IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

Senate Bill (SB) 743, codified within 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."[1] A transit priority area (TPA) is defined as an area within 0.5 miles of a "major transit stop."[2] 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 CEQA Guidelines Appendix G. As discussed in more detail below, Assembly Bill (AB) 2553, approved in September 2024, modified the definition of a major transit stop set forth in PRC Section 21064.3 to mean a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods, or other major transit stops that are included in the applicable regional transportation plan. With this updated legislation, the Project is exempt from providing an analysis of aesthetics and aesthetics impacts associated with the Project are determined to be less than significant. Nonetheless, the analysis below is provided for informational purposes only.

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. The analysis of light and glare is based on the Radford Studio Center Project Lighting and Glare Technical Report (Lighting Report) prepared for the Project by Francis Krahe & Associates included in Appendix C.1 of this Draft EIR. The analysis of shade and shadow is based on the Shadow Study prepared for the Project by Skidmore, Owings & Merrill included in Appendix C.2 of this Draft EIR.

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[1] *PRC Section 21099(d) (1).*

[2] *PRC Section 21099(a) (7).*

a. Scenic Vistas

The term “scenic vista” generally refers to visual access to, or the visibility of, a particular site 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 of a 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 man-made 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 man-made 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.

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. Certain 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.

Light trespass is the artificial light produced on a property that falls on an adjacent property. Light trespass is measured in terms of illuminance (footcandles [fc] or metric units lumens per square meter [lux]), and can be measured at any point and in any direction. Where light trespass is evaluated, the illuminance is measured perpendicular to the source of light,

toward the source of light, at the property line, or the location where light would cause an issue, such as a residential window or balcony. Light trespass is evaluated at night.

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.

In addition, the following definitions are relevant to the analysis of light and glare provided in this section:

Brightness: The magnitude of sensation that results from viewing surfaces from which light comes to the eye. This sensation is determined partly by the measurable luminance of the source and partly by the conditions of observation (context), such as the state of adaptation of the eye. For example, very bright lamps at night appear dim during the day, because the eye adapts to the higher brightness of daylight

Candela: Measure of light energy from a source at a specific standard angle and distance. Candela (cd) is a convenient measure to evaluate output of light from a lamp or light fixture in terms of both the intensity of light and the direction of travel of the light energy away from the source.

Contrast: Calculated evaluation of High, Medium, and Low contrast of visible light sources or surfaces within the property by a ratio of luminance. Contrast is the ratio of one surface luminance to a second surface luminance or to the field of view. Contrast exceeding 30 to 1 is usually deemed uncomfortable; 10 to 1 is clearly visible; and less than 3 to 1 appears to be equal.

Luminous Flux: Mean value of total Candelas produced by a light source. Luminous Flux describes the total amount of light emitted by a light source. The unit for measuring Luminous Flux is Lumen (lm).

Illuminance: Illuminance is the means of evaluating the density of Luminous Flux. Illuminance indicates the amount of Luminous Flux from a light source falling on a given area. Illuminance is measured in fc which is the lumens per square foot, or Lux which is lumens per square meter. Illuminance need not necessarily be related to a real surface since it may be

measured at any point within a space. Illuminance is determined from the Luminous intensity of the light source. Illuminance of a point source decreases with the square of the distance from the light source.

Luminance: Luminance is a measure of emissive or reflected light from a specific surface in a specific direction over a standard area. Luminance is measured in footlamberts (fL) (1/π candela per square foot) or cd/m^2 (candela per square meter), 1 fL = 3.43 cd/m^2. Whereas Illuminance indicates the amount of Luminous Flux falling on a given surface, Luminance describes the brightness of an illuminated or luminous surface. Luminance is defined as the ratio of luminous intensity of a surface (Candela) to the projected area of this surface (m^2 or ft^2).

Glare (due to light): Glare is visual discomfort experienced from high luminance or high range of luminance. For exterior environments at night, glare occurs when the range of luminance in a visual field is too large. The light energy incident at a point is measured by a scale of fc or lux, and is described in the technical term Illuminance. This incident light is not visible to the eye until it is reflected from a surface, such as pavement, wall, dust in the atmosphere or the surface of a light bulb. The visible brightness of a surface is measured in fL (or metric equivalent cd/m^2) and is described by the term Luminance.

The human eye processes brightness variations across a very broad spectrum of intensities. The range of brightness generated by direct noon sun versus a moonlight evening is over 5000 to 1. Human eyes are capable of accommodating to this range of intensities given adequate time to adjust. However, the eye cannot process brightness ratios of more than 30 to 1 within a view without discomfort.

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 743
- Assembly Bill 1560
- California Scenic Highways

- California Historic Parkways
- California Art Preservation Act
- California Building Standards Code
- California Vehicle Code
- County of Los Angeles LA River Master Plan
- General Plan Framework Element
- General Plan Conservation Element
- General Plan Transportation Element (Mobility Plan 2035)
- Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan
- Mulholland Scenic Parkway Specific Plan
- Los Angeles River Revitalization Master Plan
- Los Angeles River Design Guidelines
- Los Angeles Municipal Code (Including River Improvement Overlay)
- Citywide Design Guidelines

(1) State

(a) Senate Bill 743

As summarized above, SB 743, codified within 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." In addition, City of Los Angeles 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 CEQA Guidelines Appendix G. However, ZI No. 2452 requires that projects in TPAs be evaluated for consistency with relevant City land use plans and regulations governing scenic quality. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in Section IV.D, Cultural Resources, of this Draft EIR.

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

- "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 include any of the following:

  a) An existing rail or bus rapid transit station.

  b) A ferry terminal served by either a bus or rail transit service.

  c) The intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.

Projects that meet the criteria set forth in PRC 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 is located within an infill site and also represents an employment center as it is located within a zone that permits commercial uses and the Project would result in a floor area ratio greater than 0.75. In addition, as demonstrated in the Transit Priority Area Memorandum prepared by Gibson Transportation included as Appendix C.3, the Project is also located at the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. Specifically, at the intersection of Laurel Canyon Boulevard and Ventura Boulevard Metro Local Line 240 includes headways of approximately 9 to 10 minutes along Ventura Boulevard and Metro Local Line 230 includes headways of approximately 18 to 20 minutes along Laurel Canyon Boulevard. The Project Site is also located on a site listed by ZIMAS and identified by SCAG's

2024-2050 RTP/SCS as a TPA.[3,4] As such, based on the above, aesthetics impacts associated with the Project are determined to be less than significant and the analysis in this section is provided for informational purposes only.

(b) Assembly Bill 1560

AB 1560, codified at PRC Section 21060.2, supplements PRC Section 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 Section 21060.2 as a clearly defined bus station served by a bus rapid transit.

(c) California Scenic Highways

Appendix G of the CEQA 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

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[3] *City of Los Angeles, ZIMAS Parcel Profile Report for the Project, July 13, 2025.*

[4] *SCAG, 2045 Transit Priority Areas (TPAs)—SCAG Region, https://engage-socal-pilot-scag-rdp.hub.arcgis.com/datasets/10edc64279ff4ebeb99a191161416422_0/explore?location=34.139798%2C-118.380930%2C15.29, accessed July 13, 2025.*

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 designated State Scenic Highway within the City of Los Angeles includes portions of the Topanga Canyon State Scenic Highway (State Route [SR] 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 (SR-110), runs northeasterly from the four-level interchange with US-101 just outside of downtown Los Angeles (milepost 23.69) to East Glenarm Street in the City of Pasadena (milepost 31.89).

(e) California Building Standards Code

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, includes the California Building Code, California Green Building Standard (CALGreen) Code, and the California Energy Code (Energy Code), among others. CALGreen Code Section 5.106.8 and Energy Code Section 140.7 limit light trespass and glare at any new sign, building property line, or center line of adjacent transportation right-of-way according to the outdoor lighting zones established by the Energy Code. However, the Energy Code provides exceptions for signs that comply with the energy use and lighting controls requirements within Energy Code Sections 130.3 and 140.8.

The Energy Code includes designations for Lighting Zones (LZ) 1 through 4, (refer to Appendix D of the Lighting Report), which correspond to the Light Trespass Illuminance recommendations within the Illuminating Engineering Society of North America (IESNA) 10th Edition Handbook, Table 26.4, included as Appendix E and F of the Lighting Report. The IESNA recommendations for light trespass illuminance vary based upon the extent of nighttime human activity and the extent of natural habitat. All urban areas within California are designated Lighting Zone 3 as the default under the Energy Code, which limits the light trespass illuminance to 8 lux (0.74 fc). The Project Site is within the City of Los Angeles, which, as an urban area, is designated by the Energy Code as Lighting Zone 3. In addition, the IESNA defines Lighting Zone 3 as "areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial uses and shipping and rail yards with high nighttime activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active exterior retail areas."

IESNA Table 26.5 lists a pre-curfew 8 lux (0.74 footcandles) maximum at the location where trespass is under review for Lighting Zone 3. The Energy Code is well defined and supported by the IESNA and the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE), and other independent lighting organizations, such as the International Dark Sky Organization and U.S. Green Building Council.

(f) California Vehicle Code, Division 11. Rules of the Road

Chapter 2, Article 3 of the California Vehicle Code (CVC) Division 11, Rules of the Road, stipulates limits to the location of light sources that may cause glare and impair the vision of drivers. CVC Section 21466.5 provides in relevant part:

> *No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.*
>
> *The brightness reading of an objectionable light source shall be measured with a 112-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.*

The Lighting Report analyzes the standard set forth in CVC Section 21466.5 as it applies to the Project on drivers within adjacent streets.

(2) County

(a) LA River Master Plan

The County's LA River Master Plan, adopted in 2022, builds on this history of planning and includes over two decades of planning and implementation efforts for the Los Angeles River, including efforts by Los Angeles County (1996), the City (2007), the Los Angeles River Ecosystem Restoration Feasibility Study (also known as the ARBOR Study, 2015), the Lower Los Angeles River Working Group (2018), and the Upper Los Angeles River and Tributaries (ULART) Working Group (2019). The County's LA River Master Plan is organized by a series of goals, actions, and methods. Each goal represents an equally important active future priority for the Los Angeles River. These goals include the following:

- Reduce flood risk and improve resiliency.
- Provide equitable, inclusive, and safe parks, open space, and trails.
- Support healthy connected ecosystems.
- Enhance opportunities for equitable access to the river corridor.
- Embrace and enhance opportunities for arts and culture.
- Address potential adverse impacts to housing affordability and people experiencing homelessness.
- Foster opportunities for continued community engagement, development, and education.
- Improve local water supply reliability.
- Promote healthy, safe, clean water.

Note that the City's Los Angeles River Revitalization Master Plan (LARRMP) and River Improvement Overlay District (RIO), discussed below, are identified as one of the four planning overlays within the County LA River Master Plan. In addition, the portion of the area adjacent to the Tujunga Wash within the Project vicinity is also identified as part of the ULART Revitalization Plan Opportunity Areas.

(3) 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.[5] The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development.[6] Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the aesthetics and visual appearance of the urban environment immediately surrounding the Project (Objective 5.5).[7]

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.[8] "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.[9] The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.J, Land Use and Planning, of this Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project's consistency with the Framework Element is provided in Section IV.J, Land Use and Planning, of this Draft EIR. The aesthetics goals, objectives, and policies of the Framework Element that are applicable to the Project are listed in Table IV.A-4 on page IV.A-77 in the impact analysis under Threshold (c) later in this section.

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

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

[7] *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.*

[8] *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.*

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

(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."[10] To the extent the policies included in the Conservation Element relate to aesthetics, Project consistency with these policies is analyzed later in this section.

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

The General Plan's Transportation Element, Mobility Plan 2035 (Mobility Plan; 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 also includes Scenic Highway Guidelines for those designated scenic highways for which there is no adopted scenic corridor plan. To the extent the policies included in the Mobility Plan relate to aesthetics, Project consistency with these policies is analyzed later in this section.

(d) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

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 Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan) area.[11] The Community Plan identifies goals, objectives, and policies related to aesthetics for each land use type (residential, commercial, etc.) along with a set of separate urban design standards applicable to new development in the community plan areas. The aesthetics-related goals, objectives, policies and standards of the Community Plan applicable to the Project are listed in Table IV.A-4 on page IV.A-77 in the impact analysis under Threshold (c) later in this section. The Community Plan's General Plan Land Use Map also designates a series of Scenic View Sites along Mulholland Drive overlooking the San Fernando Valley and the Santa Susana Mountains (to

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

[11] *City of Los Angeles, ZIMAS Parcel Profile Report for the Project, January 31, 2024.*

the northwest) and San Gabriel Mountains (to the northeast).[12] Many of these Scenic View Sites overlap with the Major Vista Points designated in the Mulholland Scenic Parkway Specific Plan (discussed in Subsection 2.a.(2)(e) below). It is noted that the City is currently in the process of updating the Community Plan.[13] However, because the update is not yet adopted, the existing version of the Community Plan, adopted in 1998, is used for the purpose of this analysis.

(e) Mulholland Scenic Parkway Specific Plan

The Mulholland Scenic Parkway Specific Plan (Mulholland Specific Plan) was adopted on May 13, 1992. The Mulholland Specific Plan includes land use regulations for development along the Mulholland Scenic Parkway, which generally includes land along Mulholland Drive between Mulholland Highway and the US-101 within the Santa Monica Mountains further to the south of the Project Site. The purposes of the Mulholland Specific Plan are as follows:

A. To assure maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources.

B. To preserve Mulholland Drive as a slow-speed, low-intensity drive.

C. To preserve and enhance land having exceptional recreational and/or educational value.

D. To assure that land uses are compatible with the parkway environment.

E. To assure that the design and placement of buildings and other improvements preserve, complement and/or enhance views from Mulholland Drive.

F. To preserve the existing residential character of areas along and adjoining the right-of-way.

G. To minimize grading and assure that graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains.

H. To preserve the natural topographic variation within the Inner and Outer Corridors.

I. To reduce the visual intrusion caused by excessive lighting.

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[12] *City of Los Angeles, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, adopted May 13, 1998, General Plan Land Use Map, as of February 5, 2013.*

[13] *City of Los Angeles. Community Plan Updates, https://planning.lacity.gov/community-plan-update/southeast-valley, accessed January 15, 2025.*

J. To minimize driveway and private street access into the right-of-way.

K. To preserve the existing ecological balance.

L. To protect prominent ridges, streams, and environmentally sensitive areas; and the aquatic, biologic, geologic, and topographic features therein.

M. To protect all identified archaeological and paleontological resources.

N. To provide a review process of all projects which are visible from Mulholland Drive to assure their conformance to the purposes and development standards contained in the [Mulholland] Specific Plan and the Landform Grading Manual.

The Mulholland Specific Plan establishes inner and outer corridor areas along Mulholland Drive and sets forth specific regulations for these areas. The Project Site is not located within an inner or outer corridor area. The Mulholland Specific Plan also identifies 14 Major Vista Points along Mulholland Drive which the Mulholland Specific Plan defines as "An area in the Mulholland Drive right-of-way, designated on maps 1A through 6B, which has exceptional mountain, ocean and/or city views and is set aside for public use." Many of these Major Vista Points overlap with the Scenic View Sites designated along Mulholland Drive in the Community Plan (discussed in Subsection 2.a.(2)(d) above). While the regulations in the Mulholland Specific Plan (Section 9) are focused on protecting the integrity of the Major Vista Point locations themselves, rather than on protecting the views available from these viewpoints, the impact analysis later in this section evaluates the potential impacts of the Project on the views available from a representative set of these viewpoints under CEQA Threshold (a), "Have a substantial adverse effect on a scenic vista?"

(f) Los Angeles River Revitalization Master Plan

The LARRMP was adopted by the City in 2007 to provides a framework for restoring the Los Angeles River's ecological function and for transforming it into an amenity for residents and visitors to the City. The LARRMP includes recommendations: (1) for physical improvements to the Los Angeles River corridor and to the green space network in adjacent neighborhoods; (2) at a policy level for managing public access and ensuring public health and safety; (3) for a Los Angeles River governance and management structure; and (4) for short- and long-term priority projects and potential funding strategies. The goals of the LARRMP include revitalizing the Los Angeles River, greening the neighborhoods, capturing community opportunities, and creating value.[14] The sub-goals and recommendations of the

[14] *City of Los Angeles, Los Angeles River Revitalization Master Plan, April 2007.*

LARRMP most related to aesthetics are listed in the impact analysis later in this section along with an analysis of consistency with these sub-goals and recommendations.

(g) 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. Several of the provisions in the LAMC that are applicable to the Project were established as part of the RIO District. In addition, the LAMC also includes specific regulations relative to lighting. These code sections applicable to aesthetics are also described below.

(i) Los Angeles River Improvement Overlay District

An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. Projects located in an overlay must demonstrate compliance with all applicable regulations.

Effectuated by Ordinance No. 183,145 in August 2014, the RIO District enables the City to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a special use district that requires new development projects to follow and implement applicable development regulations and design guidelines (i.e., River Design Guidelines).[15] The purposes of the RIO District are to support the goals of the LARRMP; contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle, and other multi-modal connections between the Los Angeles River and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the Los Angeles River; promote Los Angeles River identity; and support the City's stormwater ordinances and programs. The provisions of the RIO have been incorporated into Sections 12.03, 12.04, 12.32, and 13.17 of the LAMC. In addition, in accordance with Ordinance No. 183,145 and Section 13.17 (H) of the LAMC, the City established the Los Angeles River Design Guidelines (River Design Guidelines), which are discussed further below.

[15] *City of Los Angeles, Los Angeles River Design Guidelines, July 29, 2015.*

(ii) 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, Section 12.21 A.5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

- Chapter I, Article 3, Section 13.17 F.3. Exterior Site Lighting within the RIO: (a) all site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down); (b) all low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such manner as to not exceed the limitation specified in Subdivision 3.(a).

- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than 3 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 2 foot-candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.

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

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

3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[16]

(h) Los Angeles River Design Guidelines

In accordance with Ordinance No. 183,145, the City established the River Design Guidelines in 2015. The River Design Guidelines supplement the RIO regulations and provide options, solutions and techniques to improve the aesthetic quality of the Los Angeles River; increase the availability of publicly accessible open space; and utilize public right-of way as locations to capture and treat stormwater. The River Design Guidelines are not zoning regulations or development standards. The relevant River Design Guidelines, along with an analysis of Project consistency with such guidelines, are provided under Threshold (c) later in this section.

(i) Citywide Design Guidelines

Adopted in 2019, the Citywide Design Guidelines (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 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.

[16] *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 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.

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 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 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 Guidelines are intended as a more flexible, less prescriptive means of shaping proposed projects and conveying general design expectations.

b. Existing Conditions

The Project Site is located near the northeastern corner of Radford Avenue and Ventura Boulevard on the floor of the San Fernando Valley within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area of the City. More specifically, the approximately 55-acre Project Site is comprised of 4200 North Radford Avenue (North Lot), 4024 and 4064 North Radford Avenue (South Lot), and two unaddressed parcels located within and around the Los Angeles River and Tujunga Wash. As shown in Figures II-1 and II-2 in Section II, Project Description, of this Draft EIR, the Project Site is generally bounded by and includes the Los Angeles River and Tujunga Wash[17] to the north and east, Colfax Avenue to the east, a public alley to the south with various commercial uses across the alley fronting Ventura Boulevard, and Radford Avenue to the west. The North and South Lots are bisected by the Los Angeles River.

The Project Site is currently improved with 1,179,110 square feet of studio-related uses, including 359,730 square feet of sound stages; 255,510 square feet of production support;

[17] *The Tujunga Wash is a tributary of the Los Angeles River and runs along the east of the North Lot.*

450,060 square feet of production office; and 113,810 square feet of general office. As shown in Figure II-3 of Section II, Project Description, of this Draft EIR, the North and South Lots are currently improved with multiple buildings and internal access roads. These buildings include 21 sound stages, each ranging in size from approximately 7,000 square feet to approximately 25,000 square feet, as well as production support, production office, and general office uses. These buildings range from approximately 30 feet to 71 feet in height from existing grade. The Project Site also contains 52 permanent buildings/structures, various internal roads, basecamps, and outdoor areas. The existing buildings are primarily located at the northernmost point of the North Lot and throughout the entirety of the South Lot.

Outdoor production activity areas occur throughout the Project Site, as shown in Figure II-4 of Section II, Project Description, of this Draft EIR. These outdoor production activity areas are comprised of 1,045,000 square feet. As shown in Figure II-5 of Section II, Project Description, of this Draft EIR, basecamps, which are contained within the outdoor production activity areas, comprise approximately 376,000 square feet and typically occur within existing parking areas and other outdoor areas. As shown in Figure II-6 in Section II, Project Description, of this Draft EIR, existing vehicle parking is located in multiple above-grade parking structures accessible from Radford Avenue and Colfax Avenue, as well as surface parking areas throughout the Project Site, for a total of 3,095 existing on-site vehicle spaces.

As discussed in detail in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures, as well as the potential Mack Sennett Historic District, which includes ten buildings of which six are considered contributing buildings to the potential historic district.

The Project Site perimeter is secured with a combination of chain link, wrought iron, and block wall/chain link fencing, some of which are lined with trees, shrubs, and climbing vines. Landscaping within the Project Site includes trees and shrubs, with street along Radford Avenue.

In terms of topography, the Project Site generally slopes gently towards the direction of the Los Angeles River and Tujunga Wash. Project Site elevations range from approximately 585 feet to 617 feet above mean seal level (AMSL).

The Community Plan designates the Project Site as Light Industrial for the North Lot, Light Manufacturing for the South Lot, and Open Space for the Tujunga Wash and Los Angeles River areas. The North Lot is zoned [Q]MR2-1L-RIO (subject to a “Q” Qualified Classification or Q Condition, Restricted Light Industrial Zone, Height District 1L, River Improvement Overlay) and the South Lot is zoned [Q]M2-1-RIO (subject to a “Q” Qualified Classification, Light Industrial Zone, Height District 1, River Improvement Overlay). The portions of the Project Site

containing the Los Angeles River and Tujunga Wash are zoned OS-1XL-RIO (Open Space Zone, Height District 1XL, River Improvement Overlay).

