space areas to facilitate pedestrian orientation and clearly identify a secure route between the subterranean and above-grade parking levels and entry into the buildings.
Policy 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	No Conflict. While this policy is a citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.
General Plan Conservation Element	
Section 5—Cultural and Historical	
Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	No Conflict. As analyzed in the Initial Study prepared for the Project and included as Appendix A of this Recirculated Draft EIR, none of the existing structures on the Project Site are considered historic resources. Thus, the Project (Option A and Option B) would not impact important cultural and historical sites or resources.
Section 15—Land Form and Scenic Vistas	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	No Conflict. The Project Site is located in an area that is highly urbanized with built out surroundings. Therefore, publicly available scenic vistas of valued visual resources in the vicinity of the Project Site, including the Santa Monica Mountains and the Pacific Ocean, are unavailable or limited to roadways where there are gaps between existing buildings. As such, the Project would not obstruct or remove access to natural and scenic vistas.
<p><i>Project consistency with additional General Plan Framework Element goals, objectives, and policies is analyzed in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR.</i></p> <p><i>Source: Eyestone Environmental, 2023.</i></p>	

The proposed landscaping both within the Project Site and along the Project's frontage, would further contribute to a visually appealing mixed-use development, and would improve the quality of the public realm by promoting pedestrian activity and further activating the streets in the vicinity of the Project Site. In addition to the landscaping, both options would include open space and a series of public plazas, courtyards, and paseos.

Specifically, Option A would include a public plaza along the northwestern portion of the Project Site and a publicly accessible open space area along the southwestern portion of the Project Site, which would be connected by a pedestrian paseo that would run through the Project Site. Option B would include a large publicly accessible open space area along Glencoe Avenue and additional paseos, courtyards, and plazas throughout the Project Site.

As further discussed in Table IV.A-1 on page IV.A-27, the Project would also support the City's policy to encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character (Policy 5.8.4). Specifically, proposed signage for Option A and Option B would be designed to be aesthetically compatible with the architecture proposed for the building as well as the surrounding area. The Project would also support the goal related to lighting standards (Goal 9P) and the supporting objective and policies, as outlined in Table IV.A-1.

Overall, the Project (Option A and Option B) would not conflict with the applicable objectives and policies that support the goals set forth in the General Plan Framework Element regarding scenic quality.

(ii) Conservation Element

As previously discussed, Section 5 of the Conservation Element addresses the protection of important cultural and historical sites and resources and Section 15 of the Conservation Element addresses the protection of natural and scenic vistas. As outlined in Table IV.A-1, no cultural or historical resources are located on the Project Site. In addition, the Project is located within a highly urbanized area and, as such, public views of scenic resources in the vicinity of the Project Site are unavailable or limited to roadways where there are gaps between existing buildings. Therefore, Option A and Option B would not demolish or modify important cultural or historical sites or impact obstruct or remove access to natural and scenic vistas in the area. Therefore, the Project would not conflict with objectives and policies in the Conservation Element regarding the protection of cultural and historical sites and the obstruction of existing scenic vistas or public views of visual resources.

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

As provided in Table IV.A-2 on page IV.A-32, the Project would not conflict with the applicable objectives and policies that support the goals of the Palms–Mar Vista–Del Rey Community Plan related to scenic quality. Specifically, the Project would not conflict with Policy 1-3.1 requiring architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing residential neighborhoods. Similarly, with regard to commercial development, the Project would be compatible with adjacent development, community character, and scale

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

Goal/Objective/Policy	Analysis of Project Consistency
Residential	
<p>Policy 1-3.1: Require architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.</p>	<p>No Conflict. The vicinity of the Project Site is developed with a mix of commercial and residential uses including a six-story apartment building located adjacent to the Project Site on the east (Stella apartments) and a two-to-three story multi-family residential development located across Glencoe Avenue to the east. Under Option A and Option B, the Project would feature a contemporary architectural style that would be designed to create a visually unified site with buildings that would complement the mix of existing surrounding uses, including these residential uses, and respond to the low- to mid-scale character of the surrounding area. Under both options, the proposed buildings would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In particular, the building's scale would be defined by varying massing and height components that would break up the façade into distinct and offset planes. In addition, Option A would incorporate stepbacks along Glencoe Avenue and Option B would include a large, publicly accessible open space area along Glencoe Avenue, both of which would provide a transition to the lower scale multi-family residential uses to the east of the Project site. Landscaping would be provided along Glencoe Avenue and Maxella Avenue, and landscaping and open space areas, including paseos and courtyards, would be incorporated throughout the Project Site under both options. The architectural and landscaping elements included in Option A and Option B would protect and enhance the character and scale of the surrounding neighborhood.</p>
Commercial	
<p>Policy 2-3.1: Require that the design of new development be compatible with adjacent development, community character and scale.</p>	<p>No Conflict. The Project Site is bounded by Maxella Avenue to the north, Glencoe Avenue to the east, the existing Pavilions grocery store and associated parking within the Marina Marketplace shopping center to the south, and the Stella apartments to the west. Against this backdrop, the Project under Option A and Option B would replace the current low-rise commercial buildings with a mix of uses located within three buildings. Under Option A, each of the buildings would be 77 feet in height, and under Option B, three of the buildings would be up to 69 feet in height while Building 1 would reach a maximum height of up to 79 feet. Under both options, the new development would be compatible with the adjacent development both in terms of uses and proposed design that would complement the existing surrounding uses and respond to the low- to mid-scale character of the</p>

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

Goal/Objective/Policy	Analysis of Project Consistency
	surrounding area, as previously discussed above in Policy 1-3.1.
<p>Policy 2-3.2: Establish commercial areas and street identity and character through appropriate sign control, landscaping and streetscape</p>	<p>No Conflict. The Project would enhance the existing streetscape through building design and proposed streetscape amenities. Under Option A, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo that would extend south to a publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. New pedestrian access points under Option A would be created throughout the Project Site via the pedestrian paseo and internal street. Under Option B, the Project would include a large landscaped publicly accessible open space area along Glencoe Avenue. Pedestrian access would continue to be provided from Maxella Avenue and Glencoe Avenue. Under Option A and Option B, trees and other landscaping and pedestrian features would be provided along Maxella Avenue and Glencoe Avenue and throughout the Project Site. The proposed street-level commercial uses proposed under both options would also serve to enhance the pedestrian activity on the street.</p>
Chapter V—Urban Design	
Design for Individual Projects	
Multiple Residential	
<p>Building Design: The design of all multi-family residential development of five or more units shall be in conformity with the visual pattern of the community. The design should promote harmony in relationship between new and existing buildings, avoid excessive variety and monotonous repetition and be sensitive to the scale, form, height and proportion of surrounding development. To achieve this goal the following policies are proposed:</p> <ol style="list-style-type: none"> 1. The use of articulation, recess, or perforations of surfaces to break up long, flat building facades with varying rooflines. 2. Utilization of complementary building materials, textures and color in building facades. 3. Incorporating varying design to provide definition to each floor and uniformity of detail, scale and proportions. 4. Integrating building fixtures, awnings, security gates or wall/fence into the design 	<p>No Conflict. The Project under Option A and Option B would include a similar mix of uses with a compatible scale and character to those in the vicinity of the Project Site, including the adjacent Stella apartments and the commercial uses across Maxella Avenue. Under both options, the Project would be designed in a contemporary architectural style that would create a visually unified site to respond to the low- to mid-scale character of the surrounding area. The proposed buildings would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. More specifically, cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the buildings, including tile or stone veneer, storefront windows, aluminum louvers, wood exterior plaster, glass railings, and integrated signage and lighting.</p>