The Project Site is located in an urbanized area that is developed with a mix of land uses. Immediately west of the South Lot across Radford Avenue are a four-story apartment complex, an automobile repair shop, and a single-story, single-tenant restaurant building. To the west and south of the South Lot is a six-story (approximately 75-foot-high) office building located along Radford Avenue and Ventura Place. Further west of the South Lot is a neighborhood of several multi-family residential developments. Immediately west of the North Lot across Radford Avenue are various one-, two-, and three-story low- and medium-density single- and multi-family residential developments. Further west of the North Lot is a neighborhood of several single-family residential developments. Low- and mid-rise commercial buildings and mini shopping centers occupied by general office uses, restaurants, retail uses, automobile repair shops, motels, and government uses are located south of the Project Site, across the abutting public alley and fronting Ventura Boulevard. Properties along the south side of Ventura Boulevard are improved with similar uses. Further to the south beyond Ventura Boulevard are three- and four-story multi-family residential buildings and Carpenter Community Charter School. To the north and east, the Project Site is bounded by the Tujunga Wash and Los Angeles River, respectively, which provide approximately 97-foot to 150-foot buffers from the residential uses across those channels. Many of the streets in the vicinity of the Project Site are lined with street trees, and the major arterials exhibit substantial commercial signage, including multiple large double-faced, off-site billboard signs along Ventura Boulevard.

The Santa Susana Mountains lie approximately 10 miles to the north and northwest of the Project Site. The San Gabriel Mountains lie approximately six miles to the northeast of the Project Site. In addition, the Santa Monica Mountains lie approximately 0.25 miles to the south of the Project Site.

(1) Scenic Vistas

As indicated previously, the term “scenic vista” generally refers to visual access to, or the visibility of, a particular site from a given vantage point or corridor. The 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 of a broad geographic area). 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.

As discussed in the Regulatory Framework subsection above, both the Community Plan and the Mulholland Specific Plan designate a series of public viewpoints along Mulholland

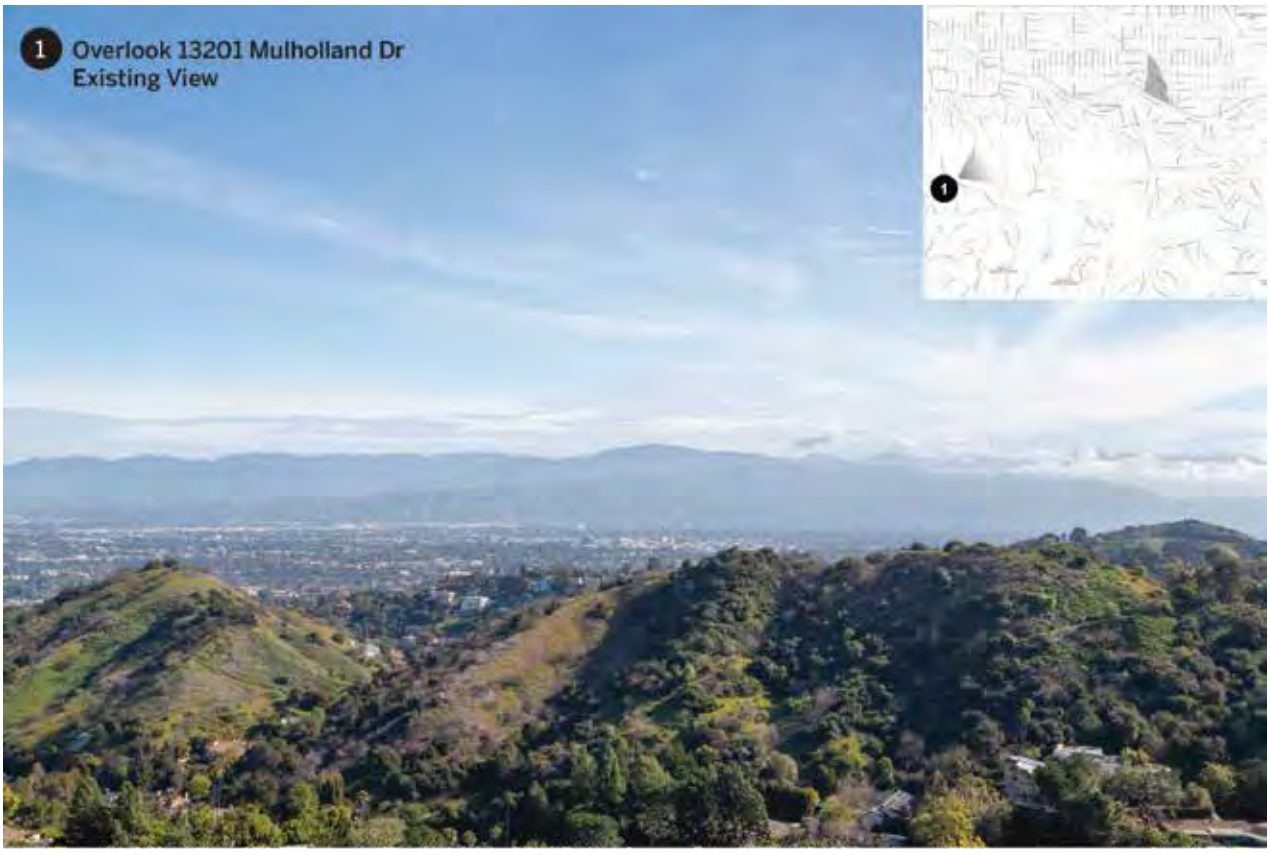
Drive, some of which overlook the San Fernando Valley and the Santa Susana Mountains (to the north and northwest) and San Gabriel Mountains (to the northeast). The Project Site is visible from some of these viewpoints. Seven of these viewpoints were analyzed (Viewpoints 1 through 7 as identified in Figure IV.A-1 on page IV.A-22), as they represent public viewpoints that are most proximate to the Project Site. Note that the Community Plan includes two Scenic View Sites that are located to the south of the Project Site within private gated residential areas along Mulholland Drive that are not publicly accessible. These private locations are generally located at similar distances from the Project Site as Viewpoints 1 through 7. As these two locations represent private views that are not protected under CEQA and would be similar to the views of the Project Site represented by Viewpoints 1 through 7, they are not included in this analysis. A description of Viewpoints 1 through 7 is provided below. The text in the brackets in the names of the viewpoints identifies whether the viewpoint is identified as a Scenic View Site in the Community Plan [CP] and/or a Major Vista Point in the Mulholland Specific Plan [SP].

- Viewpoint 1 (Overlook—13201 Mulholland Drive [CP/SP]): As shown in Figure IV.A-2 on page IV.A-23, Viewpoint 1 is an elevated northeasterly public view along Mulholland Drive to the southwest of the Project Site. Views include the northerly foothills of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline in the midground, and the Santa Susana and San Gabriel Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., the undeveloped foothills, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. Intervening topography blocks views of the Project Site from this viewpoint.

- Viewpoint 2 (Barbara Fine Summit Overlook—11801 Mulholland Drive [CP/SP]): As shown in Figure IV.A-3 on page IV.A-24, Viewpoint 2 is an elevated northeasterly public view to the south of the Project Site. Views include the Santa Monica Mountains and associated foothills with a deep vegetated valley in the foreground and midground. A small portion of the San Fernando Valley skyline and/or Santa Susana Mountains may also be visible in the upper left background on a clear day. With the broad (panoramic) views of scenic resources (largely undeveloped Santa Monica Mountains and associated foothills), the view from this viewpoint represents a scenic vista. Intervening topography and vegetation block views of the Project Site from this viewpoint.

Figure IV.A-1
View Location Map

Source: SOM, 2024.



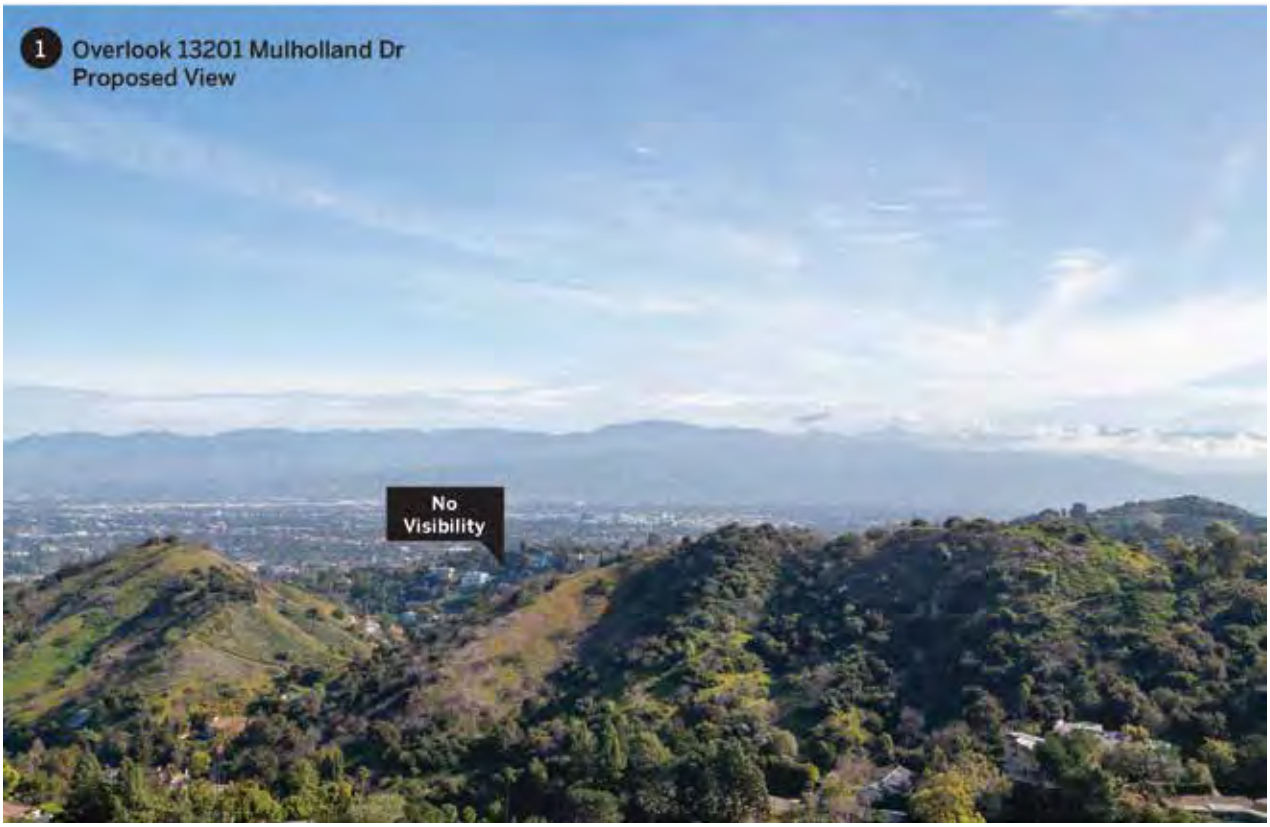


Figure IV.A-2
Viewpoint 1 - Existing and Proposed View
from Overlook at 13201 Mulholland Drive

Source: SOM, 2024.

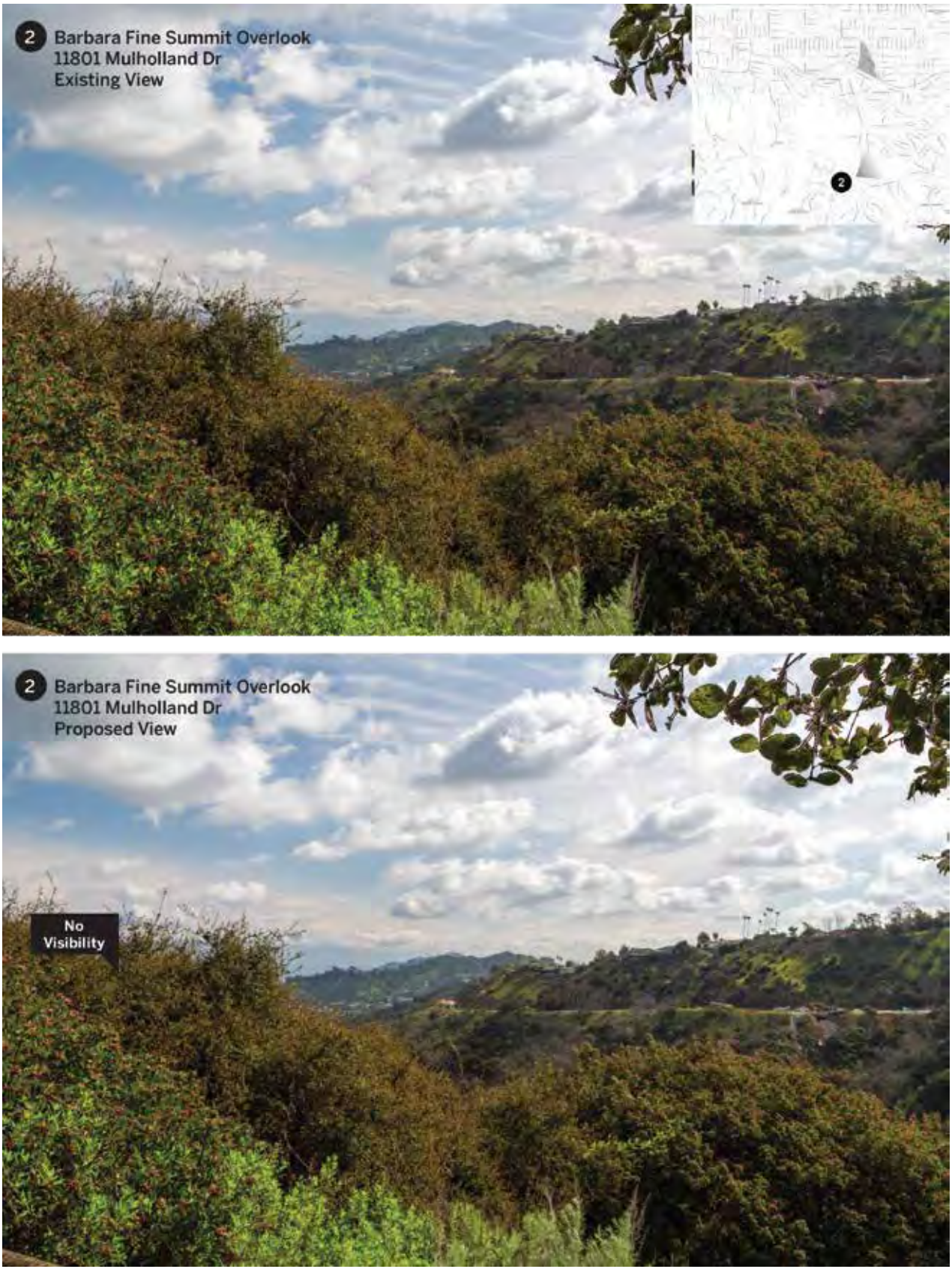


Figure IV.A-3
Viewpoint 2 - Existing and Proposed View
from Barbara Fine Summit Overlook at 11801 Mulholland Drive

Source: SOM, 2024.

- Viewpoint 3 (Unnamed Mulholland Drive Overlook 01 [CP]): As shown in Figure IV.A-4 on page IV.A-26, Viewpoint 3 is an elevated northerly public view to the south of the Project Site. Views include the Santa Monica Mountains and associated foothills with a deep vegetated valley in the foreground, the San Fernando Valley skyline and a small portion of the San Gabriel Mountains in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., the foothills, Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The mid- and upper levels of many of the buildings on the Project Site are visible near the center of the view close to where the foothills transition to the valley floor.

- Viewpoint 4 (Autry Overlook—8601 Mulholland Drive [SP]): As shown in Figure IV.A-5 on page IV.A-27, Viewpoint 4 is an elevated northerly public view located to the south of the Project Site. Views include the northerly foothills of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., the semi-developed but well-vegetated/treed foothills, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The upper levels of some of the buildings on the Project Site are visible near the horizontal center at the transition between the foothills and the valley floor from this viewpoint.

- Viewpoint 5 (Dead Man Overlook—8591 Mulholland Drive [SP]): As shown in Figure IV.A-6 on page IV.A-28, Viewpoint 5 is an elevated expansive northerly public view located to the south of the Project Site. Views include the northerly foothills of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., the semi-developed but well-vegetated/treed foothills, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The upper levels of some of the buildings on the Project Site are visible near the horizontal center at the transition between the foothills and the valley floor from this viewpoint.

- Viewpoint 6 (Nancy Hoover Pohl Overlook—8401 Mulholland Drive [SP]): As shown in Figure IV.A-7 on page IV.A-29, Viewpoint 6 is an elevated expansive northerly public view located to the south of the Project Site. The view includes the northerly foothills of the Santa Monica Mountains in the foreground including undeveloped hillside and a trail, the San Fernando Valley skyline in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., undeveloped foothill area, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The tops of some of the existing on-site buildings are barely visible in the center of the view over a high point in the foothills at the transition between the foothills and the valley floor from this viewpoint.

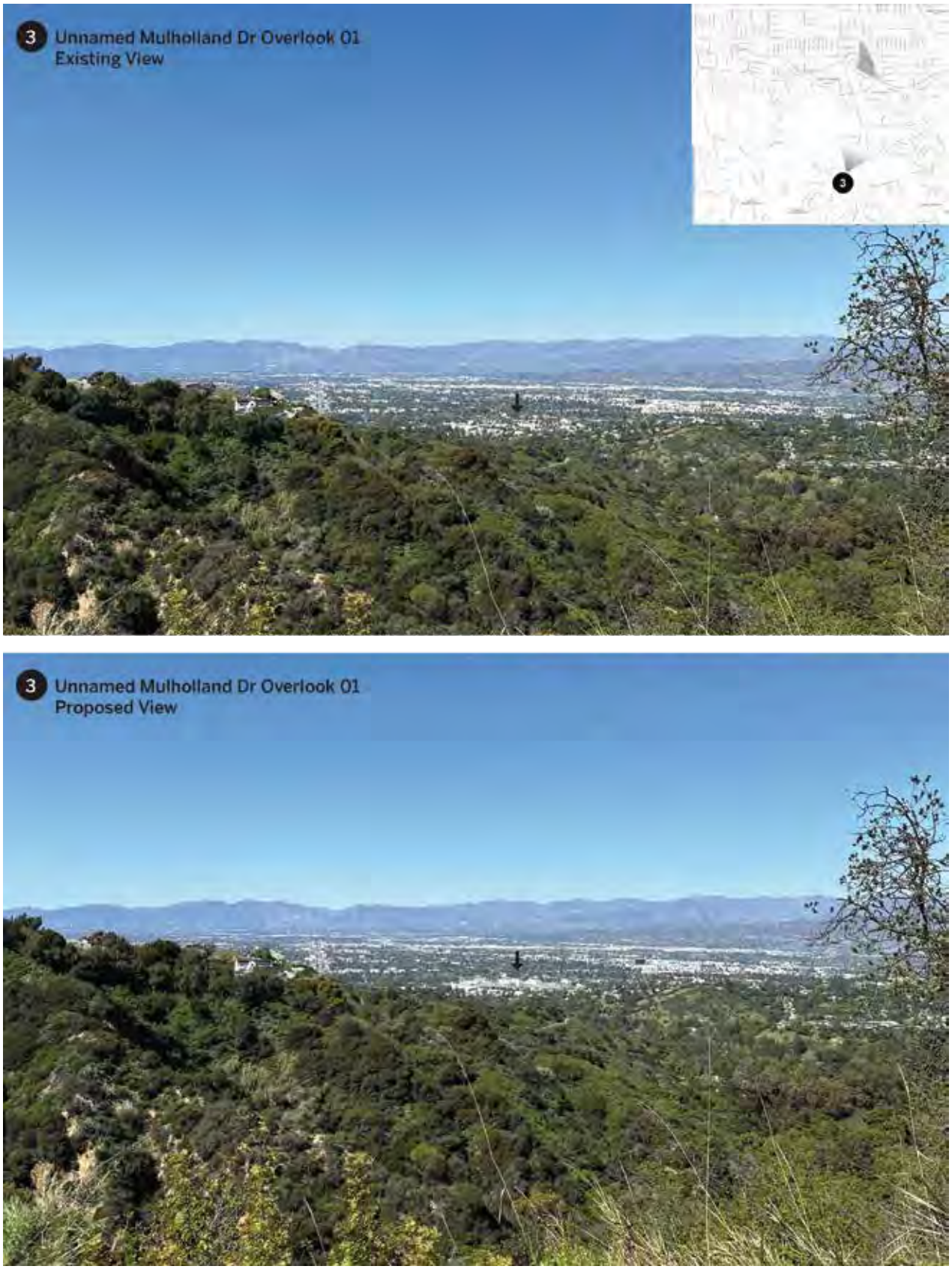
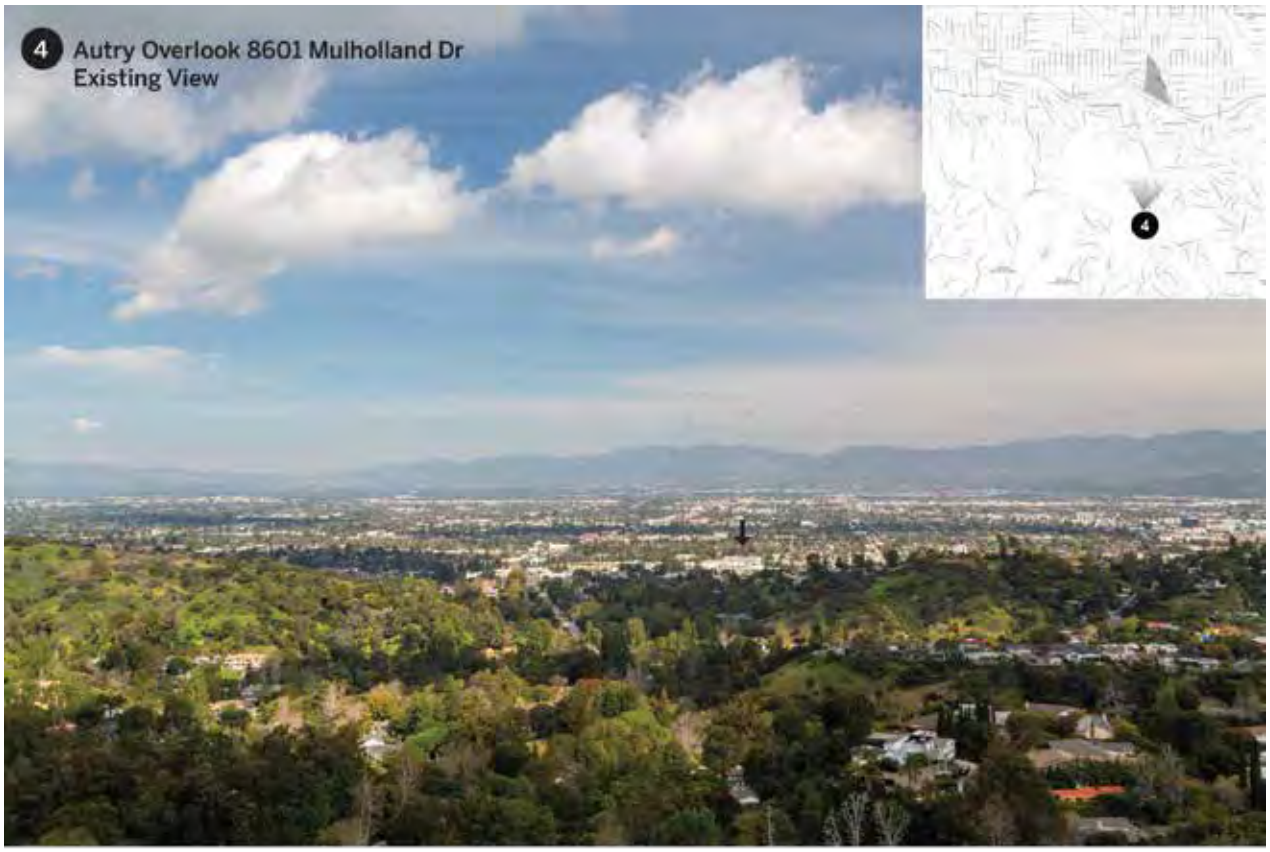


Figure IV.A-4
Viewpoint 3 - Existing and Proposed View
Unnamed Mulholland Drive Overlook

Source: SOM, 2024.