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

Goal/Objective/Policy	Analysis of Project Consistency
<p>of the building.</p> <ol style="list-style-type: none"> 5. Screening all rooftop equipment and building appurtenances from public view. 6. Requiring decorative masonry walls to enclose trash. 	<p>In addition, landscaping that would serve as screening along the perimeter of the Project Site would be provided at the ground level. Option A would also incorporate building step backs along Glencoe Avenue to form landscaped terraces on the fourth, sixth, and seventh floors that would, in conjunction with the amenity deck at the podium level, serve to reduce the perceived mass of these buildings when viewed from Glencoe Avenue and the multi-family residential uses to the east of the Project Site. Option B would include a large, publicly accessible open space area along Glencoe Avenue, which would also provide a transition to the lower scale multi-family residential uses to the east of the Project Site. In addition, as outlined in Project Design Feature AES-PDF-5, mechanical, electrical, and rooftop equipment and building appurtenances would be integrated into the design of the Project and screened from view from public rights-of-way.</p>
<p>Landscaping: Open space and proper landscaping are an asset and an essential component of development design. A landscape plan should include the following elements;</p> <ol style="list-style-type: none"> 1. Provide attractive views and visual relief from the building mass. 2. Enhance and complement the building. 3. Buffer other land uses. 4. Include appropriate planting material including trees, shrubbery and flowering plants. 5. Provide useable open space for outdoor activities, especially for children. 	<p>No Conflict. Both options would include expanded open space and landscaping, which would be defined in a landscape plan. Under Option A, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo that would extend south to a proposed publicly accessible, privately maintained open space area near the southwest corner of the Project Site. Option A would also include balconies, paved plazas with seating, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. In total, Option A would provide 70,175 square feet of open space. Option B would include balconies, courtyard areas at the second level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Option B would also include a large, landscaped, publicly accessible open space area along Glencoe Avenue. In total, Option B would provide 109,745 square feet of open space. Also refer to the discussion for Policy 1-3.1 above.</p>
<p>Commercial</p>	
<p><u>Height and Building Design for All Commercial Areas</u></p> <ol style="list-style-type: none"> 1. Providing accenting, complementary building materials to building façades. 2. Designating architecturally untreated façades for signage. 3. The use of articulations, recesses, surface perforations and other architectural features to break up long, flat building façades. 	<p>No Conflict. As previously described, the Project design under both options would incorporate various elements that would provide architectural relief and add visual interest. Option A and Option B would incorporate building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In addition, mechanical and electrical equipment would be integrated into the Project’s architectural design and</p>

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

Goal/Objective/Policy	Analysis of Project Consistency
4. Screening of mechanical and electrical equipment from public view. 5. Requiring the enclosure of trash areas for all projects.	screened from public view, and trash and recycling areas would be enclosed.
<u>Parking Structures</u> Parking structures shall be integrated with the design of the buildings they serve through: <ol style="list-style-type: none"> 1. Designing parking structure exteriors to match the style, materials and colors of the main building. 2. Maximizing commercial uses on the ground floor. 3. Landscaping to screen parking structures not architecturally integrated with the main building 4. Utilizing decorative walls and landscaping to buffer residential uses from parking structures. 	No Conflict. Under Option A and Option B, the entrance to the subterranean parking levels would be designed to match the style, materials, and color of the main building, thereby minimizing the appearance of driveways and parking areas. Landscaping within the Project Site, including along Maxella Avenue and Glencoe Avenue, would further serve to integrate vehicular access and exit points into the design of the Project. In addition, Option A, would include up to 27,300 square feet of neighborhood-serving commercial use and Option B would include up to 40,000 square feet of neighborhood-serving commercial uses, which would be located on the ground floor of two of the three residential buildings and the proposed office building.
<u>Light and Glare</u> <ol style="list-style-type: none"> 1. Installing on-site lighting along all pedestrian walkways and vehicular access ways. 2. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses. 	No Conflict. Under both options, the Project would include low-level exterior lights adjacent to the proposed building and along pedestrian walkways for security and wayfinding purposes. In addition, appropriate lighting would be provided at vehicular access points. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties. In addition, pursuant to Project Design Feature AES-PDF-6, all new outdoor lighting would be shielded and directed towards the interior of the Project Site such that the light source does not project directly upon any adjacent property.
<hr/> <p><i>Project consistency with additional Community Plan goals, objectives, and policies is analyzed in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR.</i></p> <p><i>Source: Eyestone Environmental, 2023.</i></p>	

(Policy 2-3.1) and the Project would enhance the existing pedestrian street activity (Policy 2-3.2). Also, as discussed in Table IV.A-2 on page IV.A-32, the Project would not conflict with the design guidelines set forth in the Urban Design Chapter of the Community

Plan, including those related to building design and landscaping guidelines for multi-family residential uses and those related to height, building design, parking structures, and light and glare for commercial uses.

As previously discussed, the proposed uses under both options would be provided within three buildings that would feature compatible massing, heights, and design elements consistent with the other mid-rise multi-family residential and commercial uses found in the vicinity of the Project Site, such as the existing adjacent six-story Stella apartments to the west and the two-story commercial uses across Maxella Avenue to the north, that feature a more contemporary design. The proposed buildings under both options would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. Option A would incorporate step backs along Glencoe Avenue to form landscaped terraces that would reduce the perceived mass of these buildings when viewed from Glencoe Avenue and the multi-family residential uses to the east of the Project Site. Option B would include a large, publicly accessible open space area along Glencoe Avenue, which would also provide a transition to the lower scale multi-family residential uses to the east of the Project Site.

Landscaping and open space areas would further contribute to the character and scale of the Project Site vicinity. Option A would include balconies, paved plazas with seating, landscaped paseos, courtyard areas at the podium level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. In addition, a landscaped public plaza would be provided at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo that would extend south to a publicly accessible, privately maintained open space area near the southwest corner of the Project Site. Option B would include balconies, courtyard areas at the second level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Option B would also include a large landscaped open space area along Glencoe Avenue that would incorporate landscaped and paved open space areas with seating and gathering spaces. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue under both options.

(c) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the ten Citywide Design Guidelines should be considered in a project, not all of the guidelines and supporting best practices will be appropriate in every case. The guidelines that are applicable to a discussion of aesthetics (Guidelines 1 through 5) are outlined below. As discussed, the Project would not conflict with the applicable guidelines of the Citywide Design Guidelines.

Refer to Section IV.H, Land Use and Planning, of this Recirculated Draft EIR for a discussion of all of the Citywide Design Guidelines.

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

Under Option A, the proposed uses would be located within three buildings that would be constructed around a pedestrian paseo, which would provide pedestrian connections within and around the Project Site. From the pedestrian paseo and the public plaza proposed along the northwestern portion of the Project Site, pedestrians would be able to access Marina Marketplace shopping center-related uses across Maxella Avenue via the existing signalized pedestrian crosswalk along Maxella Avenue. At the southern terminus of the pedestrian paseo, pedestrians would be able to access Marina Marketplace shopping center-related uses south of the Project Site. Under Option B, the proposed uses would be located within four buildings with pedestrian access provided from Maxella Avenue and Glencoe Avenue through the large park along Glencoe Avenue. Pedestrian pathways would also be provided throughout the Project Site.

Under both options, the proposed neighborhood-serving commercial uses would be located at the ground level, and landscaping and pedestrian amenities would be provided throughout the Project Site, which would further enhance the pedestrian experience. In addition, appropriate lighting would be incorporated in the design of the Project under both options and would provide efficient and effective on-site pedestrian lighting. Thus, the Project would not conflict with Citywide Design Guideline 1.

Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.

Under Option A, the Project would provide 1,217 vehicle parking spaces within two subterranean parking levels and two above-grade parking levels in each of the three buildings. Vehicular access to the Project Site would be provided via five driveways, including two entry/exit driveways located along Ocean Way west of Building 1, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site.

Under Option B, the Project would provide 1,287 vehicle parking spaces within three subterranean parking levels and one at-grade parking level in each of the buildings. Vehicular access to the Project Site would be provided via five driveways, including three entry/exit driveways located along Ocean Way west of Building 1 and two entry/exit driveways located along the southern boundary of the Project Site. In addition, Option B would include a guest drop-off area along Ocean Way.

Under Option A and Option B, the entrance to the subterranean parking levels would be designed to match the style, materials, and color of the main building, thereby minimizing the appearance of driveways and parking areas. In addition, the Project would remove the existing surface parking areas within the Project Site, which includes a total of 418 parking spaces. Landscaping within the Project Site, including along Maxella Avenue and Glencoe Avenue, would further serve to integrate vehicular access and exit points into the design of the Project. Therefore, the Project would not conflict with Citywide Design Guideline 2.