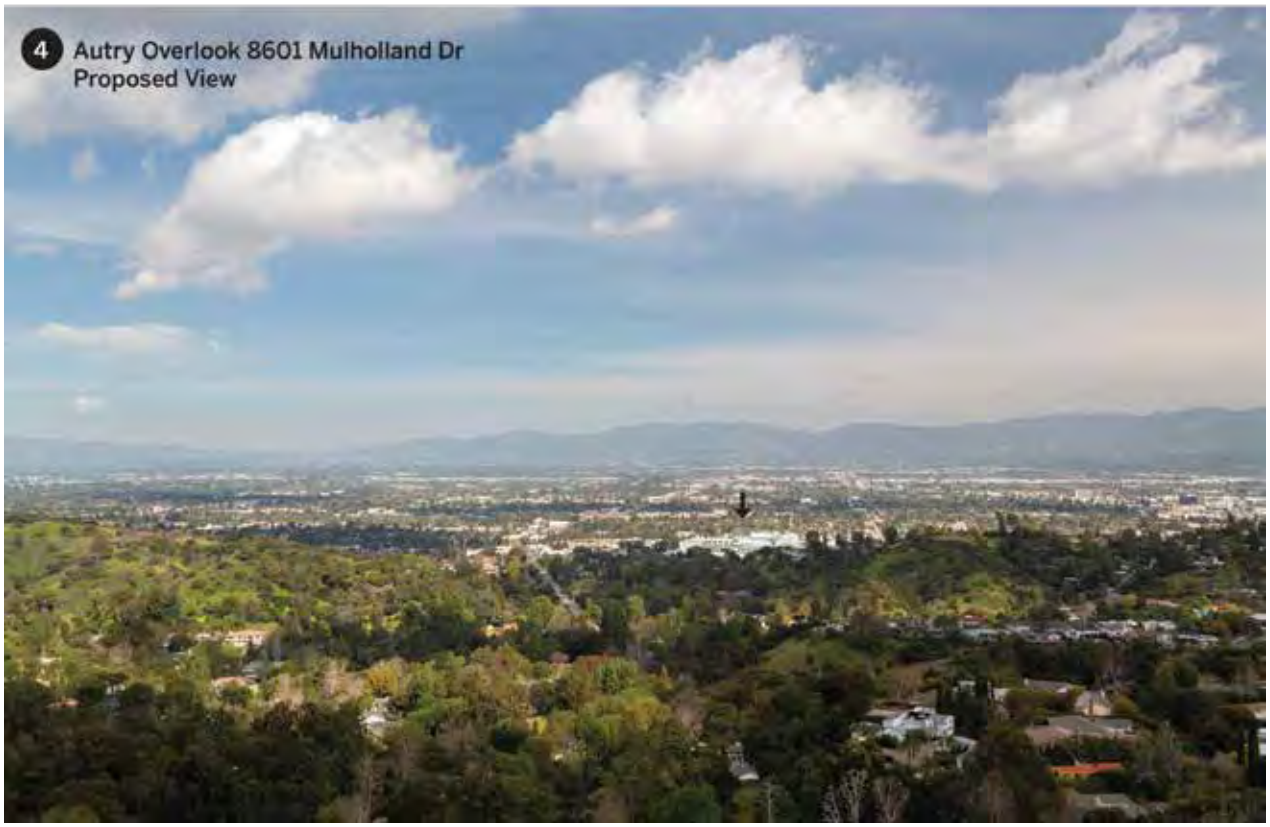


Figure IV.A-5
Viewpoint 4 - Existing and Proposed
View from Autry Overlook at 8601 Mulholland Drive

Source: SOM, 2024.

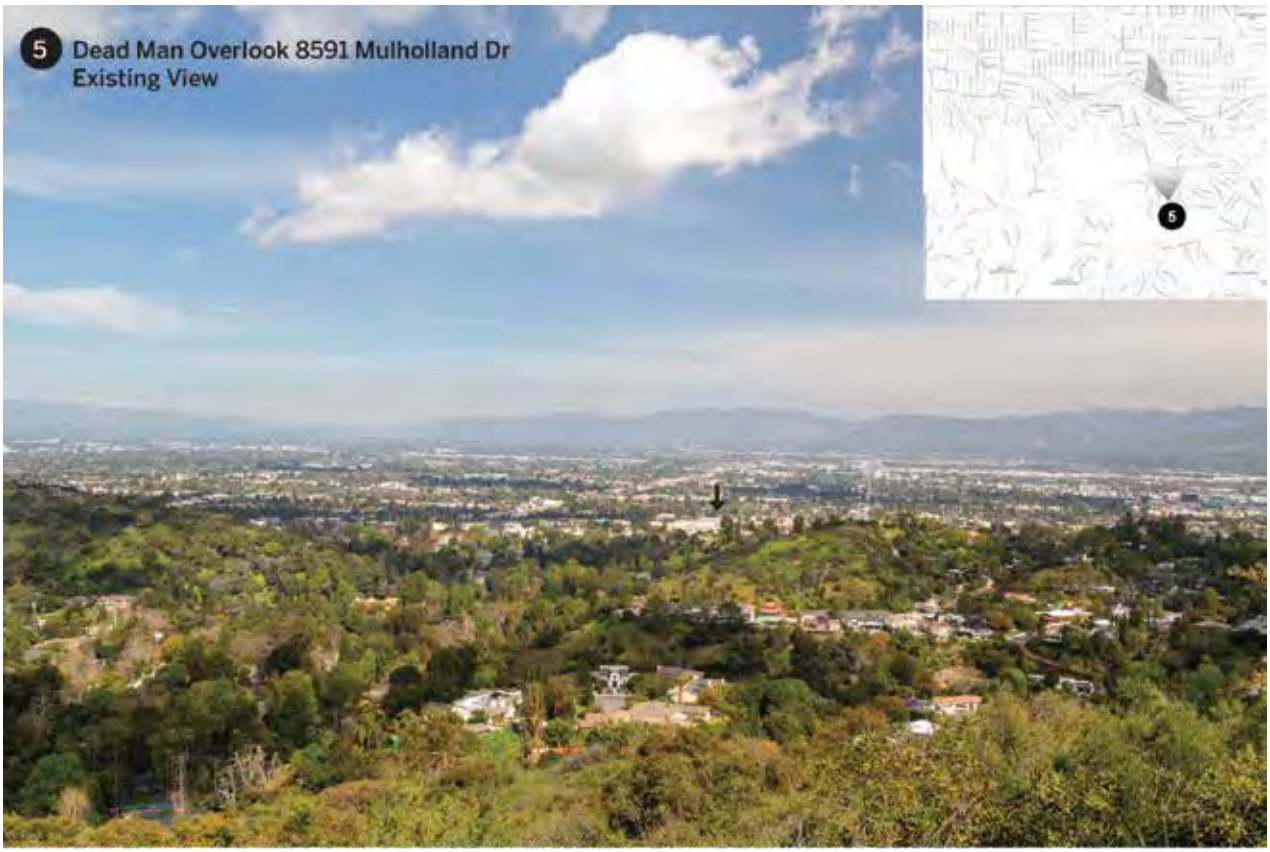


Figure IV.A-6
Viewpoint 5 - Existing and Proposed View
from Dead Man Overlook at 8591 Mulholland Drive

Source: SOM, 2024.

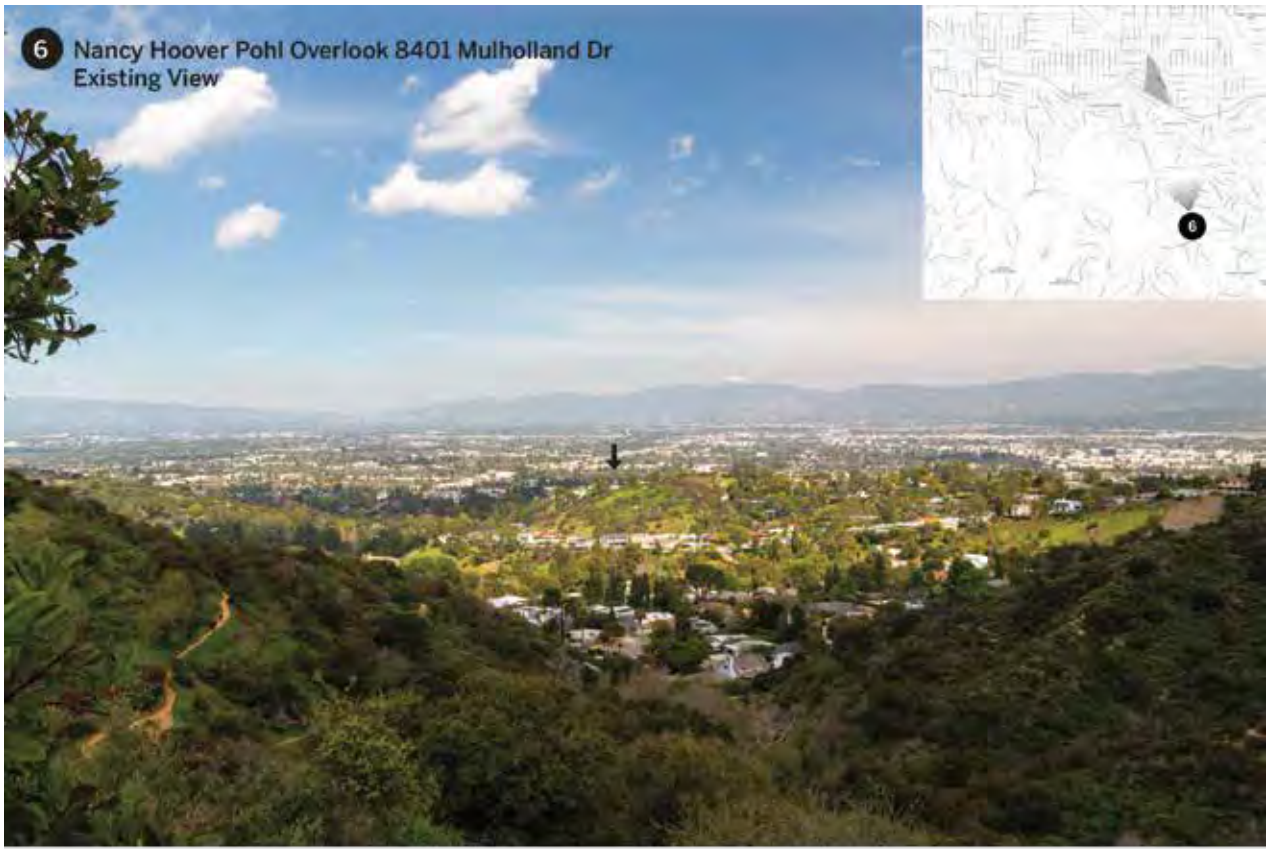


Figure IV.A-7
Viewpoint 6 - Existing and Proposed View
from Nancy Hoover Pohl Overlook at 8401 Mulholland Drive

Source: SOM, 2024.

- Viewpoint 7 (Universal City Overlook—7701 Mulholland Drive [CP/SP]): As shown in Figure IV.A-8 on page IV.A-31, Viewpoint 7 is an elevated expansive northwesterly public view located to the southeast of the Project Site. Views include the northerly foothills of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline with Universal City in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., partially developed foothill area, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The Project Site is somewhat visible on the left side (west) of the view shortly after the transition of the view from the foothills to the valley floor.

Four views along public streets and trails at a higher elevation than the Project Site (i.e., in the Santa Monica foothills) were analyzed, as these view locations are representative of public views proximate to the Project Site. These public views are identified as Viewpoints 8 through 13 as shown in Figure IV.A-1 on page IV.A-22.

- Viewpoint 8 Trail #1 within Wilacre Park): As shown in Figure IV.A-9 on page IV.A-32, Viewpoint 8 is an elevated expansive northeasterly public view located on a public trail to the southwest of the Project Site. Views include the well-vegetated/treed northerly foothills of the Santa Monica Mountains in the immediate foreground, the San Fernando Valley skyline in the far foreground and midground, and the Santa Susana and San Gabriel Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., partially developed foothill area, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The Project Site is visible on the right side (east) of the view shortly after the transition from the foothills to the valley floor.

- Viewpoint 9 (Trail #2 within Wilacre Park): As shown in Figure IV.A-10 on page IV.A-33, Viewpoint 9 is an elevated northeasterly public view located to the south of the Project Site. The view includes well-vegetated/treed northerly foothills of the Santa Monica Mountains in the immediate foreground, the San Fernando Valley skyline in the far foreground and midground, and the Santa Susana and San Gabriel Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., partially developed foothill area, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The Project Site is visible in the right half of the view shortly after the transition from the foothills to the valley floor.

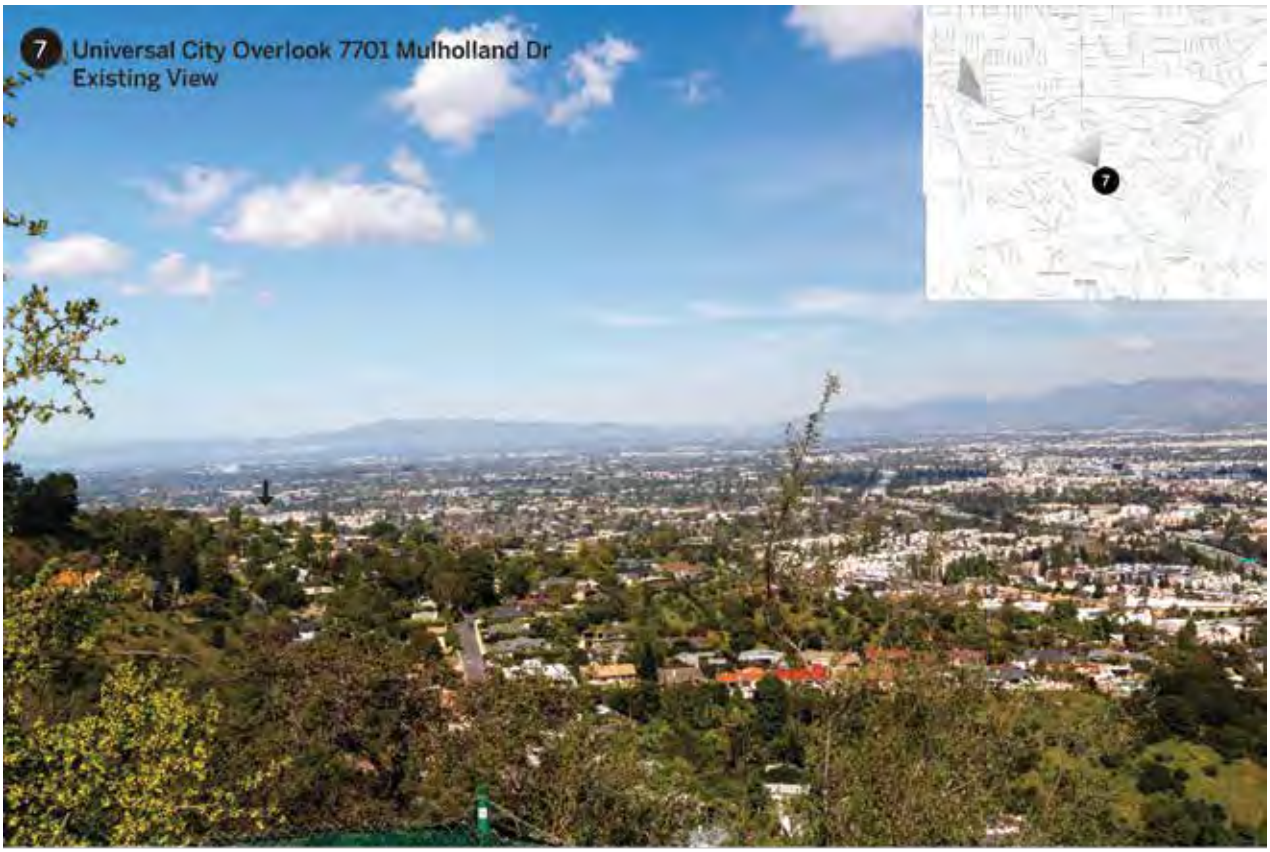


Figure IV.A-8
Viewpoint 7 - Existing and Proposed View
from Universal City Overlook at 7701 Mulholland Drive

Source: SOM, 2024.

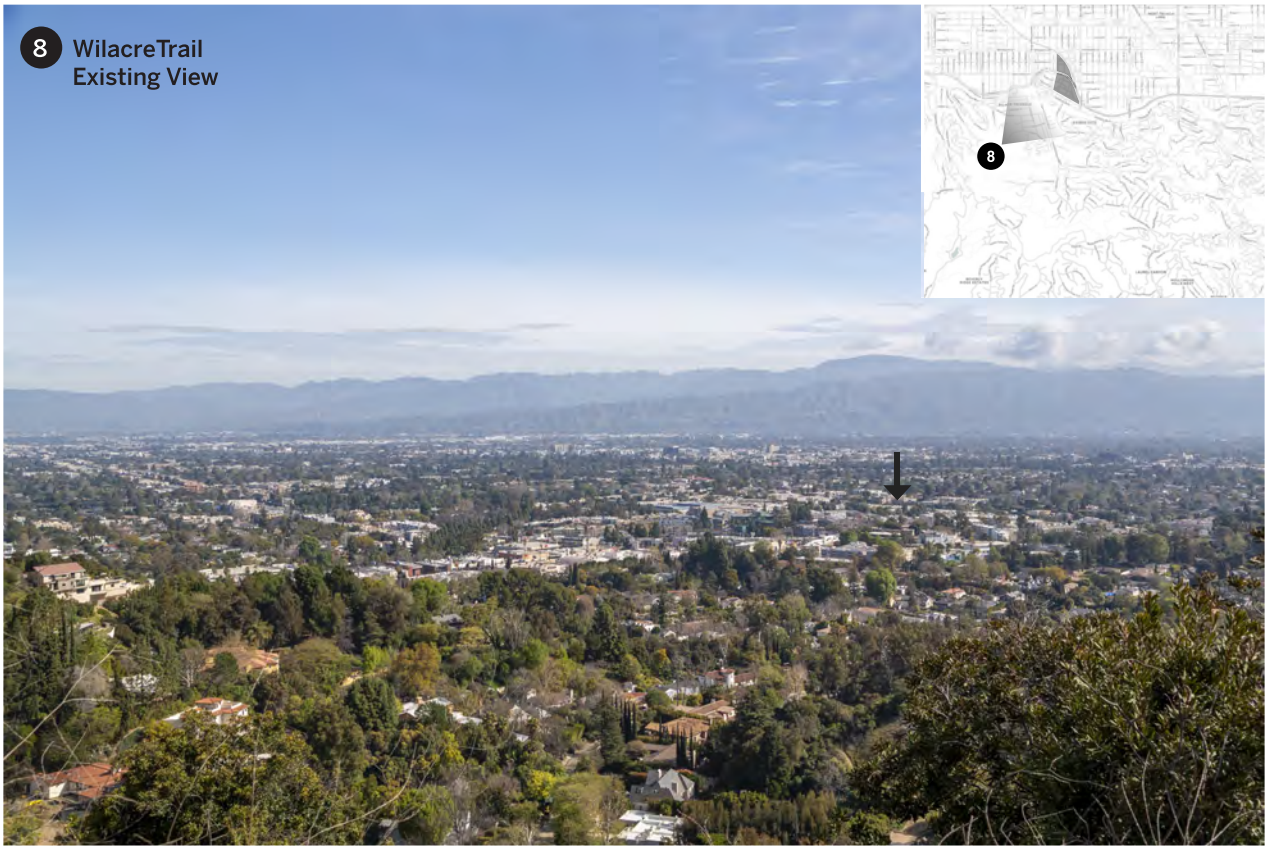


Figure IV.A-9
Viewpoint 8 - Existing and Proposed View from Wilacre Trail - 1

Source: SOM, 2024.

Figure IV.A-10
Viewpoint 9 - Existing and Proposed View from Wilacre Trail - 2

Source: SOM, 2024.

- Viewpoint 10 (Sunswept Drive): As shown in Figure IV.A-11 on page IV.A-35, Viewpoint 10 is an elevated northeasterly partial public view located approximately to the southwest of the Project Site. Views through existing development include the well-vegetated/treed northerly foothills of the Santa Monica Mountains in the immediate foreground, the San Fernando Valley skyline in the far foreground and midground, and the San Gabriel Mountains in the background (partially obscured by the carport roof). The Project Site is visible in the right third of the view shortly after the transition from the foothills to the valley floor. Due to fencing, topography, and existing development along Sunswept Drive, public views of the Project Site from Sunswept Drive are limited.