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

The Project would improve the streetscape experience through building design, proposed streetscape amenities, and landscaping and open space improvements. Under Option A and Option B, the buildings would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed building would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. Both options would also include ground-level neighborhood-serving commercial uses, which would further maintain the human scale at street level. In addition, Option A would include a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. Option B would include a large landscaped publicly accessible open space area along Glencoe Avenue that would extend from Maxella Avenue to the southern Project Site boundary. Under Option A and Option B, trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. Along the streetscape, Project signage would be appropriately scaled and aesthetically compatible with the architecture proposed for the Project Site as well as the existing architecture in the surrounding area. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. As such the Project under Option A and Option B would not conflict with Citywide Design Guideline 3.

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

As previously discussed, the Project design under both Option A and Option B would complement the surrounding uses, which primarily consist of commercial and residential uses, including a hotel, a shopping center, and multi-family residential uses. Currently, building heights in the surrounding area range from one story commercial uses to the north-northeast and south of the Project Site, to the six-story multi-family Stella

apartment complex to the west. The Project would replace a two-story Barnes & Noble bookstore, a single-story building occupied by a United States Post Office and a variety of retail uses, and a two-story commercial and retail building. Under Option A, the Project would develop three seven-story mixed-use buildings. Under Option B, the Project would develop one seven-story mixed-use building (Building 1), one four-story office building (three stories of office space above one level of ground floor commercial space) (Building 2), and two six-story buildings (Buildings 3 and 4). Both options would include ground-floor neighborhood serving commercial uses. Under Option A and Option B, the buildings would feature a contemporary architectural style and would be designed to create a visually unified site to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area. The proposed buildings would include building fenestration, a variety of surface materials, and a stepped design to create horizontal and vertical articulation, provide visual interest, and maintain the existing scale in the vicinity of the Project Site. In addition, under Option A, the buildings that would be developed within the eastern portion of the Project Site (Building 2 and Building 3) would feature building step backs to reduce building bulk and to form landscaped terraces on the seventh floor that would, in conjunction with the amenity deck at the podium level, serve to reduce the apparent height and bulk of these buildings when viewed from Glencoe Avenue. Similarly, under Option B, Building 3, which would be located within the eastern portion of the Project Site, would also feature building step backs that would, in conjunction with the amenity deck at the second level and the large park that would be located along Glencoe Avenue, serve to reduce the perceived mass of the buildings when viewed from Glencoe Avenue. In addition, ground-level neighborhood-serving commercial uses would be provided under both options. These elements would ensure that the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The Project under both Option A and Option B would utilize distinguishable design features that would add visual interest while respecting the aesthetic character of the surrounding area. Fundamental to the design concept are the materials that would create the contemporary architectural style that would be designed to visually unify the Project Site and complement the existing surrounding uses. A variety of exterior finishes, materials, and textures would be integrated into the overall design of the various buildings, including tile or stone veneer, storefront windows, louvers, simulated wood accents and exterior plaster, glass and metal railings, and integrated signage and lighting. Cantilevered balcony decks, horizontal overhangs, and canopies would be integrated with vertical fins and other architectural elements, such as balcony and stair railing and shading devices. These architectural elements would provide horizontal and vertical articulation that would serve to break up the building planes and modulate building massing. Both Option A and Option B would include a variety of open space and recreational amenities, as well as trees and other landscaping features, which would further visually unify the Project Site. All of these elements would be designed to complement the overall design of the Project Site,

creating a coherent architectural idea that would be consistent with Citywide Design Guideline 5.