- Viewpoint 11 (Laurelwood Drive): As shown in Figure IV.A-12 on page IV.A-36, Viewpoint 11 is an elevated northerly public view located to the south of the Project Site on Laurelwood Drive. The view includes well-vegetated/treed northerly foothills of the Santa Monica Mountains in the immediate foreground, the San Fernando Valley skyline in the far foreground and midground, and the Santa Susana and San Gabriel Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., partially developed but well-treed foothill area, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. This viewpoint offers a comprehensive public view of the Project Site due to its orientation and elevated nature. Due to vegetation, fencing and existing development along Laurelwood Drive, most public views of the Project Site from along Laurelwood Drive are limited.

- Viewpoint 12 (Laurelcrest Drive): As shown in Figure IV.A-13 on page IV.A-37, Viewpoint 12 is an elevated northwesterly partial public view located to the southeast of the Project Site. Views above the existing residences include the well-treed foothill neighborhood of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline in the midground, and the Santa Susana Mountains in the background. While the view from this viewpoint is not especially broad, it, nevertheless, includes a view of a swath of scenic resources (i.e., the San Fernando Valley skyline and mountains) such that it is conservatively characterized as a scenic vista. Some of the existing buildings on the Project Site are just visible above the house in the foreground to the left of the tall tree. Due to vegetation, fencing and existing development along Laurelwood Drive, public views of the Project Site from Laurelcrest Drive are limited.

- Viewpoint 13 (11241 Laurie Drive): As shown in Figure IV.A-14 on page IV.A-38, Viewpoint 13 is an elevated somewhat expansive northwesterly public view located to the southeast of the Project Site. The view includes the well-vegetated/treed northerly foothills of the Santa Monica Mountains in the foreground, the San Fernando Valley skyline in the midground, and the Santa Susana Mountains in the background. With the broad (panoramic) views of scenic resources (i.e., the semi-developed but well-vegetated/treed foothills, San Fernando Valley skyline and mountains), the view from this viewpoint represents a scenic vista. The mid- and upper levels of some of the buildings on the Project Site are visible just to the right of the tree in the center of the view.

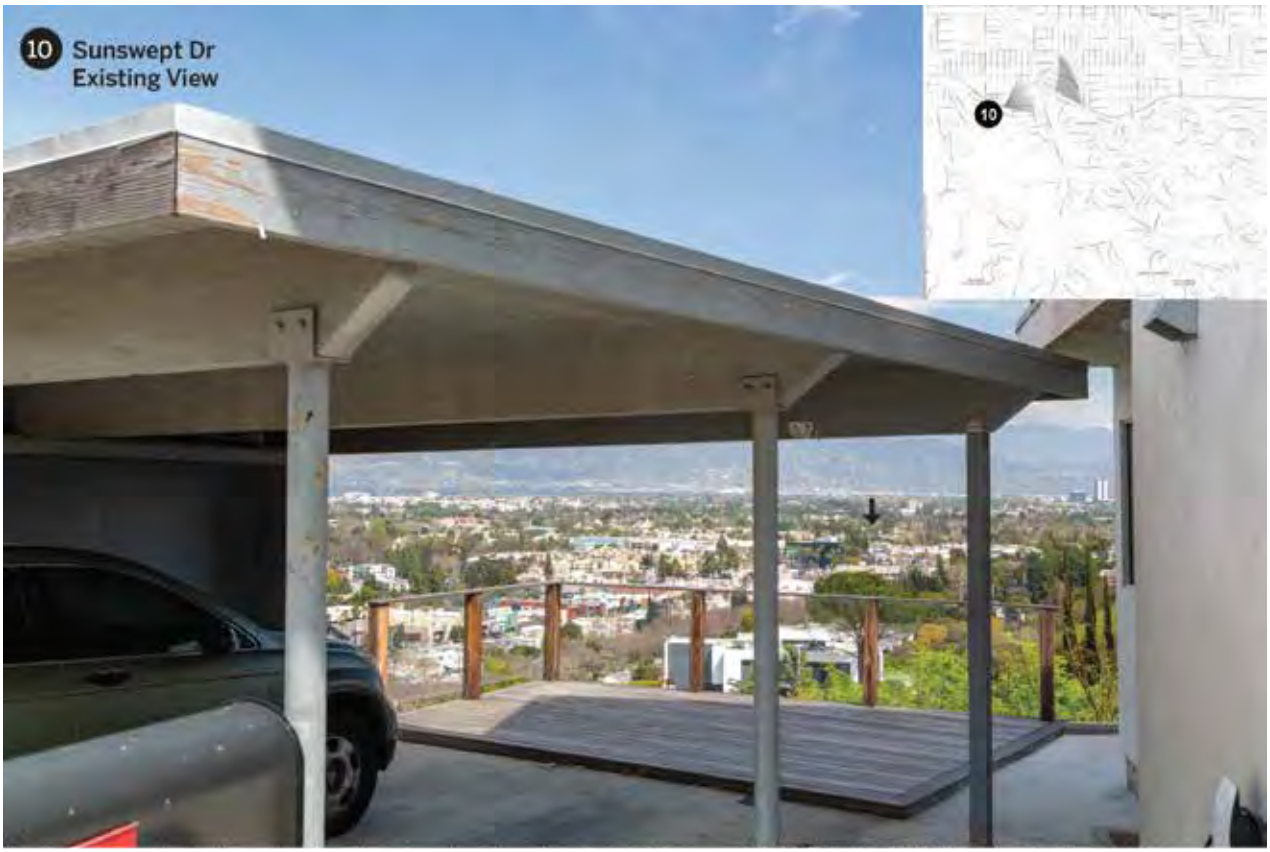
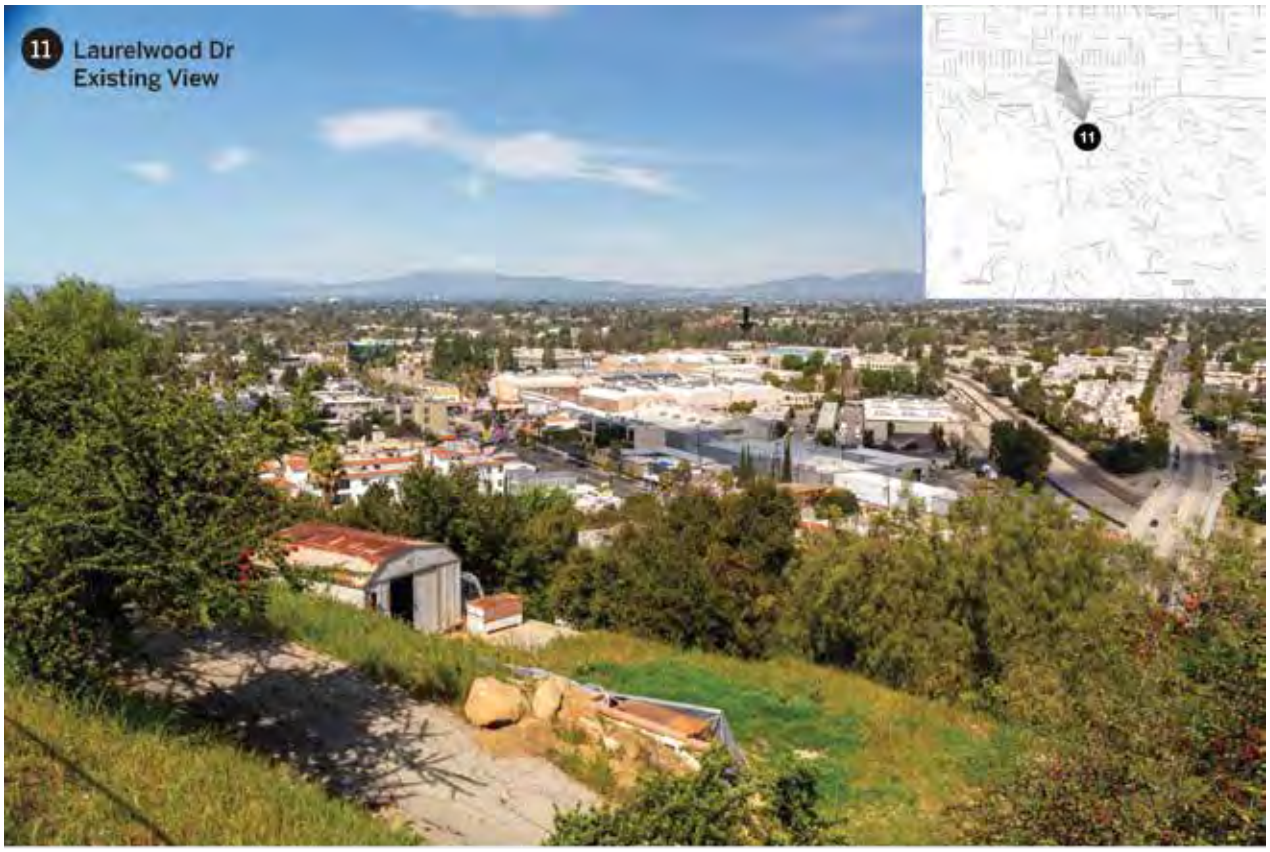


Figure IV.A-11
Viewpoint 10 - Existing and Proposed View from Sunswept Drive

Source: SOM, 2024.



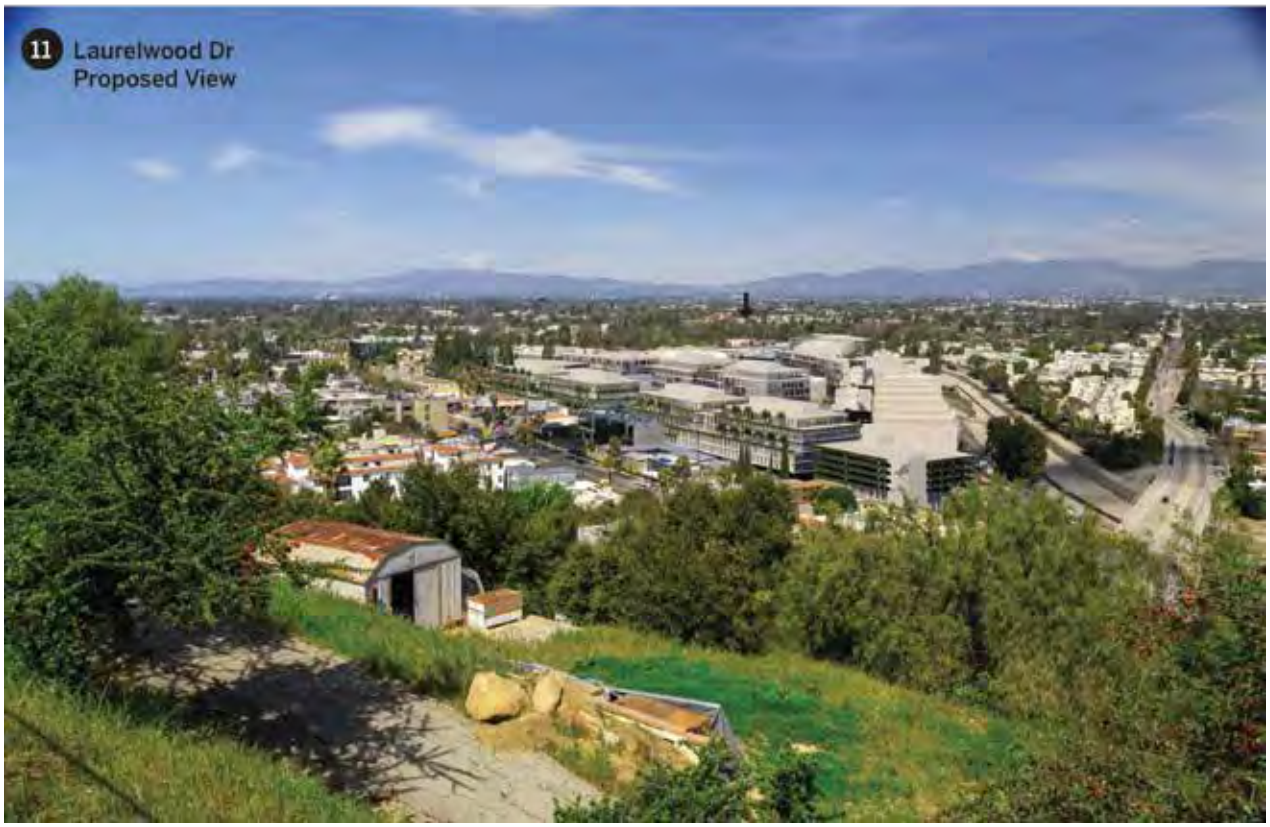


Figure IV.A-12
Viewpoint 11 - Existing and Proposed View from Laurelwood Drive

Source: SOM, 2024.

Figure IV.A-13
Viewpoint 12 - Existing and Proposed View from Laurelcrest Drive

Source: SOM, 2024.

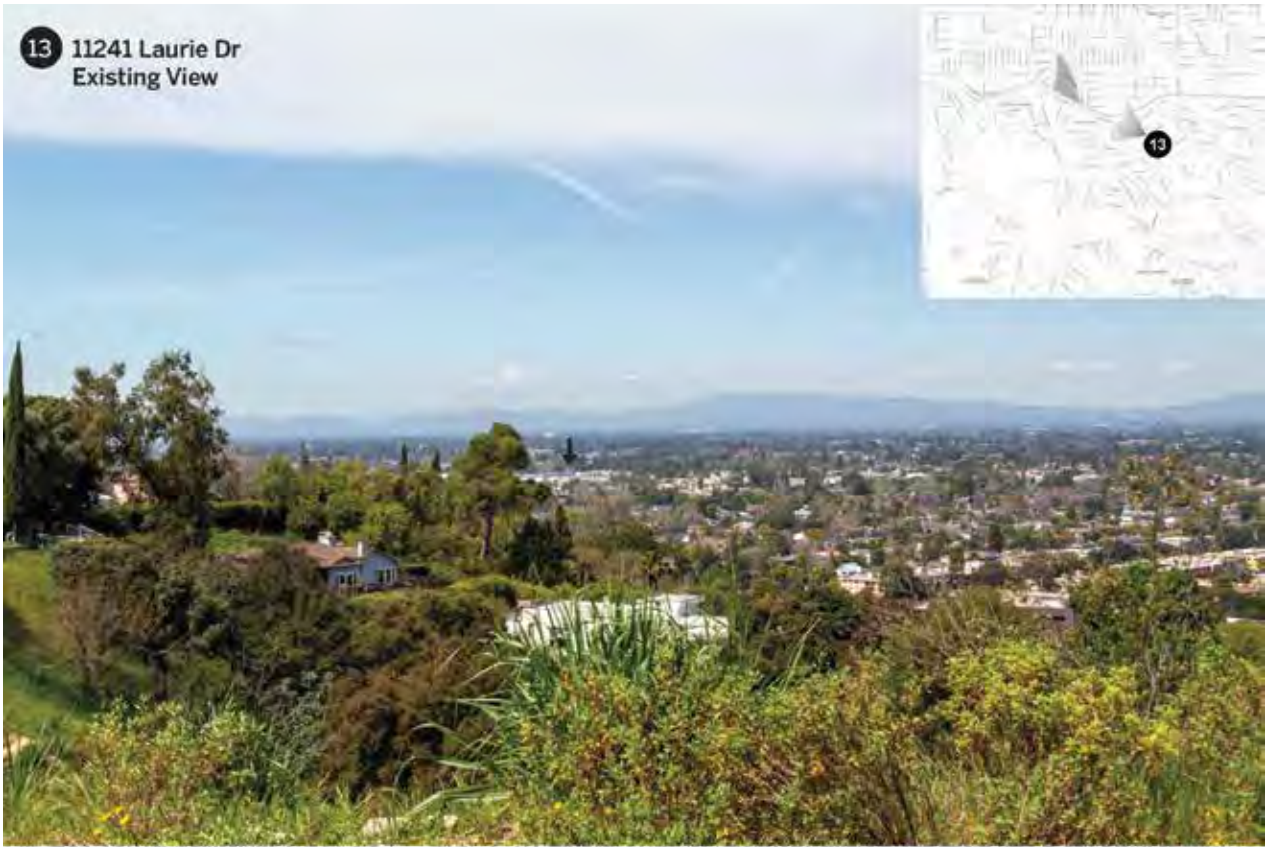


Figure IV.A-14
Viewpoint 13 - Existing and Proposed View from Laurie Drive

Source: SOM, 2024.

(2) Scenic Resources

As discussed above, scenic resources refer to natural or manmade features of high aesthetic quality, such as landscaping, natural trees (including heritage trees), landforms, historic buildings, and other structures with aesthetic value within a State scenic highway. As discussed above, the Project's potential impacts to scenic resources visible from a State Scenic Highway were fully evaluated in the Initial Study, included in Appendix A of this Draft EIR, and were demonstrated to be less than significant. Specifically, the closest officially designated State Scenic Highways to the Project Site are the segments of SR-2 located approximately 13 miles to the northeast of the Project Site and the segment of SR-27 located approximately 13 miles to the southwest of the Project Site.[18] The Project Site is not located within the viewshed of either of these segments due to both distance and topography.

(3) Scenic Quality

As discussed above, 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. As described above, in Section 2.a, Regulatory Framework, the City has numerous plans, policies and regulations that are relevant to the assessment of scenic quality.

As discussed above, the approximately 55-acre Project Site is located on relatively flat terrain on the floor of the San Fernando Valley within a fully developed area and includes concrete-lined segments of the Los Angeles River and Tujunga Wash. As shown in Figure IV.C-1 in Section IV.C, Biological Resources, of this Draft EIR, landscaping on the Project Site includes several groupings of primarily ornamental trees and ornamental landscaping, as well as a moderately-sized grouping of oak trees and two very small groupings of oak trees. In addition, as discussed above and described in detail in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures, as well as the potential Mack Sennett Historic District, which includes ten buildings, of which six are considered contributing buildings to the potential historic district. As discussed above, trees and historic resources represent scenic resources. Photographs depicting the visual quality of the Project Site visible from public locations are shown in Figure IV.A-15 through Figure IV.A-24 on pages IV.A-40 and IV.A-49.

[18] *California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed January 15, 2025.*

Radford Gate
Existing View

Radford Gate
Proposed View

Figure IV.A-15
Existing and Proposed View at Radford Gate

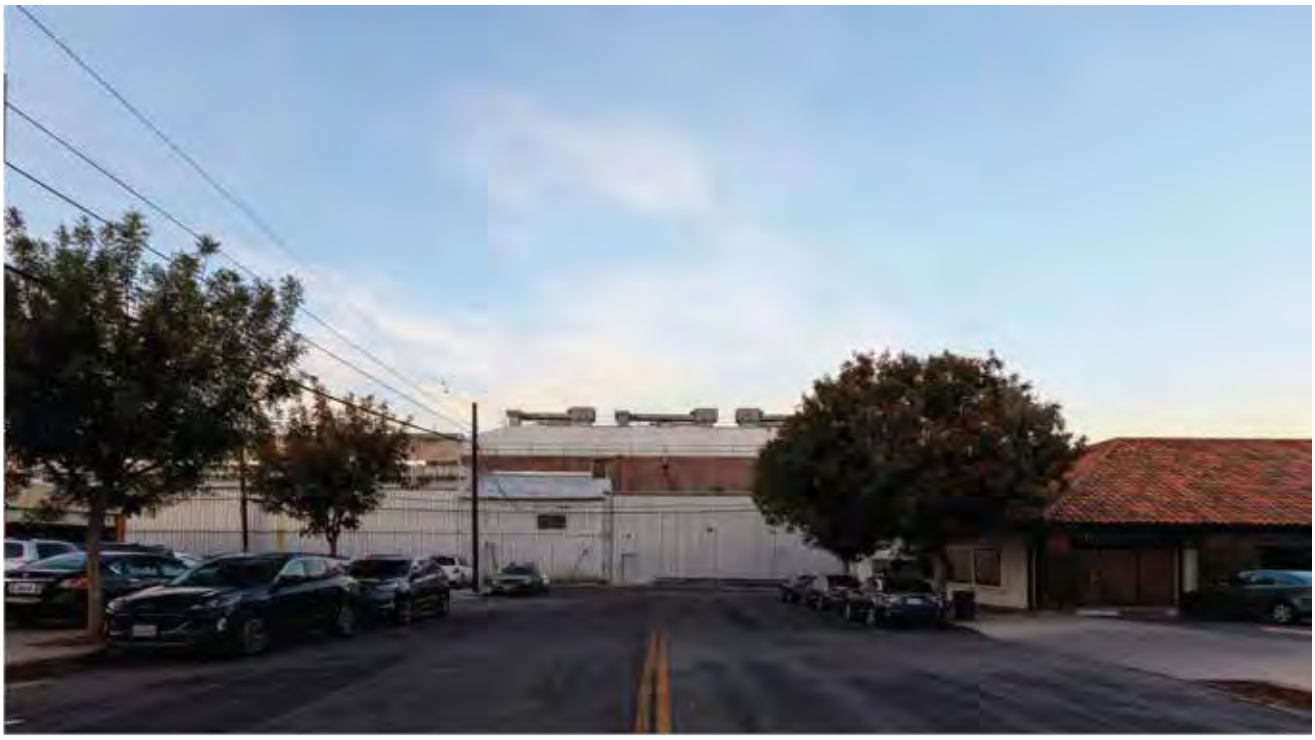
Source: SOM, 2024.

Radford at LA River
Existing View

Radford at LA River
Proposed View

Figure IV.A-16
Existing and Proposed View from Radford Avenue at LA River

Source: SOM, 2024.



Carpenter Gate
Existing View

Carpenter Gate
Proposed View

Figure IV.A-17
Existing and Proposed View at Carpenter Gate

Source: SOM, 2024.

Ventura at Radford
Existing View

Ventura at Radford
Proposed View

Figure IV.A-18
Existing and Proposed View from
Ventura Boulevard at Radford Avenue

Source: SOM, 2024.

Colfax Gate
Existing View

Colfax Gate
Proposed View

Figure IV.A-19
Existing and Proposed View at Colfax Gate

Source: SOM, 2024.

River and Tujunga Wash
Existing View

River and Tujunga Wash
Proposed View: Posters

Figure IV.A-20
Existing and Proposed View of LA River and Tujunga Wash
View 1 – With Poster Signage

Source: SOM, 2024.

River and Tujunga Wash
Existing View

River and Tujunga Wash
Proposed View: Murals

Figure IV.A-21
Existing and Proposed View of LA River and Tujunga Wash
View 1 - With Murals

Source: SOM, 2024.

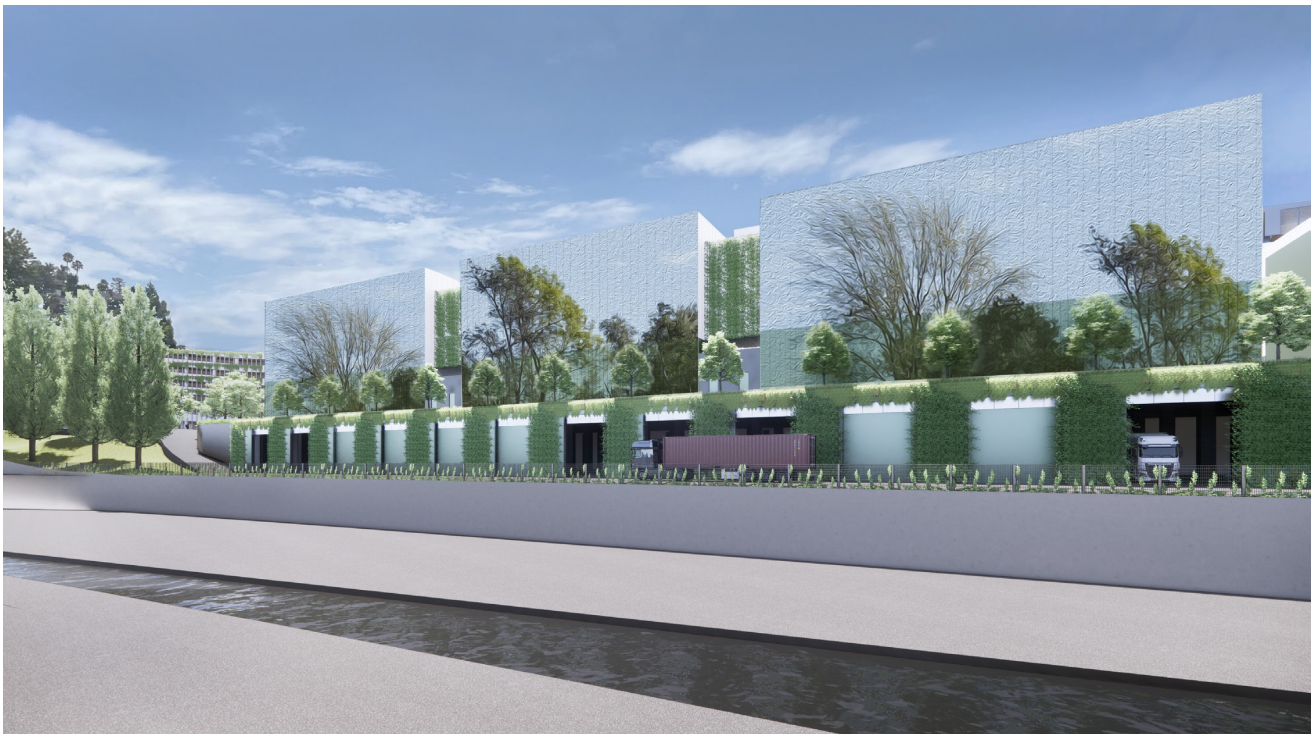
River and Tujunga Wash
Existing View

River and Tujunga Wash
Proposed View: Posters

Figure IV.A-22
Existing and Proposed View of LA River and Tujunga Wash
View 2 - With Poster Signage

Source: SOM, 2024.

River and Tujunga Wash
Existing View



River and Tujunga Wash
Proposed View: Murals

Figure IV.A-23
Existing and Proposed View of LA River and Tujunga Wash
View 2 - With Murals

Source: SOM, 2024.

Moorpark Bridge
Existing View

Moorpark Bridge
Proposed View

Figure IV.A-24
Existing and Proposed View – Moorpark Bridge

Source: SOM, 2024.

The Mobility Plan identifies three roadways within the Project vicinity as City-designated scenic highways, including Mulholland Drive, Laurel Canyon Boulevard, and Coldwater Canyon Avenue.[19] While the Project Site is visible from multiple Major Vista Points along Mulholland Drive, the Project Site is not located within the inner or outer corridors designated by the Mulholland Specific Plan and is, thus, not subject to the requirements of the Mulholland Specific Plan. Furthermore, the Project Site is not visible from the scenic-highway portions of Laurel Canyon Boulevard and Coldwater Canyon Avenue due to intervening topography, and because the Project Site is not located along the scenic highway portions of either of these streets, it is not subject to Mobility Plan requirements applicable to City-designated scenic highways for which a scenic parkway Specific Plan has not yet been adopted.

(4) Light and Glare

As discussed above, the Project Site is located in an urbanized area. As discussed in the Lighting Report, included in Appendix C.1 of this Draft EIR, the existing conditions surrounding the Project Site are best described as Lighting Zone 3, which includes areas of human activity (i.e., habitation, recreation, and/or work), where electric lighting may be continuous and is required for convenience at night. Existing sources of light within the Project Site include a wide range of lighting for safety, security, and use of the property. This includes building lighting, site lighting, film production lighting, illuminated signage, and vehicle headlights. Existing sources of light within the greater Project vicinity include building lighting, site lighting, vehicle headlights, streetlights, and signage lighting. As discussed in detail in the Lighting Report, Monitoring Sites and Internal Sites were selected to establish existing exterior light and glare levels.

(a) Monitoring Sites

Monitoring Site locations were selected for observation and field lighting measurements to evaluate the views to the Project from adjacent sensitive uses to determine the extent and intensity of existing light sources within and surrounding the Project Site. The Monitoring Sites are within the public right-of-way and adjacent to or closer than the nearest properties with sensitive uses surrounding the Project Site. These Monitoring Sites were used to determine the extent of existing, ambient lighting conditions and to evaluate the potential Project light trespass and glare impacts at off-site locations. Figure IV.A-25 on page IV.A-51 provides the locations of the Monitoring Sites. A description of these Monitoring Sites is provided below:

[19] *City of Los Angeles, Mobility Plan 2035, adopted September 7, 2016, Map A3, Citywide General Plan Circulation System—West Subarea, and the Inventory of Designated Scenic Highways table in Appendix B.*

Figure IV.A-25
Monitoring Sites Used in Lighting Analysis

Source: FKA, 2024.

- M-E1: Monitoring Site M-E1 is located at 4161 Colfax Avenue (Studio Village), east of the Project Site. The Monitoring Site is located adjacent to the Project Site property line and approximately 170 feet from the Project boundary.[20]

- M-E2: Monitoring Site M-E2 is located at 4114 Colfax Avenue, southeast of the Project Site. The Monitoring Site is located approximately 107 feet from the Project Site property line and approximately 205 feet from the Project boundary.

- M-NE1: Monitoring Site M-NE1 is located at 11830 Moorpark Street (Studio Village Apartments), northeast of the Project Site. The Monitoring Site is located adjacent to the Project Site property line and approximately 100 feet from the Project boundary.

- M-NE2: Monitoring Site M-NE2 is located at 11798 Moorpark Street (Studio Village Apartments), east/northeast of the Project Site. The Monitoring Site is located adjacent to the Project Site property line and approximately 100 feet from the Project boundary.

- M-NE3: Monitoring Site M-NE3 is located at the corner of Radford Avenue and Moorpark Street, north of the Project Site. The Monitoring Site is located adjacent to the Project Site property line and approximately 100 feet from the Project boundary.

- M-S1: Monitoring Site M-S1 is located at 3965 Carpenter Avenue, south of the Project Site. The distance to the Project Site property line is approximately 385 feet.

- M-W1: Monitoring Site M-W1 is located at the northwestern corner of Radford Avenue and Valleyheart Drive, west of the Project Site. The distance to the Project Site property line is approximately 50 feet.

- M-W2: Monitoring Site M-W2 is located approximately 55 feet north of the northwestern corner of Radford Avenue and Hoffman Street, west of the Project Site. The distance to the Project Site property line is approximately 90 feet.

- M-NW1: Monitoring Site M-NW1 is located at 4243 Radford Avenue, west/northwest of the Project Site. The distance to the Project Site property line is approximately 75 feet.

Table IV.A-1 on page IV.A-53 provides existing illuminance levels at the Monitoring Sites. As discussed in the Lighting Report, measured illuminance greater than 2.0 fc is

[20] *Portions of the Los Angeles River and Tujunga Wash are contained within the eastern portion of the Project Site in dedicated easement areas. Thus, the Project Site property line includes these areas. The Project Site boundary is the internal edge where the Project components are developed that is adjacent to the Los Angeles River and Tujunga Wash easement areas. Light trespass is analyzed at the nearest residentially zoned property line.*

Table IV.A-1
Measured Existing Illuminance (fc) at Monitoring Sites

Monitoring Site	Existing Illuminance (fc)		Evaluation
	Horizontal	Vertical	
M-E1	0.09	0.03	Low horizontal, Low vertical illuminance.
M-E2	0.11	0.16	Low horizontal, Low vertical illuminance.
M-NE1	0.10	0.04	Low horizontal, Low vertical illuminance.
M-NE2	0.06	0.05	Low horizontal, Low vertical illuminance.
M-NE3	0.55	0.06	Low horizontal, Low vertical illuminance.
M-S1	0.18	0.18	Low horizontal, Low vertical illuminance.
M-W1	0.01	0.05	Low horizontal, Low vertical illuminance.
M-W2	0.10	0.08	Low horizontal, Low vertical illuminance.
M-NW1	0.39	0.25	Low horizontal, Low vertical illuminance.

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

considered High illuminance, measured illuminance less than 2.0 fc and greater than 1.0 fc is considered Medium illuminance, and measured illuminance less than 1.0 fc is considered Low illuminance. As shown therein, the measured horizontal illuminance from the Monitoring Sites ranges from a high of 0.55 fc at M-NE3 to a low of 0.01 fc at M-W1, and the measured vertical illuminance ranges from a high of 0.25 fc at M-NW1 to a low of 0.03 fc at M-E1. Thus, all Monitoring Sites have low horizontal and vertical illuminance.

With regard to luminance, Table IV.A-2 on page IV.A-54 provides the existing average and existing maximum luminance levels at the Monitoring Sites. The Monitoring Sites represent a wide range of light conditions from areas with low brightness to high brightness areas with many bright visible surfaces and light sources. The measured luminance recorded at the Monitoring Sites within view of the Project Site includes prominent, high brightness light sources and illuminated surfaces, such as streetlights, illuminated signs, and exterior building lighting, as well as lower brightness surfaces, such as unilluminated walls. Luminance below 10 cd/m^2 is considered Low luminance; luminance greater than 10 cd/m^2 and less than 300 cd/m^2 is considered Medium luminance; and luminance greater than 300 cd/m^2 is considered High luminance. As shown in Table IV.A-2, the highest average luminance was recorded at Monitoring Site M-NW1 at approximately 409 cd/m^2, while the lowest average luminance was measured at Monitoring Site M-NE3 at 7 cd/m^2. In addition, the highest measured maximum luminance was recorded at Monitoring Site M-NW1 with 5,773 cd/m^2, while the lowest maximum luminance was measured at Monitoring Site M-NE3 at approximately 144 cd/m^2. High maximum luminance levels were identified at seven of the nine Monitoring Sites.

Table IV.A-2
Measured Existing Luminance (cd/m^2) at Monitoring Sites

Monitoring Site	Existing Luminance (cd/m^2)		Contrast Ratio (max/ average)	Evaluation
	Average	Maximum		
M-E1	73.8	1,524	20.7	Medium average luminance, High maximum luminance, Medium contrast
M-E2	289.2	3,715	13.1	Medium average luminance, High maximum luminance, Medium contrast
M-NE1	40.9	603.9	14.8	Medium average luminance, High maximum luminance, Medium contrast
M-NE2	34.2	162	4.7	Medium average luminance, Medium contrast
M-NE3	7.0	143.3	20.6	Low average luminance, Medium contrast
M-S1	144.5	2752	19.0	Medium average luminance, High maximum luminance, Medium contrast
M-W1	37.8	495.0	13.1	Medium average luminance, High maximum luminance, Medium contrast
M-W2	89.6	1,387	15.5	Medium average luminance, High maximum luminance, Medium contrast
M-NW1	408.6	5,773	14.1	High average luminance, High maximum luminance, Medium contrast

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

With regard to glare (contrast), Table IV.A-2 also provides the existing contrast ratios at the Monitoring Sites. As shown therein, the calculated contrast ratio (maximum luminance/ average luminance) varies from a Low of 4.7 to 1 at Monitoring Site M-NE2 to a High of 20.7 to 1 at Monitoring Site M-E1. The calculated existing contrast ratio at eight Monitoring Site locations represents Medium contrast (less than 30 to 1, and greater than 10 to 1).

(b) Internal Sites

As shown in Figure IV.A-25 on page IV.A-51, four Internal Sites within the Project Site boundary and adjacent to the RIO boundary were used to measure the extent of existing exterior lighting levels illuminance and glare, including building lighting, site lighting, and film production lighting within the Project Site. These Internal Sites are as follows:

- I-1: Internal Site I-1 is located at the north surface parking lot in the northeastern portion of the Project Site adjacent to the Los Angeles River.

- I-2: Internal Site I-2 is located in the southwestern portion of the North Lot adjacent to the north side of the Los Angeles River that traverses the Project Site.

- I-3: Internal Site I-3 is located in the center of the Project Site adjacent to the south side of the Los Angeles River that traverses the Project Site.

- I-4: Internal Site I-4 is located near the southeastern portion of the South Lot adjacent to the west side of the Los Angeles River.

The existing lighting at the Internal Sites includes a wide range of lighting for the studio use of the Project Site, such as exterior building and site lighting for safety, security, film production, events, and other existing uses of the property. The Internal Sites are adjacent to these existing studio uses with existing lighting and illuminated signs and adjacent to the Los Angeles River/Tujunga Wash. Lighting within the Project Site contributes to the ambient lighting conditions at all Internal Sites.

Table IV.A-3 on page IV.A-56 summarizes the measured existing illuminance at the Internal Sites. Since the Los Angeles River and Tujunga Wash are both within the Project Site boundary, the existing lighting is measured at the closest portion of the Los Angeles River and Tujunga Wash along the Project Site boundary. The measured existing horizontal and vertical illuminance at all Internal Sites currently exceed the RIO standard of 0.2 fc. The maximum measured existing vertical illuminance is 7.88 fc at Internal Site I-1, and the maximum measured existing horizontal illuminance is 3.26 fc at Internal Site I-3. The RIO Ordinance (Ordinance No. 183,145) was enacted after this existing lighting was permitted and installed. The RIO Ordinance identifies the maximum illuminance at the “site boundary” but does not take into account the unique nature and boundaries of the Project Site (i.e., with portions of the Los Angeles River and Tujunga Wash being contained within the Project Site in dedicated easement areas). The RIO Ordinance does not account for this unique circumstance. Rather, the drafting of the RIO Ordinance assumed that the river portions are separate legal parcels owned by the government, separated from private property.

Table IV.A-3
Measured Illuminance (fc) at Internal Sites

Internal Site	Existing Illuminance (fc)		Evaluation
	Horizontal	Vertical	
I-1	2.35	7.88	Exceeds RIO standard of 0.2 fc
I-2	1.32	1.80	Exceeds RIO standard of 0.2 fc
I-3	3.26	2.98	Exceeds RIO standard of 0.2 fc
I-4	0.61	0.87	Exceeds RIO standard of 0.2 fc

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G (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 within a state scenic highway; or

Threshold (c): In non-urbanized areas, substantially degrade the exiting visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality;[21] or

[21] *Pursuant to Public Resources Code Sections 21060 and 21071, for purposes of CEQA an "urbanized area" means "(a) an incorporated city that meets either of the following criteria: (1) has a population of at least 100,000 persons, or (2) has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." CEQA Guidelines Section 15191(m) similarly defines an urbanized area as "[a]n incorporated city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons." The Project Site is located in the City of Los Angeles which is an incorporated city with a population of greater than*

(Footnote continued on next page)

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

As outlined below, the analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G Threshold questions.

(a) Scenic Vistas

A significant impact would occur if the Project would have a substantial adverse effect on a publicly available scenic vista. The analysis of this impact category includes a consideration of the following factors set forth in the Thresholds Guide, as appropriate:

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

(b) Scenic Quality

According to the Thresholds Guide, a significant impact would occur under Threshold (c) if a project were to substantially degrade the existing visual character or quality of the site and its surroundings. However, the City's Thresholds Guide dates from 2006 before there were two forms of Threshold (c) as currently set forth in CEQA Guidelines Appendix G, one applicable to urbanized areas and one applicable to rural areas. As discussed above, the Project Site is located within an urbanized area. Thus, consistent with the more recent threshold within Appendix G of the CEQA Guidelines, impacts would be significant if the Project would conflict with zoning and other applicable regulations regarding scenic quality.

(c) Light and Glare

Light and glare impacts are typically associated with outdoor artificial light (including from motor vehicles) and glare associated with high contrast of light as discussed above. Glare may also be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may

3.8 million people. Thus, the City has determined that the form of Threshold (c) applicable to urbanized areas is the most appropriate threshold for this analysis.

interfere with the safe operation of a motor vehicle on adjacent streets. Accordingly, the analysis of this impact category will include a consideration of the following factors set forth in the Thresholds Guide:

- 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.

Based on these factors, the CEQA Guidelines, and the lighting regulations discussed above, the Project would create a significant impact with regard to artificial light and glare if:

- The Project illuminance associated with stationary lighting is greater than 2.0 fc at the boundary of a sensitive use property such as a residence or hotel where sleep is expected;
- The Project Sign lighting illuminance is greater than 3.0 fc at a residentially zoned property boundary;
- Project signs create glare with new high contrast conditions, with luminance greater than 300 cd/m^2 at night and contrast ratio greater than 30:1, visible from a field of view from a residential property; or
- The Project creates glare effects on drivers of motor vehicles by exceeding the maximum luminance standards established by CVC Section 21466.5, where maximum brightness of the Project Sign within 10 degrees from the driver's normal field of view is greater than 1,000 times the minimum measured brightness in the driver's field of view, or when the minimum measured brightness in the field of view is 10 fL or less, the measured brightness of the light source in fL exceeds 500 plus 100 times the angle, in degrees, between the driver's field of view and the light source.

(d) Shade and Shadow

Based on City guidance, a Project would result in significant impacts associated with shading if it would shade public gathering spaces for more than 90 minutes between the hours of 10:00 A.M. and 2:00 P.M. during the winter solstice.

b. Methodology

(1) Scenic Vistas

The assessment of impacts to a scenic vista focuses on the anticipated changes to existing scenic vistas available from the representative public views in the vicinity of the Project

Site. Scenic vistas were identified through review of the relevant plans, including the Community Plan, numerous field visits to the Project Site vicinity, and review of satellite imagery available on-line. As discussed in Subsection 2.B, Existing Conditions, above, the Project Site is visible from a number of public viewpoints that include scenic vistas. To evaluate the impacts of the Project on the existing scenic vistas available from these viewpoints, visual simulations of the proposed development have been prepared. These visual simulations were then compared to the existing views without the Project from each of these viewpoints to identify potential impacts of the Project on the existing scenic vistas. Factors involved in the comparison include the extent to which the proposed development would make up the field of view from each of the viewpoints and the extent to which the scenic vistas from each of the viewpoints would be impacted (i.e., substantially degraded or blocked).

(2) Scenic Quality

As discussed previously, the Project Site is located in the City of Los Angeles, which meets the definition of an urbanized area.[22] As such, and in accordance with Threshold (c) of State CEQA Guidelines Appendix G, the analysis focuses on whether the Project would conflict with zoning and other regulations governing scenic quality. The determination of conflicts with applicable regulations governing scenic quality is based on a description of Project characteristics (and similarities with existing development) and review of the previously identified applicable City plans and regulations pertaining to scenic quality. These include the City's General Plan (including the Framework Element, the Conservation Element and the Community Plan), the RIO, the LAMC, and the Citywide Design Guidelines.

CEQA Guidelines Section 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. A project is considered in conformance if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, State law does not require an exact match between a project and the applicable general plan. Rather, "consistency" suggests compatibility with the overall objectives, policies, general land uses, and program specified in the plan or regulation.

(3) Light and Glare

The analysis of light and glare is based on the Lighting Report, included in Appendix C.1 of this Draft EIR. The Lighting Report evaluates sources of artificial light and glare from the

[22] *Consistent with CEQA Section 21071 and per CEQA Guidelines Section 15191(m), an urbanized area is defined as either of the following: (1) an incorporated city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons; or (2) an unincorporated area that meets certain criteria set forth in Section 15191(m)(2).*

Project, including exterior building lighting, outdoor security and filming lighting, and other point and mobile sources. As part of the Lighting Report, detailed site surveys of the Project Site and surrounding properties located at a distance near enough to potentially receive substantial light trespass or glare were conducted. Representative Monitoring Sites and Internal Sites were selected, and detailed modeling at sensitive use property locations, where there may have been a potential for light trespass and or glare, was completed. Monitoring Sites and Internal Sites were selected based on visibility, proximity to the Project Site, and proximity to the Los Angeles River/Tujunga Wash.

Existing conditions lighting observations were conducted following recommended practice procedures defined by the IESNA. Field illuminance and luminance measurements were conducted to accurately document all existing incident and visible light at each Monitoring Site location (i.e., representative adjacent light-sensitive use) and at Internal Sites within the Project Site.