(d) Los Angeles Municipal Code

As discussed in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR, the Project Site is zoned by the LAMC as [Q]M1-1 (Qualified Limited Industrial, Height District 1). The Limited Industrial zone permits a wide array of land uses. Specifically, the M1 Zone permits any commercial land use permitted in the MR1 and C2 zones, in addition to other specified uses including (but not limited to) foundry, rental of equipment commonly used by contractors, stadiums, arenas, auditoriums, and indoor swap meets. Residential uses are generally not permitted. The Project Site is also located in Height District 1 within the M1 Zone, which normally imposes no height limitation and a maximum FAR of 1.5:1. However, pursuant to Ordinance No. 167,962, the Q conditions for the Project Site restrict building heights to 45 feet. The Q Conditions also provide that if any use not permitted in the MR1 Zone is developed on the Project Site, the FAR for such uses shall be limited to 0.5 to 1. In addition, per Ordinance No. 167,962, no portion of a building or structure shall exceed 35 feet in height within 50 feet of the Glencoe Avenue right-of-way. As provided in Section II, Project Description, of this Recirculated Draft EIR, the Project includes a General Plan Amendment pursuant to LAMC Section 11.5.6 to amend the Project Site's land use designation from Limited Manufacturing to General Commercial and a Vesting Zone Change and Height District Change under LACM Section 12.32 to change the zoning from [Q]M1-1 to (T)(Q)C2-2D, which would allow the proposed FAR of 2.6:1 (under Option A) and 2.11:1 (under Option B), height of 77 feet (both options), and residential uses. In addition, pursuant to the existing [Q]M1-1 zoning, the Project is not required by the LAMC to include front, rear, or side yard setbacks. With the approval of the vesting zone change from the M1 Zone to C2 Zone, no front, rear, or side yard setbacks would be required for non-residential uses. However, for residential uses, a five-foot side yard setback minimum not to exceed 16 feet with an additional one foot for each story over two levels, and a 15-foot rear yard setback not to exceed 20 feet with an additional one foot for each story over the third level would be required.

As it related to aesthetics, the proposed Vesting Zone Change and Height District Change and resulting increase in FAR and height limitations would not result in a significant impact. As discussed throughout this analysis, the change in scale would be moderated by a high degree of articulation created by fenestration; variations in building planes, rooflines, heights, and façade setbacks and projections; and a variety of surface materials to reduce the visual effect of the height and massing from public vantage points and provide a pedestrian scale adjacent to the public streets. The proposed mid-rise buildings under both options would be compatible with existing mid-rise buildings in the vicinity of the Project Site, including the six-story multi-family Stella apartment complex to the west, the five-story Hotel MdR located southwest of the Project Site, the four-story

apartment complex located northeast of the Project Site, and the two-story Marina Marketplace with three-story parking structure located north of the Project Site. Similarly, the proposed FAR under Option A and Option B for the Project would be consistent with other developments surrounding the Project Site, including the Stella Apartments directly to the west of the Project Site. On the east side of the Project Site, Option A would incorporate step backs along Glencoe Avenue and Option B would include a large park that would extend along Glencoe Avenue from Maxella Avenue to the southern Project boundary to reduce the apparent height and bulk of buildings when viewed from the lower scale multi-family residential uses along Glencoe Avenue.

With regard to setbacks, as discussed in Section IV.H, Land Use and Planning, of this Recirculated Draft EIR, Option A and Option B, would comply with all of the applicable setback requirements outlined in the LAMC. These setbacks, which would incorporate additional façade step backs and projections, would contribute to the varied visual setting and the pedestrian scale in the Project vicinity.

In summary, with approval of the requested discretionary actions, the Project under Option A and Option B would be generally consistent with the applicable aesthetic-related provisions of the LAMC.

(e) California Code of Regulations, Title 24

Title 24 of the California Code of Regulations includes standards related to lighting that would be applied to the Project under Option A and Option B. In general, Project lighting under Option A and Option B would be designed to provide efficient and effective lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Pursuant to Project Design Feature AES-PDF-6, all new outdoor lighting would be shielded and directed towards the interior of the Project Site such that the light source would not project directly upon any adjacent property. In addition, Option A and Option B would adhere to minimum light intensities along pedestrian pathways, circulation ways, and paths of egress. Furthermore, the Project would comply with lighting control and cutoff requirements, power density allowances, and sign lighting controls. The Project would also adhere to the lighting standards regarding maximum allowable light levels, efficiency requirements, control requirements, and light trespass requirements. In addition, the Project would adhere to all applicable LAMC lighting standards. Thus, the Project would comply with all of the applicable aesthetic-related provisions including in Title 24 of the California Code of Regulations, including the California Building Code (Title 24, Part 1), California Electrical Code (Title 24, Part 3), the California Energy Code (Title 24, Part 6), and the California Green Building Standards Code (Title 24, Part 11).