Illuminance was measured in footcandles or lux. The illuminance was measured perpendicular to the source of light, toward the source of light, at the property line, or at the location where light would cause an issue, such as a residential window or balcony. Illuminance was calculated through the illumination modeling software program AGI32 at virtual vertical surfaces located at the adjacent sensitive use property line or the Project Site property line. Signs were evaluated with a sign configuration at the maximum permissible light intensity within the limits defined by the proposed Specific Plan. To provide a conservative analysis, all external Project signs were analyzed as operating simultaneously at a maximum luminance of 100 cd/m^2, all white, at night, and all internal Project signs were analyzed as operating simultaneously at a maximum luminance of 300 cd/m^2, all white, at night. The Project signs would not operate in an all-white mode in practice. However, the analysis with all Project signs operating in all-white mode presents a conservative (maximum) evaluation of the Project signs' potential for off-site light trespass illuminance. The illuminance calculations for stationary lighting were compared with a threshold of 2.0 fc maximum at the nearest property with a residential use or other sensitive use properties, and the illuminance calculations for signs were compared with a 3.0 fc maximum at the nearest residentially zoned property.

Glare from the Project was evaluated at adjacent sensitive uses and for drivers on adjacent streets. The glare from the Project at sensitive use properties was determined by the contrast ratio, which equals the maximum source of luminance divided by the measured average existing luminance within the visual field at the Monitoring Sites as identified in the field survey of existing conditions. Contrast ratios greater than 30:1 were considered "High" and potential glare conditions.

Light from the Project and the effect on drivers was analyzed with respect to compliance with the CVC requirements for both night and day conditions at adjacent roadways described

in Section 2a, Regulatory Framework, above. The lighting impact to a driver's visibility from the Project signs was evaluated based on the center line of the drivers' field of view and at angles wider than the center line of the drivers' field of view. Bright sources within the driver's field of view, from the center line of the roadway to angles up to 90 degrees from the center line of the roadway, may create glare if the light source is brighter than the limits established by the CVC.

The roadway glare analysis within the Lighting Report evaluated the maximum Project sign luminance during night, twilight, and day with respect to the most stringent requirements of the CVC to determine if the Project introduces a source of substantial glare to drivers. The maximum Project luminance at night and during twilight includes the Project signs operating at the maximum night luminance of 300 cd/m2 in all white mode, which as described above represents a conservative assumption. In accordance with the project design features presented below, the maximum Project sign luminance during the day includes the Project signs operating at the maximum daytime luminance of 6,000 cd/m2 and in all white mode to provide a conservative analysis.

The most stringent condition identified within CVC Section 21466.5 states: "when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lamberts shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source." Thus, a conservative evaluation occurs where the Project signs are visible within the center line of the driver's field of view, the angle noted above within the field of view is 0, the surrounding surface luminance is less than 10 fL, and, as such, the maximum allowable luminance is 500 fL. Therefore, the most conservative condition at night or at twilight evaluates the Project signs' maximum luminance against a maximum luminance threshold of 500 fL.

c. Project Design Features

The following Project Design Features (PDFs) related to aesthetics will be implemented as part of construction and operation of the Project:

(1) Construction

Project Design Feature AES-PDF-1: Temporary 10-foot-tall, opaque construction fencing will be installed around construction sites that are visible from the adjacent public streets, Los Angeles River, and Tujunga Wash. Any graffiti that may appear on this construction fencing will be removed on a regular basis.

Project Design Feature AES-PDF-2: Outdoor lighting will be directed away from adjacent residential properties and the public right-of-way. However,

construction lighting will not be so limited as to compromise the safety of construction workers.

(2) Operation

Project Design Feature AES-PDF-3: All landscaped areas will be maintained in accordance with an approved landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.

Project Design Feature AES-PDF-4: Stationary light sources will be designed to produce no more than 0.74 fc of illumination as measured at the Project Site property line or at the centerline of the adjacent public right-of-way.

Project Design Feature AES-PDF-5: All exterior stationary lights located within 50 feet of the Project Site boundary[23] will not exceed 30 feet in height, will be fully shielded, and have a Backlight, Uplight, and Glare (BUG) rating of B=0 U=0 G=0 to reduce glare, uplight, and backlight onto the adjacent residential properties.

Project Design Feature AES-PDF-6: All exterior stationary lights located within 50 feet of the Project Site boundary will have a type II distribution.[24]

Project Design Feature AES-PDF-7: Parking structure rooftop lighting will not exceed 20 feet in mounting height and will use horizontally mounted, rectilinear-type, sharp cut-off fixtures shielded in such a manner that the source cannot be viewed from residentially zoned properties outside of the Project Site. The source will not exceed 9,500 lumens and will be located no less than 40 feet from the building perimeter and/or below the height of the roof parapet.

Project Design Feature AES-PDF-8: All exterior building and stationary site lighting will not exceed 2,500 lumens within 50 feet of the Project Site boundary. All exterior building and site lighting located beyond 50 feet of the Project Site boundary will not exceed 20,000 lumens.

Project Design Feature AES-PDF-9: Project signs located within 100 feet from Project property line and/or Project boundary will not exceed the nighttime luminance of 100 candelas per meter squared (cd/m^2) at night from sunset until sunrise. Exterior Project signs will be illuminated by fully shielded light fixtures mounted at the top and bottom of the signs. Digital displays

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[23] *Portions of the Los Angeles River and Tujunga Wash are contained within the eastern portion of the Project Site in dedicated easement areas. Thus, the Project Site property line includes these areas. The Project Site boundary is the internal edge where the Project components are developed that is adjacent to the Los Angeles River and Tujunga Wash easement areas.*

[24] *Distribution types are terms used to define the pattern of light disperse from a luminaire. The type II distribution is used for wide walkways, ramps, and any other long, narrow roadways. This type is meant for illuminating larger areas and is usually located adjacent to the roadside.*

will not be permitted on the Project exterior (i.e., digital displays will only be permitted in the Site Interior).

Project Design Feature AES-PDF-10: Project signs located beyond 100 feet from the Project property line for the western and southern portion of the Project Site and the Project boundary for the eastern portion of the Project Site will not exceed the nighttime luminance of 300 cd/m^2 at night from sunset until sunrise. No interior digital Project signs will be allowed within 100 feet from the Project property line to the west and south and 100 feet from the Project boundary to the east and north.

Project Design Feature AES-PDF-11: Mural walls will be illuminated with fully shielded floodlights located at the top of the walls shining down. Mural/art walls surface brightness will not exceed 50 cd/m^2.

Project Design Feature AES-PDF-12: Project signs will not exceed the daytime luminance of 6,000 cd/m^2 for all signs during the day, from 45 minutes after sunrise until 45 minutes prior to sunset.

Project Design Feature AES-PDF-13: Project signs luminance will transition smoothly from daytime luminance to nighttime luminance and vice versa over a period of no less than 45 minutes.

Project Design Feature AES-PDF-14: Illuminated signs that have the capacity to exceed the maximum luminance permitted at night (300 cd/m^2) will include an electronic control system to reduce sign luminance to the maximum nighttime brightness (300 cd/m^2) at any time when ambient sunlight is less than 100 fc.

Project Design Feature AES-PDF-15: For internally illuminated signs, the maximum allowed lighting power will not exceed the product of the illuminated sign area and 12 watts per square foot.

Project Design Feature AES-PDF-16: All outdoor Project signs will be controlled with a photocontrol in addition to an automatic time-switch control, or an astronomical time-switch control.

Project Design Feature AES-PDF-17: All outdoor signs that are illuminated at night and for more than 1 hour during daylight hours will be controlled with a dimmer that provides the ability to automatically reduce Project signs power by a minimum of 65 percent during nighttime hours.

Project Design Feature AES-PDF-18: The sign area facing the sensitive use property (motel use), which directly abuts the public alley to the south of the Project Site, will not exceed 270 square feet to comply with the Code-required 3 footcandle (fc) threshold. This limitation shall remain in place as long as the sensitive use (motel use) exists to the south of the Project. If the adjacent sensitive use is removed in the future, this Project Design Feature can be eliminated.

Project Design Feature AES-PDF-19: All lighting for above-grade parking structures and exterior building terraces will be designed to prevent light spill from

any building or parking structure roof deck or terrace, or from any open elevations of any building or parking structure within 50 feet from the Project Site.

Refer to Section II, Project Description, of this Draft EIR for a description and representative figures of the Project, including descriptions of the proposed land uses and conceptual site plan, renderings etc.

d. Analysis of Project Impacts

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

(1) Impact Analysis

As discussed in Section 2.b, Existing Conditions, above, the Project Site is visible f rom several locations to the south of the Project Site within the Santa Monica Mountains, and the degree of visibility is dependent on the distance of the viewpoint from the Project Site, as well as intervening topography. Figure IV.A-6 through Figure IV.A-10 on pages IV.A-28 through IV.A-33 include visual simulations that show the views of the Project from each of the 11 representative viewpoints where the Project Site is visible. These views with implementation of the Project are described below. The text in the brackets in the name of each viewpoint, where such brackets are provided, identifies whether the viewpoint is a City-designated Scenic View Site in the Community Plan [CP] and/or a City-designated Major Vista Point in the Mulholland Specific Plan [SP].

- Viewpoint 3 (Unnamed Mulholland Dr. Overlook 01 [CP]): As shown in Figure IV.A-4 on page IV.A-26, Viewpoint 3 is an elevated northerly public view approximately 1.59 miles to the south of the Project Site. The mid- and upper levels of many of the buildings on the Project Site are currently visible near the center of the view close to where the foothills transition to the valley floor.

  As shown in Figure IV.A-4, the new buildings would be slightly more visible from this viewpoint under the Project due to the increased building footprint and height. However, there would be no change in the visibility of the scenic resources in this view, including the well-vegetated foothills of the Santa Monica Mountains, the San Fernando Valley skyline, and the San Gabriel and Santa Susana Mountains. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. As such, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 4 (Autry Overlook—8601 Mulholland Dr. [SP]): As shown in Figure IV.A-5 on page IV.A-27, Viewpoint 4 is an elevated northerly public view located approximately 1.30 miles to the south of the Project Site. The upper levels of some

of the buildings on the Project Site are currently visible near the horizontal center at the transition between the foothills and the valley floor from this viewpoint.

As shown in Figure IV.A-5 on page IV.A-27, the new buildings would be slightly more visible from this viewpoint under the Project due to the increased building footprint and height. However, there would be no change in the visibility of scenic resources from this viewpoint, including the well-landscaped foothills of the Santa Monica Mountains, the San Fernando Valley skyline, and the Santa Susana Mountains. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. As such, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 5 (Dead Man Overlook—8591 Mulholland Dr. [SP]): As shown in Figure IV.A-6 on page IV.A-28, Viewpoint 5 is an elevated expansive northerly public view located approximately 1.25 miles to the south of the Project Site. As shown therein, the upper levels of some of the buildings on the Project Site are currently visible near the horizontal center at the transition between the foothills and the valley floor from this viewpoint.

  As shown in Figure IV.A-6, the new buildings would be slightly more visible from this viewpoint under the Project due to the increased building footprint and height. However, there would be no change in the visibility of the foothills, or the Santa Susana Mountains from this viewpoint under the Project. In addition, there would be minimal reduction in the visibility of San Fernando Valley skyline. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 6 (Nancy Hoover Pohl Overlook—8401 Mulholland Dr. [SP]): As shown in Figure IV.A-7 on page IV.A-29, Viewpoint 6 is an elevated expansive northerly public view located approximately 1.35 miles to the south of the Project Site. The tops of some of the existing on-site buildings are currently barely visible in the center of the view over a high point in the foothills at the transition between the foothills and the valley floor from this viewpoint.

  As shown in Figure IV.A-7, the new buildings would generally not appear any different from this viewpoint under the Project than under existing conditions due to a high point in the foreground that blocks most of the view of the Project Site. There would be no change in the visibility of scenic resources, including the Sant Monica foothills, the San Fernando Valley skyline, and the Santa Susana Mountains from this viewpoint under the Project. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 7 (Universal City Overlook—7701 Mulholland Dr. [CP/SP]): As shown in Figure IV.A-8 on page IV.A-31, Viewpoint 7 is an elevated expansive northwesterly public view located approximately 1.60 miles to the southeast of the Project Site.

The Project Site is currently visible on the left side of the view shortly after the transition of the view from the foothills to the valley floor.

As shown in Figure IV.A-8 on page IV.A-31, the new buildings would be slightly more visible from this viewpoint under the Project due to the greater amount of square footage. However, most of the increase would be associated with the building footprint rather than associated with building height. In addition, there would be no change in the visibility of the foothills, the San Fernando Valley skyline, or the Santa Susana Mountains from this viewpoint under the Project. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 8 (Wilacre Trail #1): As shown in Figure IV.A-9 on page IV.A-32, Viewpoint 8 is an elevated expansive northeasterly public view located on a public trail approximately 0.85 miles to the southwest of the Project Site. The Project Site is currently visible on the right side of the view shortly after the transition from the foothills to the valley floor.

  As shown in Figure IV.A-9, the new buildings would be visible from this viewpoint under the Project due to the increased building footprint and height. However, there would be no change in the visibility of the foothills and the Santa Susana and San Gabriel Mountains. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 9 (Wilacre Trail #2): As shown in Figure IV.A-10 on page IV.A-33, Viewpoint 9 is an elevated northeasterly public view located along a public trail approximately 0.65 miles to the south of the Project Site. The Project Site is publicly visible on the right side of the view (to the east) shortly after the transition from the foothills to the valley floor.

  As shown in Figure IV.A-10, the new buildings would be visible from this viewpoint under the Project due to the increased building footprint and building height. However, there would be no change in the visibility of the foothills, a small and limited reduction in the visibility of the San Fernando Valley skyline, and no change in the visibility of the Santa Susana and San Gabriel Mountains from this viewpoint under the Project. In addition, the majority of the valley floor would continue to be visible behind the buildings, and the buildings would not project up and into the views of the mountains beyond. Furthermore, the overall height and width of the view available from this viewpoint, which is already partially constrained by trees on the right side of the view, would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 10 (Sunswept Drive): As shown in Figure IV.A-11 on page IV.A-35, Viewpoint 10 is an elevated northeasterly partial public view located approximately 0.73 miles to the southwest of the Project Site. Due to fencing, topography and

existing development along Sunswept Drive, public views of the Project Site from Sunswept Drive are currently limited. The Project Site is visible on the right side of the view (to the east) shortly after the transition from the foothills to the valley floor.

As shown in Figure IV.A-11 on page IV.A-35, the upper portions of the new buildings would be visible from this viewpoint under the Project due to the increased building footprint and building height. However, there would be no change in the visibility of the foothills, a small and limited reduction in the visibility of the San Fernando Valley skyline, and no change in the visibility of the Santa Susana and San Gabriel Mountains from this viewpoint under the Project. Most importantly, while the heights of the proposed buildings would project above the valley floor from this viewpoint, the majority of the valley floor would continue to be visible behind the buildings, and the buildings would not project up and into the views of the mountains beyond. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 11 (Laurelwood Dr.): As shown in Figure IV.A-12 on page IV.A-36, Viewpoint 11 is an elevated northwesterly public view located approximately 0.15 miles to the southeast of the Project Site on Laurelwood Drive. Due to vegetation, fencing and existing development along Laurelwood Drive, public views of the Project Site from Laurelwood Drive are currently limited.

  As shown in Figure IV.A-12, new buildings would be noticeable from this viewpoint under the Project due to Project Site's proximity and the increased building footprint and height. However, there would be no change in the visibility of the foreground scenic resource (i.e., the Santa Monica foothills), little change in the visibility of the midground scenic resource (i.e., the San Fernando Valley skyline), and no change in the visibility of the background scenic resource (i.e., the Santa Susana and San Gabriel Mountains) from this viewpoint under the Project. More importantly, most of the valley floor would continue to be visible behind the buildings, and the buildings would not project up and into the views of the valley skyline or the mountains beyond. This viewpoint also demonstrates how the Project would represent an intensification of development on an already fully-developed site rather than development of an undeveloped site. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 12 (Laurelcrest Dr.): As shown in Figure IV.A-13 on page IV.A-37, Viewpoint 12 is an elevated northwesterly partial public view approximately 0.36 miles to the southeast of the Project Site. Due to vegetation, fencing and existing development along Laurelcrest Drive, public views of the Project Site from Laurelcrest Drive are currently limited. Some of the existing buildings on the Project Site are minimally visible above the house in the foreground to the left (west) of the tall tree.

  As shown in Figure IV.A-13, the upper portions of some of the new buildings would be visible from this viewpoint under the Project due to the increased building footprint and height. However, there would be little change in the visibility of the San

Fernando Valley skyline and no change in the visibility of the Santa Susana Mountains from this viewpoint under the Project. Most importantly, while the heights of the proposed buildings would project above the valley floor from this viewpoint, some of the valley floor would continue to be visible behind the buildings, and the buildings would not project up and into the views of the mountains beyond. Furthermore, the overall height and width of the view available from this viewpoint, which is already constrained by the trees and development on the left side of the view, would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

- Viewpoint 13 (11241 Laurie Dr.): As shown in Figure IV.A-14 on page IV.A-38, Viewpoint 13 is an elevated somewhat expansive northwesterly public view located approximately 0.85 miles to the southeast of the Project Site. The mid- and upper levels of some of the buildings on the Project Site are currently slightly visible just to the right of the tree in the center of the view.

  As shown in Figure IV.A-14, the changes in the appearance of development at the Project Site from this viewpoint under the Project would be minimal, with little change in both the visibility of the building footprint and height. There would be little change in the visibility of the foothills, the San Fernando Valley skyline, and the Santa Susana Mountains. Most importantly, most of the valley floor behind the proposed buildings would continue to be visible from this viewpoint, and the buildings would not project up and into the views of the mountains beyond. Furthermore, the overall height and width of the view available from this viewpoint would not be reduced. Therefore, the Project would not result in a substantial adverse effect on a scenic vista from this viewpoint.

In summary, and to contextualize the descriptions set forth above, it is noted that the Project would result in some changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site. However, the Project would not substantially reduce or block existing views of scenic resources available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. Rather, the Project would place buildings and other improvements on a site that is already fully developed with numerous studio buildings and located in a developed urbanized area. **In addition, in accordance with SB 743, aesthetic impacts associated with scenic vistas would not be considered significant.**

(2) Mitigation Measures

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant. Therefore, no mitigation measures are required.

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(3) Level of Significance After Mitigation

Project-level impacts related to scenic vistas were determined to be less than significant based on SB 743.

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

As discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, the Project Site is not located along or near a state scenic highway. The two closest State Scenic Highways (or segments thereof) to the Project Site are: (1) the segment of Topanga Canyon State Scenic Highway (SR-27) between mile markers 1.0 and 3.5 located approximately 13 miles to the west and (2) the segment of SR-2 northeast of La Cañada Flintridge starting in Falls Canyon and extending north and then east, located approximately 13 miles to the northeast.[25] The Project Site is not located within the viewshed of either of these State Scenic Highways (due both to distance and topography). **In addition, in accordance with SB 743, aesthetic impacts associated with scenic resources would not be considered significant.**

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

(1) Impact Analysis

(a) Overview of Project Components Related to Scenic Quality

As discussed above, the Project Site is located in an urbanized area and is already developed with studio-related buildings and includes concrete-lined segments of the Tujunga Wash and Los Angeles River.

As discussed above, scenic features within the Project Site that contribute to the scenic quality of the Project Site include potential historical resources and mature trees. As discussed further below, these existing scenic features of the Project Site would continue to contribute to the Project Site's scenic quality upon completion of construction activities. Additional open space areas with an overall increase in trees and landscaping would also be provided, which would further enhance the aesthetics and visual appearance of the urban environment immediately surrounding the Project Site upon completion of the Project. In addition, as

[25] *California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed January 15, 2025.*

discussed in Section II, Project Description, of this Draft EIR, the proposed Specific Plan establishes height subareas with specified height limits that concentrate taller building heights in the center of the Project Site, away from the Project Site's edges. The proposed Specific Plan also includes setbacks and stepbacks that would provide additional buffers along the Project Site. As discussed below and in Section IV.J, Land Use and Planning, of this Draft EIR, the proposed Specific Plan and proposed Design Standards include a number of other provisions that would enhance the visual character of the Project Site and the areas along the perimeter of the Project Site.

As discussed in detail in Section II, Project Description, of this Draft EIR, the Project also includes a Sign District (see Appendix C) that would regulate signage external and internal to the Project Site. With the proposed Sign District, a total of up to approximately 41,704 square feet of exterior signage that is externally visible on-site is proposed to be located within the Project Site. In addition to the signage along the Tujunga Wash, Los Angeles River, and Colfax Avenue, the proposed Sign District anticipates up to approximately 59,400 square feet of mural, graphics, art installations, or other non-sign graphics along the external facing wall of the studio buildings. Signage anticipated to be located along the exterior would include supergraphic signs, as well as those typically allowed under the LAMC (e.g., wall signs, architectural ledge signs, illuminated architectural canopy signs, roof signs, and window signs). Digital displays would be prohibited along the Project Site exterior. Refer to Figures II-25 through II-29 of Section II, Project Description, of this Draft EIR, for a depiction of the proposed signage.

As discussed further below, the Project would also integrate various types of lighting to provide for continued studio activities. The proposed Specific Plan includes regulations to address both light and glare from proposed lighting. These regulations have been incorporated into Project Design Features AES-PDF-4 through AES-PDF-17, above.

Figure IV.A-15 through Figure IV.A-24 above provide graphics showing existing conditions and conditions with buildout of the Project. As demonstrated in these figures, the Project would enhance the scenic quality of the Project Site and vicinity by providing new landscaping, compatible high-quality building design, and undergrounding of new utilities.

(b) Analysis of Potential Impacts Associated with the Potential to Conflict with Zoning and Other Regulations Regarding Scenic Quality

As discussed previously, a number of existing City plans and regulations governing scenic quality are applicable to the Project, including the City's General Plan (i.e., the Framework Element, Conservation Elements and the Community Plan,) the RIO, the LAMC,

and the Citywide Design Guidelines.[26] Whether the Project would conflict with the applicable scenic quality-related goals, objectives, policies and requirements of these plans, and with the applicable scenic quality-related requirements of the LAMC is evaluated below.

Note that during construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of existing buildings and surface parking lots and grading and construction activities. During construction, the Project would implement Project Design Feature AES-PDF-1, which requires opaque construction fencing to be installed around construction sites that are visible from the adjacent public streets, the Los Angeles River, and the Tujunga Wash. The Project would also implement Project Design Feature AES-PDF-2, which requires that outdoor lighting be directed away from adjacent residential properties and the public right-of-way. As such, construction activities would not substantially alter or degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements, such as lighting, that detract from the visual character of the surrounding area for the following reasons: (1) views of construction activities would be limited by construction fencing and would cease upon completion of construction activities; (2) the site appearance would be typical of construction sites in urban areas; and (3) construction would occur within an urban setting with a high level of human activity and development. As such, temporary construction activities would not conflict with applicable zoning and other regulations related to scenic quality. **In addition, in accordance with SB 743, aesthetic impacts associated with consistency with zoning and regulations related to scenic quality would not be considered significant.**

(i) General Plan Framework Element

The chapters of the Framework Element most relevant to scenic quality include the Land Use Chapter, the Urban Form and Neighborhood Design Chapter and the Open Space Chapter. Whether the Project would conflict with the applicable goals, policies and objectives of these chapters related to scenic quality is evaluated below.

[26] *The City's Mulholland Scenic Parkway Specific Plan is not listed because, while the Project would potentially impact the views from Major Vista Points along Mulholland Drive designated in the Specific Plan, the Project would be located outside the Specific Plan area (i.e., the designated inner and outer corridors around Mulholland Drive) and would, thus, not be subject to the development guidelines of the Specific Plan. Similarly, the Mobility Plan is not listed because, while the Mobility Plan identifies interim development guidelines for development along City-designated scenic highways, such Laurel Canyon Boulevard and Coldwater Canyon Avenue, for which scenic parkway specific plans have not yet been adopted, the Project Site is neither visible from these streets nor located along these streets, where the interim development guidelines would be applicable.*

Land Use Chapter

Consistent with Policy 3.2.4 that addresses scale and character, the Project would include features that would maintain the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. The Project would do so by providing: (1) new studio uses that are consistent with the existing studio uses on the Project Site; (2) height subareas, setbacks, and stepbacks from the existing adjacent development (see Figure II-17 in Section II, Project Description, of this Draft EIR) to concentrate building height and mass in the center of the Project Site away from its edges; (3) ample trees and other landscaping along the Project Site frontages (see Figure II-7 in Section II, Project Description); (4) controls on Project lighting (see Project Design Features AES-PDF-3 through AES-PDF-17 above); and (5) architecture that is compatible with the existing architecture on-site and within the greater neighborhood. For additional discussion of the Project's impacts related to Policy 2.3.4, refer to Table 2 in Appendix K of this Draft EIR.

The Project would be consistent with Policy 3.2.3 and Objective 3.16 regarding emphasizing pedestrian and bicycle access and Policy 3.9.7 regarding streetscape improvements. Specifically, the Project would provide pedestrian enhancements, including a new multi-modal bridge, the Radford Bridge, which would extend from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. This new bridge would provide public pedestrian and bicycle access across the Tujunga Wash and include a new studio-related vehicle access path, as well as ramps and/or stairs to provide direct access to the Los Angeles River trail system. Additionally, the existing alley, adjacent to the southern portion of the South Lot, may be improved to provide stormwater management best practices. Finally, along Radford Avenue, enhanced sidewalks and a landscaped setback are proposed, along with a Class IV protected bikeway from Hoffman Street to the Radford Bridge. For additional discussion of the Project's impacts related to Policies 3.2.3 and 3.9.7 and Objective 3.16, refer to Table 2 in Appendix K of this Draft EIR.

The Project would also be consistent with Policy 3.2.4 regarding development that maintains the character of neighborhoods and Policy 3.9.6 regarding height and scale. Specifically, the Project, with its proposed height subareas that concentrate height within the center of the Project Site, landscaped open space areas, contemporary design, and integration of historic uses that help define the character of the Project Site and surrounding area, would minimize the Projects impacts on the visual character of the adjacent residential uses. For additional discussion of the Project's impacts related to Policies 3.2.4 and 3.9.6, refer to Table 2 in Appendix K of this Draft EIR.

Based on the above, the Project would not conflict with the applicable scenic quality goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

Urban Form and Neighborhood Design Chapter

The Project would promote the City's goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project by contributing to the overall livability of the City. Specifically, the Project would support Objective 5.2, which encourages future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region, by expanding the existing studio uses within an area well-served by public transit, specifically Metro and DASH, with bus stops in close proximity to the Project Site. The proposed uses would be consistent with the existing uses on-site, as well as be compatible with the other commercial developments located adjacent to and in the general vicinity of the Project Site. For additional discussion of the Project's impacts related to Objective 5.2, refer to Table 2 in Appendix K of this Draft EIR.

The Project would also support Objective 5.8 regarding establishing a strong pedestrian orientation and Objective 5.5 regarding enhancing the livability of all neighborhoods by upgrading the quality of development and improving the quality of the aesthetics and visual appearance of the urban environment immediately surrounding the Project. Specifically, as discussed above, the Project would provide pedestrian enhancements, including the Radford Bridge, which would provide public pedestrian and bicycle access to the Tujunga Wash and include a new studio-related vehicle access, as well as ramps and/or stairs to provide direct access to the LARRMP improvements. Additionally, the existing alley adjacent to the southern portion of the South Lot may be improved to provide stormwater management best practices. Along Radford Avenue, enhanced sidewalks and a landscaped setback, as well as a Class IV bikeway from Hoffman Street to the Radford Bridge, are proposed. Radford Avenue improvements also consist of below-grade utility lateral trenching, and relocations and improvements to the existing Art Walk. For additional discussion of the Project's impacts related to Objectives 5.5 and 5.8, refer to Table 2 in Appendix K of this Draft EIR.

The Project also supports Policy 5.8.4 regarding signage that is integrated with the architectural character of the buildings and conveys a visually attractive character. As discussed above, the proposed Sign District would regulate signage in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. As shown in Figure IV.A-15, Figure IV.A-17, Figure IV.A-19, and Figure IV.A-24, above, Project signage would be integrated with and complement the overall aesthetic character of on-site development and would be designed to enhance the studio character of the Project Site. For additional discussion of the Project's impacts related to Policy 5.8.4, refer to Table 2 in Appendix K of this Draft EIR.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies related to scenic quality set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

The Project would develop new studio facilities on the Project Site, which is already developed with studio uses. The segments of the Los Angeles River and Tujunga Wash traversing the Project Site would not be developed as part of the Project. Thus, the Project would not convert open space to urban use or otherwise affect the City's natural setting. The Project would also support the goals and policies of the Open Space and Conservation Chapter, including Policy 6.4.8, by providing a variety of open space areas within the Project Site. Specifically, the Project would provide 109,569 square feet of landscaped area along the Project Site frontages, including 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, approximately 4,454 square feet of landscaped area along Colfax Avenue, and approximately 27,709 square feet of landscaped area along Radford Avenue. Additional open space and landscaping would be provided within the Project Site, including various ground level open space areas and rooftop terraces. Planting zones and associated plant palettes would be established to define streetscape areas, Project Site entrances, production areas, bungalows, and the rooftop terraces. The rooftop terraces would be designed as landscaped open spaces to be used for meetings, special events, filming, and other production-related activities. In addition, along Radford Avenue, enhanced sidewalks, a landscaped setback, and a Class IV bikeway are proposed.

Based on the above, the Project would not conflict with the applicable scenic quality goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter.

(ii) General Plan Conservation Element

The Project would not conflict with the City's goal to preserve, protect, and enhance its existing natural resources that contribute to aesthetic quality. Specifically, the Project Site is located within an urbanized area and does not contain any large expanses of open space or natural areas. While the Los Angeles River and Tujunga Wash traverse the Project Site, they are modified concrete-lined channels that support very limited aquatic habitat and are ecologically disconnected from the rest of the Project Site by the approximately 15-foot-tall concrete side walls. With respect to trees, 625 trees were documented during the tree inventory, including 609 on-site trees and 16 street trees located in the adjacent public right-of-way. The on-site trees include 45 protected tree or shrub species, including 35 coast live oaks, nine western sycamores, and one toyon, pursuant to City of Los Angeles Tree Preservation Ordinance No. 186,873. The protected oak and sycamore trees are generally

located on the northern and western perimeters of the Project Site and on existing slopes between the studio's structures and the Los Angeles River.[27]

These trees are planted and not naturally occurring. The Project would comply with the existing replacement ratio of 4:1 for permitted protected tree removals and the replacement ratio of 2:1 for street tree removals. Furthermore, the Project would result in a net increase in on-site trees at buildout.

As discussed further in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (the Mill Building, the Administration Building and Stage 2), as well as the potential Mack Sennett Historic District. The Project would remove three non-contributors and two contributors to the potential historic district. The contributing buildings to be retained would include the largest and most physically prominent of the contributing buildings (the Mack Sennett Building, Stage 9, and Stage 10), as well as the two contributors that retain the highest level of integrity (Stage 9 and Stage 10). The potential historic district would retain integrity of location, design, setting, feeling and association, and, as such, impacts would be less than significant. In addition, all new construction proposed by the Project would be generally located north and east of contributing buildings to the potential historic district and would not be located within the spaces between contributing buildings. This includes the area between the potential Mack Sennett Historic District and Radford Avenue, which currently allows public views to contributing buildings, including the Mack Sennett Building (the historic public face of the studio lot) and portions of Stage 9.

In addition, the Mill Building, which is a potentially eligible individual historical resource, would be partially relocated from the southern edge of the South Lot to the southeastern corner of the North Lot. This building would continue to retain sufficient integrity such that it would continue to retain its historic significance, and, as such, impacts would be less than significant. The Mill Building is currently located along the alley to the south of the Project Site. However, the metal frame shed addition to the south of the building, which was added in 1997 and is not a contributing feature, is the portion of the Mill Building that is visible from the adjacent public alley. In addition, with the proposed relocation of the Mill Building, it would become visible to public areas located to the east of the Project Site. The Administration Building and Stage 2, which are also potential historical resources, would be retained in their current location and would continue to convey their historical significance. The Administrative Building would retain its visual prominence when viewed from the public right-of-way along Radford Avenue. Stage 2 would also retain its visibility from Radford Avenue. As such, views of historical resources would continue to contribute to the scenic quality of the Project Site.

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[27] *Cy Carlberg, ASCA Registered Consulting Arborist #405, Tree Inventory Reports, Radford Studio Center (North Lot), April 2024. Included as Appendix B of the Biological Resources Report.*

The Conservation Element's scenic quality objective and policy focus on the protection and reinforcement of natural and scenic vistas as irreplaceable resources, including landforms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (e.g., historical resources, oceans, mountains, and unique natural features), for the aesthetic enjoyment of present and future generations. The Project Site is a relatively flat site that is already fully developed with urban uses and does not contain any of the landforms or unique scenic features listed other than historical resources, which, as discussed above, the Project would not have significant impacts from a scenic or historical resources perspective. In addition, as discussed in the scenic vistas analysis under Threshold (a) above, the Project would not have a substantial adverse effect on a scenic vista.

Based on the above, the Project would not conflict with the applicable scenic quality goals, objectives, and policies related to scenic quality set forth in the Conservation Element.

(iii) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

An analysis of whether the Project would conflict with the applicable scenic quality-related goals, objectives and policies of the Community Plan is provided in Table IV.A-4 on page IV.A-77. These goals, objectives and policies address historic character, quality design that is compatible with existing uses, aesthetics of parking areas, landscaped corridors, and the creation and preservation of open space. As demonstrated therein, the Project would not conflict with the applicable goals, policies and objectives in the Community plan related to scenic quality.

An analysis of whether the Project would conflict with the applicable scenic quality-related urban design policies of the Community Plan is provided in the second half of Table IV.A-4. These policies address height and building design, design of parking structures, surface parking, and light and glare. As discussed therein, the Project would not conflict with these policies.

Based on the above and as presented in Table IV.A-4, the Project would not conflict with the applicable scenic quality-related goals, objectives, and policies of the Community Plan.

Table IV.A-4
Project Consistency with Applicable Scenic Quality-Related Goals, Objectives and Policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Goals/Objectives/Policies[a]	Would the Project Conflict?
Goals, Objectives and Policies:	
Policy 2-1.3: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development. Objective 2-4: To enhance the appearance of commercial districts. Policy 2-4.2: Preserve community character, scale and architectural diversity. Policy 3-1.2: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**No Conflict.** The Project would enhance the character of the Project Site and provide for compatible development and architectural diversity by providing a high-quality design that would be compatible with existing uses and preserve the community character. The Project would retain the Project Site's primary land use as a studio facility, which has operated in the neighborhood since the 1920s. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is located in an urbanized area that is developed with a mix of land uses. The major arterial in the immediate vicinity of the Project Site, Ventura Boulevard, is lined with commercial, institutional, and residential uses, with residential neighborhoods interspersed between the major arterials. Other major arterials in the Project Site vicinity include Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, all of which are generally lined with medium and high density multi-family residential uses and commercial uses. To enhance the appearance of the commercial areas surrounding the Project Site, the Project would include landscaped setbacks and high quality building design. As described in Section II, Project Description, of this Draft EIR, the Specific Plan would establish height subareas (Subareas A through D) with specified height limits and limited height allowances to regulate building heights throughout the Project Site, with taller maximum heights concentrated in the center of the Project Site, away from Project Site edges. This would reduce the scale of the new buildings as viewed from adjacent streets. A 17-foot-wide setback area would be provided along Radford Avenue in the North Lot, and a 10-foot-wide setback area would be provided along Radford Avenue in the South Lot. A 15-foot-wide setback would be provided along Colfax Avenue in the South Lot. Setbacks would function as buffers and transitional space around the Project Site perimeter. Further, the Los Angeles River and Tujunga Wash function as approximately 97- to 150-foot-wide buffers from the residential uses across those channels. Furthermore, as discussed above, the Project also proposes a Sign District for on-site signage, which would establish clear standards to ensure cohesion and compatibility with the surrounding land uses. The Project would include new landscaping and street trees, lighting, wayfinding signage, and pedestrian/transit seating areas. The Project would improve the surrounding pedestrian environment by widening sidewalks and upgrading crosswalks and traffic signals to enhance visibility and safety. The Project

Table IV.A-4 (Continued)
Project Consistency with Applicable Scenic Quality-Related Goals, Objectives and Policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Goals/Objectives/Policies[a]	Would the Project Conflict?
	specifically includes 109,569 square feet of landscaped area along the Project Site frontages, including 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, 4,454 square feet of landscaped area along Colfax Avenue, and 27,709 square feet of landscaped area along Radford Avenue. In addition, enhanced sidewalks, a landscaped setback, and a Class IV bikeway are proposed along Radford Avenue. The proposed Specific Plan also provides specific design standards, with particular emphasis on facade materials and rooflines visible from the public rights-of-way. These design standards would help the Project achieve a high level of quality, distinctive character, and compatibility with existing on-site uses and development, as well as with the surrounding uses, and are intended to provide a pedestrian-scale, inviting, and well-designed ground floor façade along public street frontages, while maintaining studio security and operations. Overall, the proposed development would be designed to be compatible with the general characteristics of the surrounding neighborhood. The Project would enhance the areas immediately surrounding the Project Site through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Visual screening and fencing would be maintained in a clean and well-kept manner, including through the repair of broken walls and removal of graffiti, and improved with either low maintenance landscaping, hardscape, or a combination of both. The Project, with its landscaped open space areas, contemporary design, and integration of historic uses that help define the character of the Project Site and surrounding area, would contribute to the urban elements of the Project vicinity. Therefore, the Project would not conflict with this objective or policies.
Policy 2-4.3: Improve safety and aesthetics of parking areas in commercial areas.	**No Conflict.** The Project would improve the safety and the aesthetics of on-site parking areas. Specifically, with regard to above-grade parking structures, the proposed Specific Plan sets forth design standards regarding the following: the height of enclosure walls, which must effectively block light emitted on a horizontal plane from the structure; the location of vehicular entrances and exits so as to minimize interference with pedestrian and vehicular traffic on the adjacent streets; screening of any new public rights-of-way-facing parking structure façades along Radford Avenue, Moorpark Street, and Colfax Avenue, with architectural articulation, landscaping including vegetated walls and vertical gardens, and/or use of compatible building materials; and the screening of rooftop

Table IV.A-4 (Continued)
Project Consistency with Applicable Scenic Quality-Related Goals, Objectives and Policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Goals/Objectives/Policies[a]	Would the Project Conflict?
	parking with a parapet wall to shield light. Therefore, the Project would not conflict with this policy.
Policy 2-4.4: Landscaped corridors should be created and enhanced through the planting of street trees along segments with no building setbacks and through median plantings.	**No Conflict.** The Project would result in a net increase in trees on the Project Site with new trees provided along the Radford Avenue, Los Angeles River, and Tujunga Wash frontages as shown in Figure II-7 in Section II, Project Description, of this Draft EIR. In addition, as shown in Figure II-17 in Section II, the Project would provide setbacks along the Radford Avenue and Colfax Avenue frontages. Landscaping within the setback areas would be required, with an emphasis on California native and/or climate adapted species. Hedges and vines would be required along all freestanding fences and walls both in the setback areas and throughout the Project Site. As discussed above under Policy 2-1.3, the Project would also provide 109,569 square feet of open space along the Project Site frontages. Therefore, the Project would not conflict with this policy.
Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources. Objective 5-1: To preserve existing open space resources and where possible develop new open space. Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.	**No Conflict.** Existing open space on the Project Site is generally limited to small, landscaped areas. As discussed above under Policy 2-1.3, the Project has been designed to enhance the areas along all Project Site frontages and public access to the Los Angeles River and Tujunga Wash, while continuing to provide for the unique security needs of a working production studio. Approximately 109,569 square feet of landscaped area would be provided along the Project Site frontages, including approximately 77,406 square feet of landscaped area along the Los Angeles River and Tujunga Wash frontages, approximately 4,454 square feet of landscaped area along Colfax Avenue, and approximately 27,709 square feet of landscaped area along Radford Avenue. Therefore, the Project would not conflict with this goal, objective, and policy.
Goal 16: Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance. Objective 16-1: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced. Policy 16-1.1: Encourage the preservation, maintenance, enhancement, and reuse of existing historically significant buildings and the restoration of original façades.	**No Conflict.** As discussed further in Section IV.D, Cultural Resources, of this Draft EIR, the Project Site includes three potentially historic structures (the Mill Building, the Administration Building, and Stage 2), as well as the potential Mack Sennett Historic District. The Project would retain these three buildings, as well as the potential historic district, and, as such, impacts to these resources would be less than significant. In addition, as discussed above, views of the Administration Building and Mack Sennett building would be enhanced with the Project. Also refer to Section IV.D, Cultural Resources, regarding the project design features and mitigation measures that would be implemented to ensure the preservation of these buildings, including the original façades.

Table IV.A-4 (Continued)
Project Consistency with Applicable Scenic Quality-Related Goals, Objectives and Policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Goals/Objectives/Policies[a]	Would the Project Conflict?
	Based on the above, the Project would not conflict with this goal, objective, and policy.
Urban Design Policies (only applicable scenic quality-related policies are listed):	
Height and Building Design: The mass, proportion and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest and enhance the street scape by providing continuity and avoiding opportunities for graffiti. Building materials shall be employed to provide relief to bland untreated portions of exterior building façades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character. Accordingly, the following policies are proposed: 1. No structure should exceed two stories in height within 15 feet and 30 feet of front and rear property lines, respectively. 2. Maximizing the area devoted to transparent building elements, for front façades and façades facing rear parking. 3. Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building façades. 4. Providing accenting, complementary building materials to building façades. 5. Maximizing the applications of architectural features or articulations or building façades. 6. Designating architecturally untreated façades for signage. 7. Screening of mechanical and electrical equipment from public view. 8. Screening of all rooftop equipment and building appurtenances from public view. 9. Requiring the enclosure of trash areas for all projects.	**Partially Consistent.** Refer to Policy 2-3.1, above regarding the compatibility of the Project with the surrounding uses and proposed pedestrian, open space, and landscaping that would improve the visual character of the Project Site. The proposed Specific Plan and proposed Design Standards would ensure consistency with the intent of Urban Design Policies 1 through 9. With regard to Policy 1, given the irregular configuration of the Project Site, no rear lot lines exist to which Policy 1 would apply. Therefore, no building is located within 30 feet of the rear property line. However, both existing and proposed structures on-site deviate from the stated height and setback parameters of Policy 1 regarding the front property line. Existing buildings provide alternate means of compliance with regard to relief of building façades and avoiding large sterile building walls. The proposed buildings would focus taller structures within the center of the Project Site. While there are some instances where structures exceeding two stories within 15 feet of the front property line are proposed, those buildings are designed with similar alternate means of compliance to those currently existing on-site (e.g., the use of complementary building materials to building façades (Policy 4), articulations (Policy 3), etc.). In particular, the proposed Specific Plan and Design Standards address building entrances, façade articulation (Policy 5), glass glazing (Policy 2), design of parking structures, limitations of surface parking areas, setbacks and stepbacks, site access, transparency of fencing, landscaping of setback areas, and screening of mechanical equipment (Policies 7 and 8) and trash enclosures (Policy 9) in accordance with the screening requirements contained in the applicable RIO requirements in LAMC Section 13.17 F.2(c). The proposed Sign District would ensure signage is appropriately situated throughout the Project Site and arranged on building facades to avoid large, sterile expanses of building walls (Policy 6). As such, the Project would not conflict with this urban design policy.
Parking Structures: Parking structures shall be integrated with the design of the building they serve through:	**No Conflict.** As discussed above, the proposed Specific Plan and Design Standards include specific requirements regarding the design of above-grade parking structures. For any proposed parking structures fronting the public right-of-way,

Table IV.A-4 (Continued)
Project Consistency with Applicable Scenic Quality-Related Goals, Objectives and Policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

Goals/Objectives/Policies[a]	Would the Project Conflict?
1. Designing parking structure exterior to match the style, materials and color of the main building. 2. Utilizing decorative walls, landscaping to buffer residential uses from parking structures.	requirements include ground-floor non-parking uses for the first 20 feet in depth of the ground floor or, alternatively, the use of specified building materials for screening that results in full architectural integration into the design and form of the Project (Policy 1). Additionally, the proposed Design Standards include requirements pertaining to fences and walls improved with hedges and vines to ensure that any residential uses to the west are sufficiently screened from any on-site automobile parking uses (Policy 2). Therefore, the Project would not conflict with this urban design policy.
Surface Parking Landscaping: 1. Devoting 2% of total surface area of surface parking lots to landscaping. 2. Providing a landscaped buffer along public streets or adjoining residential uses.	**No Conflict.** The proposed Design Standards require that new surface parking areas shall devote 2% of their surface area to landscaping and shall not be located within 10 feet of a public right-of-way. In addition, as discussed Section II, Project Description, of this Draft EIR, the Project would provide 17- and 15-foot-wide setbacks along Radford Avenue and Colfax Avenue, respectively. In addition, the Tujunga Wash and Los Angeles River would continue to provide an expansive buffer between the residential uses to the north and east and new development within the Project Site. The proposed Design Standards also include landscaping requirements for setback areas. Therefore, the Project would not conflict with this urban design policy.
Light and Glare: 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.** Consistent with Policy 1, the Project would install on-site lighting along all pedestrian walkways and vehicular access ways. In addition, Project Design Features AES-PDF-3 through AES-PDF-4 provided above include specific requirements to ensure that all lighting is designed such that residential uses will not be significantly impacted. Refer to the detailed analysis of lighting under Threshold (d), below. Therefore, the Project would not conflict with this urban design policy.