(f) *Conclusion*

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) *Construction*

Lighting needed during construction of the Project under Option A and Option B would have the potential to generate light spillover to off-site sensitive land uses in the vicinity of the Project Site, including the residential uses to the north-northeast, along Maxella Avenue; multi-family residential uses to the east, along Glencoe Avenue; the Stella apartment complex to the west; and the Hotel MdR located southwest of the Project Site. While the majority of Project construction would occur during daylight hours (during a typical eight-hour workday), construction activities could potentially require the use of artificial lighting if construction were to occur in the evening until 9:00 P.M., as permitted per the LAMC. Additionally, artificial lighting may be required during the winter months when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. In addition, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as identified in Project Design Feature AES-PDF-3, above, construction lighting would be shielded and/or aimed so that no direct beam

illumination would fall outside of the Project Site boundary. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the construction site would not be anticipated to be substantially affected by construction lighting. Therefore, with adherence to existing LAMC regulations and Project Design Feature AES-PDF-3, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, the glare from vehicles that currently park on the Project Site would be similar or cause greater visual impacts than any temporary construction glare that may be generated during construction activities. Additionally, as set forth in Project Design Feature AES-PDF-1, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above analysis, construction activities associated with the Project under Option A and Option B would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts from Project-related sources of artificial light and glare during construction would be less than significant.

(b) Operation

Under Option A and Option B, the Project would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare from vehicles that currently park on the existing surface parking lot. New sources of artificial lighting that would be introduced by the Project would include: low-level interior lighting visible through the windows of the buildings; signage lighting; architectural lighting on the buildings, including lighting associated with podium uses and activities; low-level security and wayfinding lighting; and landscape lighting. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area. As outlined in Project Design Feature PDF-AES-6, all exterior lights would be directed towards the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. The stepped back design of the Project would further ensure that lighting on the upper levels and the podium is concentrated in the central portion of the buildings, and would provide space along the building edges to serve as a buffer for rooftop light spillover. The large, publicly accessible open space area proposed under Option B along Glencoe Avenue would further serve to buffer light spillover on the east side of the Project Site. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

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

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include tile or stone veneer, storefront windows, aluminum louvers, wood or simulated wood, exterior plaster, and glass railings. As provided above in Project Design Feature AES-PDF-7, the Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas would be underground or enclosed, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night compared to existing conditions. While headlights from vehicles entering and exiting the Project's driveways would be visible

from the surrounding uses during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Based on the above, lighting and glare associated with Project operation under Option A and Option B would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Light and glare impacts during operation of the Project would be less than significant.

(2) Mitigation Measures

Project-level impacts related to creating a new source of substantial light or glare would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to creating a new source of substantial light or glare were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level remains less than significant.

f. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Recirculated Draft EIR, there are 14 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, hotel, and institutional developments. As shown in Figure III-1 in Section III, Environmental Setting, of this Recirculated Draft EIR, there are two related projects in proximity to the Project Site. These include Related Project No. 2, a proposed mixed-use residential and office development at 4210 South Del Rey Avenue and Related Project No. 7, the Stella Phase 2 multi-family residential development. These proposed developments comprise a variety of uses consistent with existing uses in the area.

(a) Regulations Governing Scenic Quality

As with the Project, future developments, including the related projects, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards that address aesthetics. Related projects would also be subject to CEQA review. In addition, as the Project would generally not conflict with applicable land use plans and policies that govern scenic quality, the Project would not incrementally contribute to cumulative inconsistencies with respect to such plans and policies. **Therefore, the Project's contribution to cumulative impacts**

related to consistency with regulations governing scenic quality would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Light and Glare

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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