[a] *City of Los Angeles, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, adopted May 13, 1998.*

Source: Eyestone Environmental, 2025.

(iv) Los Angeles River Revitalization Master Plan

As discussed above, the LARRMP was adopted by the City in 2007 to provide a framework for restoring the Los Angeles River's ecological function and for transforming it into an amenity for residents and visitors to the City. In compliance with efforts to revitalize the Los Angeles River per the LARRMP and consistent with the RIO District Ordinance and the

County's Landscaping Guidelines, the Project would help beautify and enhance public access to the Los Angeles River and Tujunga Wash. Specifically, the Project would include approximately 77,406 square feet of frontage along the Project's western Los Angeles River and Tujunga Wash frontages. The Project would also provide a variety of open space and landscaping improvements, as well as pedestrian enhancements consistent with the LARRMP, including, but not limited to, the Radford Bridge that would extend from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. The Radford Bridge would provide public pedestrian and bicycle access across the Tujunga Wash and include ramps and/or stairs to provide direct access to the Los Angeles River trail system. Provided in Table IV.A-5 on page IV.A-83 is an analysis of whether the Project would conflict with the LARRMP's goal of greening the neighborhoods by addressing its sub-goals and recommendations related to scenic quality.

Based on the above, the Project would not conflict with the LARRMP's scenic quality-related goal of greening the neighborhoods, as well as its sub-goals and recommendations.

Table IV.A-5
Project Consistency with the Los Angeles River Revitalization Master Plan

Goals/Objectives/Policies	Would the Project Conflict?
Goals, Objectives and Policies:	
GOAL: GREEN THE NEIGHBORHOODS:[28] Sub-goal: Create a Continuous River Greenway: Recommendation #5.2: Establish a River Buffer area within and adjacent to the River that meets riparian or upland habitat requirements.	As shown in Figure II-17 in Section II, Project Description, of this Draft EIR, the Project would retain those on-site segments of Los Angeles River and Tujunga Wash, thereby providing an approximately 97-foot-wide buffer along the Tujunga Wash and an approximately 150-foot-wide buffer along the Los Angeles River. In addition, as shown in Figure II-8 in Section II, Project Description, all new buildings proposed along the Los Angeles River and Tujunga Wash would be set back from these two features with landscape screening provided as appropriate/feasible within the setback. In addition, as shown in Figure II-19 in Section II, Project Description, the Project would provide new and enhanced landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River. Lastly, the Project would meet all applicable riparian and upland habitat requirements, and in accordance with Project Design Feature BIO-PDF-1 in Section IV.C, Biological Resources, of this Draft EIR, no exotic invasive plant species will be permitted, including along the Los Angeles River and Tujunga Wash.
Sub-goal: Connect Neighborhoods to the River: Recommendations #5.4 and #5.6: Increase direct pedestrian and visual access to the river, including providing green arterial connections to the River.	As discussed above, the Project includes the Radford Bridge extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. The Radford Bridge would provide pedestrian and bicycle access across the Tujunga Wash and include ramps and/or stairs to provide direct access to the Los Angeles River trail system.
Sub-goal: Extend Open Space, Recreation, and Water Quality Features into Neighborhoods: Recommendation #5.7: Increase open space throughout the River Corridor. Where suitable, landscaped areas should be designed to meet upland habitat requirements.	See the consistency analysis for Recommendation #5.2 above.
Sub-goal: Enhance River Identity: Recommendations #5.12 and #5.13: Identify physical opportunities to improve the visibility and public perception of the River Corridor.	The Project would enhance the connection to the Los Angeles River trail system as discussed in the consistency analysis for Recommendation #5.4 above. In addition, as shown in Figure II-19 in Section II, Project Description, the Project would provide new and enhanced landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River. The Project would include signage, as well as decorative murals, graphics, art installations, or other non-sign graphics celebrating the Los Angeles River as shown in Figure IV.A-20 through Figure IV.A-24 on pages IV.A-45 through IV.A-49.

[28] *City of Los Angeles, Los Angeles River Revitalization Master Plan, April 2007.*

Table IV.A-5 (Continued)
Project Consistency with the Los Angeles River Revitalization Master Plan

Goals/Objectives/Policies	Would the Project Conflict?
Sub-goal: Incorporate Public Art Along the River: Recommendations #5.15 and #5.16: Identify physical opportunities to introduce art along the River that celebrates the history of the River and the diverse culture of the surrounding neighborhoods.	Regarding Recommendation #5.15, See the consistency analysis for Recommendations #5.12 and #5.13 above. Recommendation #5.16 speaks to interagency coordination between levels of government to introduce new opportunities for art around the Los Angeles River. The Project meets the intent of Recommendation #5.16 as discussed in the consistency analysis for Recommendations #5.12 and #5.13 above.

Source: Eyestone Environmental, 2025.

(v) Los Angeles Municipal Code

Consistency with RIO District

Table IV.A-6 on page IV.A-85 presents an analysis of whether the Project would conflict with LAMC Section 13.17 F, which establishes the development regulations in RIO districts most related to scenic quality. As demonstrated therein, while the Project would be inconsistent with or partially inconsistent with several of the development regulations, overall the Project would be consistent with the intent of the requirements for development in an RIO district.

See Threshold (d) below regarding the lighting requirements of the RIO and LARRMP and how the Project would not increase existing lighting along the Los Angeles River or Tujunga Wash.

Based on the above, the Project would generally not conflict with the intent of the development regulations in RIO District.

Table IV.A-6
Project Consistency with the Provisions of the LAMC Related to RIO District

LAMC § 13.17	Text of Code	Would the Project Conflict?
F.1	Landscaping shall conform to the following regulations: 75 percent of any Project's newly landscaped area shall be planted with any combination of the following: native trees, plants and shrubs, or species defined as WatershedWise, or species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes. This requirement is for new landscaping only and does not apply to existing landscaping.	**Generally No Conflict.** Tree species proposed for the Project would comply with the requirement by planting native trees, plants, and shrubs with the exception of White Stonecrop/Sedum album and Creeping Fig/Ficus Repens, both of which are intended to be planted on building rooftops. The Project's landscaping plan would otherwise consist entirely of species listed in the Los Angeles County River Master Plan Landscaping Guidelines Plant Palette and the California Native Plant Library. Therefore, the Project would generally not conflict with this provision of the RIO District.
F.2(a)	Loading areas and off-street parking facilities of three spaces or more, either on a surface lot or in a structure, shall be screened from the abutting public right-of-way and the River. However, such screening shall not obstruct the view of a driver entering or leaving the loading area or parking facility, or the view from the street of entrances and exits to a loading area or parking facility, and shall consist of one or a combination of the following: (i) A strip at least 5 feet in width of densely planted shrubs or trees which are at least 2 feet high at the time of planting and are of a type that may be expected to form, within three years after time of planting, a continuous, unbroken, year round visual screen; or (ii) A wall, barrier or fence of uniform appearance. Such wall, barrier or fence may be opaque or perforated, provided that not more than 50 percent of the face is open. The wall, barrier or fence shall, when located in either the rear or side yards, be at least 4 feet and not more than 6 feet in height.	**No Conflict.** The Project would provide a setback area ranging from 10 feet to 17 feet in width along the Radford Avenue frontage, as well as a 15-foot-wide setback area along Colfax Avenue. Off-street parking would be screened from view from the public right-of-way by a combination of architectural treatments and/or intervening development. Loading areas would not be located adjacent to the Los Angeles River. Exterior fencing would be of uniform, attractive design and would predominantly be composed of alternating sections of tubular steel and masonry with architectural treatments and would not contain prohibited materials, such as chain link or barbed wire. All fencing facing the Project's side yards along the alley way and river front, would be of allowable height pursuant to the Specific Plan. The Design Standards of the Specific Plan would supersede the development regulations of the RIO and would allow perimeter fencing up to 12 feet in height in the side yards. The Project Site contains no rear lot lines. Therefore, the Project would not conflict with this provision of the RIO District.
F.2(b)	Electrical transformers, mechanical equipment, water meters and other equipment shall be screened from public view. The screening may be opaque or perforated, provided that not more than 50 percent of the face is open. The screen shall be at least 6 inches taller than the equipment and not more than 2 feet taller than the equipment.	**No Conflict.** All electrical transformers, mechanical equipment, water meters, and other equipment would be located within the interior of the Project Site and/or screened from public view through the landscaping and perimeter fencing outlined above. Therefore, the Project would not conflict with this provision of the RIO District.

Table IV.A-6 (Continued)
Project Consistency with the Provisions of the LAMC Related to RIO District

LAMC § 13.17	Text of Code	Would the Project Conflict?
F.2(c)	Exterior trash enclosures shall: (i) be designed to complement the primary building with a wall height that exceeds the disposal unit it is designed to contain by at least 18 inches; (ii) have a solid roof to deter birds and block views from adjacent properties; (iii) have solid metal doors that accommodate a lock and remain closed when not in use; and (iv) not be constructed of chain link or wood.	**No Conflict.** All exterior trash enclosures would be fully screened disposal units, with solid roofs and metal doors. The enclosures would be composed of concrete masonry units or similar solid material. Therefore, the Project would not conflict with this provision of the RIO District.
F.2(d)	With the exception of single-family homes, all projects facing a street that crosses the river or terminates at the river or a river frontage road shall have all fences within the front or side yards visible from said street consistent with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines.	**No Conflict.** All perimeter fencing facing the river and river frontage road would be designed in keeping with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines. They would be composed of a variety of materials, predominantly tubular steel interposed with sections of masonry with architectural treatments; would not contain prohibited materials, such as chain link and barbed wire; and would be of an allowable height pursuant to the Specific Plan. Therefore, the Project would not conflict with this provision of the RIO District.
F.3	(a) All site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down). (b) All low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such a manner as to not exceed the limitations in Subdivision 3.(a), above.	**Inconsistent.** The LAMC lighting regulations for the RIO were established in 2014, and do not account for the operation of the studio since the 1920s and the unique nature of the Project Site, which includes portions of the Los Angeles River and Tujunga Wash with dedicated easements. Existing and historical lighting levels at the Project Site exceed these standards. As such, the proposed Specific Plan includes specific lighting regulations that would supersede this section of the LAMC and also ensure that Project lighting would not exceed existing levels and not impact off-site sensitive uses as discussed in detail below under Threshold (d). In addition, as discussed in Section IV.C, Biological Resources, of this Draft EIR, lighting from the Project would not impact any sensitive species in the Project vicinity, including species that may be present in the vicinity of the concrete-lined Los Angeles River and Tujunga Wash. Thus, the Project would be inconsistent with this provision.
F.4(a)	Landscape Buffer. All Projects shall provide a 10-foot landscape buffer as measured from the Project's property line adjacent to the river	**Inconsistent.** The existing on-site improvements and roadways currently meet the required landscape buffer around the Los Angeles River. The Project's

Table IV.A-6 (Continued)
Project Consistency with the Provisions of the LAMC Related to RIO District

LAMC § 13.17	Text of Code	Would the Project Conflict?
	except where a roadway is located within that 10 feet. New building structures or parking shall not be permitted within the 10-foot landscape buffer.	new construction would be consistent with the regulations of the proposed Specific Plan, which would include a combination of buildings, roadways, landscaping, and other structures along the lot line adjoining the Los Angeles River. Thus, the Project would be inconsistent with this provision.
F.4(b)	Fence. All fences located within 10 feet of the river corridor or a river frontage road street or any adjacent street shall be consistent with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines. With the exception of single-family homes, all Projects shall be required to maintain a visual connection between the river corridor and/or frontage road and the abutting property.	**No Conflict.** All perimeter fencing facing the Los Angeles River and river frontage road would be designed in keeping with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines. They would be composed of a variety of materials, predominantly tubular steel interposed with sections of masonry covered by architectural treatment, and would not include prohibited materials, such as chain link and barbed wire. Therefore, the Project would not conflict with this provision of the RIO District.
F.4(c)	Fence Height. All fences located less than 10 feet from the river shall be no higher than 6 feet in height. All fences located at the 10 foot landscape buffer setback line shall not exceed 10 feet in height. A fence located within a landscape buffer that is also a project's front yard shall be limited in height to 3 feet 6 inches.	**Partially Consistent.** The Project includes existing and proposed fences and walls of variable heights, which would partially comply with the height limitations of the RIO development standards. All perimeter fencing facing the Los Angeles River and river frontage road would be designed in keeping with the fence designs identified in the Los Angeles County River Master Plan Landscape Guidelines. However, consistent with the existing conditions of the studio (which has been in operation for nearly 100 years), new fencing along the Los Angeles River would exceed the height limits identified in the Los Angeles County River Master Plan Landscape Guidelines as allowed by the Design Standards (Appendix A) of the proposed Specific Plan. The Design Standards of the Specific Plan would supersede the development regulations of the RIO and would allow perimeter fencing up to 12 feet in height in the side yards. Therefore, the Project would not conflict with the general intent of this provision of the RIO District, which would be superseded by the standards established in the proposed Specific Plan.
F.4(d)	Gates. All gates or fences located within 10 feet of the river or a river frontage road shall be consistent with the gate designs identified in the Los Angeles County River Master Plan Landscape Guidelines. The gate height shall be consistent with the adjacent fence height and the gate shall be designed so as not to	**No Conflict.** The Project's design of gates would be consistent with the gate designs identified in the Los Angeles County River Master Plan Landscape Guidelines and would not include gates that would encroach into the Los Angeles River, street, or public right-of-way when opened. Therefore, the Project

Table IV.A-6 (Continued)
Project Consistency with the Provisions of the LAMC Related to RIO District

LAMC § 13.17	Text of Code	Would the Project Conflict?
	encroach into either the river, street or public right-of-way when opened.	would not conflict with this provision of the RIO District.
F.4(e)	Noise. All projects subject to a conditional use permit for the sale or dispensing of alcoholic beverages, including beer and wine, shall incorporate noise-attenuating features (physical as well as operational) designed by a licensed acoustical sound engineer to assure that operational sounds shall not exceed 5 decibels above the existing measured or presumed ambient levels of the property line(s) of properties on the opposite bank.	**Not Applicable.** The Project does not involve a request for a Conditional Use Permit to allow the sale and dispensing of alcoholic beverages. However, the Specific Plan would create an administrative procedure to allow for the sale and dispensing of alcoholic beverages. The Specific Plan would contain standard operating conditions to eliminate any public nuisance activity that might occur in conjunction with the sale and dispensing of alcoholic beverages. Further, the Project's array of uses and development would not result in the projecting of sound generated in conjunction with alcohol sales toward the Los Angeles River and would instead be focused to the interior of the Project Site. Therefore, the Project would not conflict with this provision of the RIO District.
F.4(f)	River Access. (i) With the exception of single- family homes, all river adjacent projects that partially or wholly abut the river shall have Americans with Disabilities Act compliant access gates from their property to the river. The gates shall also be accessible for bicycle entry. Access may be controlled and limited to residents, employees and/or visitors of the project. (ii) All single-family home projects that partially or wholly abut the river shall have access gates from their property to the river. Access may be controlled and limited, as desired by the owner.	**No Conflict.** The Project would provide access to the Los Angeles River in the form of gates with access controlled by Project employees, and a design that is Americans with Disabilities Act compliant and accessible for bicycle entry. **Not Applicable.** The Project does not involve the construction, use, and/or maintenance of a single-family dwelling. Therefore, the Project would not conflict with this provision of the RIO District.
F.4(g)	Riverfront Door. All projects located either adjacent to the river corridor or frontage road shall include a riverfront door visible to, and accessible from, the river corridor or frontage road.	**No Conflict.** Sound stage structures proposed to be located adjacent to the Los Angeles River frontage road would include riverfront doors. Therefore, the Project would not conflict with this provision of the RIO District.
H	**River Design Guidelines.** The Director of Planning shall prepare River Design Guidelines applicable to all RIO districts.	**No Conflict.** The River Design Guidelines establish best practices for designing projects located within the RIO District. The River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies address river-adjacent development. The Project would further the relevant objectives of the River Design Guidelines by employing high quality,

Table IV.A-6 (Continued)
Project Consistency with the Provisions of the LAMC Related to RIO District

LAMC § 13.17	Text of Code	Would the Project Conflict?
		attractive, and distinguishable architecture and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view. Therefore, the Project would not conflict with this provision of the RIO District.

Source: Eyestone Environmental, 2025.

Consistency with Other Aspects of LAMC

As discussed in detail in Section IV.J, Land Use and Planning, of this Draft EIR, the Project includes the proposed Specific Plan to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Radford Studio Center. The proposed Specific Plan would establish development guidelines and standards to regulate basic planning, design, and development concepts for future development on the Project Site. As such, the proposed Specific Plan would establish standards to regulate land use, massing, design, and development within the Project Site while allowing for adaptation to potential changes in technology or space requirements that are inherent to the pace of advancement in entertainment technology. The primary development regulations set forth in the proposed Specific Plan would address land use, design, historic regulations, childcare, alcohol sales, and parking, as well as associated implementation procedures.

Pursuant to LAMC Section 12.32, the Applicant is requesting a Vesting Zone Change from the existing [Q]MR2-1L-RIO and [Q]M2-1-RIO zones to the Radford Studio Center Specific Plan Zone (RSC Zone), thus creating a cohesive Project Site subject to uniform land use regulations. The proposed RSC zoning designation would set forth regulatory controls for the orderly and cohesive development of the Project Site comparable to existing zoning requirements, while recognizing the unique land uses that have been operating on the Project Site for many decades.

As discussed above, the Project also includes a proposed Sign District, which would regulate signage, in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. The proposed Sign District would regulate the permitted number of signs, sign types, sign heights, and the maximum area of signage permitted in the Site Interior (i.e., areas within the Project Site generally not visible from the public right-of-way and Los Angeles River) and along the perimeter. Several types of signs

would be prohibited throughout the Project Site, including off-site signs (i.e., billboards), and exterior-facing digital displays. Prohibited sign types would also include those that contain obscene matters, as defined in Section 311 of the State Penal Code; those that contain or consist of posters, pennants, banners, ribbons, streamers, or spinners, except as permitted by the LAMC; and those that contain flashing, mechanical, or strobe lights in conflict with the provisions of LAMC Sections 80.08.4 and 93.0107. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply.

A discussion of whether the Project would conflict with LAMC requirements regarding lighting and signage is provided in Table IV.A-7 on page IV.A-91.

Conclusion

Based on the above, with the approval of the proposed Specific Plan, associated RSC Zone, and Sign District, the Project would not conflict with the LAMC's provisions related to scenic quality.

Table IV.A-7
Consistency with LAMC Regulations Related to Lighting and Signage

LAMC Section	Would the Project Conflict?
Chapter I, Article 2, Section 12.21 A.5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.	The Project would comply with this requirement. In particular, the new parking structures would be designed to limit lighting to off-site areas through the regulations set forth in the proposed Specific Plan and Design Standards. These include incorporation of a parapet wall to prevent light intrusion onto adjacent streets and premises. Therefore, the Project would not conflict with this provision of the LAMC.
Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.	As discussed in detail under Threshold (d), below, Project signage would comply with the requirement and would not produce a light intensity greater than 3 foot-candles above ambient lighting levels at the property line of the nearest residentially-zoned property. Therefore, the Project would not conflict with this provision of the LAMC.
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.	The Project would comply with this requirement for street lighting along the Project Site's perimeter adjacent to the public street rights-of-way as part of the building permit process. Therefore, the Project would not conflict with this provision of the LAMC.
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 2 foot-candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view. 1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units. 2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units. 3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[29]	As discussed in detail under Threshold (d), below, Project signage would comply with this requirement. Specifically, Project stationary lighting would not exceed 2.0 fc at a residential use or other sensitive use property. Therefore, the Project would not conflict with this provision of the LAMC.
Chapter I, Article 3, Section 13.17, F, Division 3 (Specific to River Improvement Overlay). LAMC regulations set forth in the RIO relative to exterior	The LAMC lighting regulations for the RIO were established in 2014, and do not account for the operation of the studio since the 1920s or the unique nature of the Project Site,

[29] *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.*

Table IV.A-7 (Continued)
Consistency with LAMC Regulations Related to Lighting and Signage

LAMC Section	Would the Project Conflict?
site lighting are as follows: (a) all site and building mounted lighting shall be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5.0 percent of the total initial designed lumens shall be emitted at an angle of 90 degrees or higher from nadir (straight down); (b) all low pressure sodium, high pressure sodium, metal halide, fluorescent, quartz, incandescent greater than 60 watts, mercury vapor, and halogen fixtures shall be fully shielded in such manner as to not exceed the limitation specified in LAMC Section 13.17.	which is traversed by portions of the Los Angeles River and Tujunga Wash with dedicated easements. Existing and historical lighting levels at the Project Site exceed these standards. As such, the proposed Specific Plan includes specific lighting regulations that would supersede this section of the LAMC and also ensure that Project lighting would not impact off-site sensitive uses, as discussed in detail below under Threshold (d).

Source: Eyestone Environmental, 2025.

(vi) Los Angeles River Design Guidelines

As discussed above, the River Design Guidelines establish best practices for designing development projects located within the RIO District. The River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies addressing river-adjacent development. As discussed in Table IV.A-8 on page IV.A-93, the Project would support most of the applicable objectives of the River Design Guidelines. Specifically, the Project would consider river context, visibility, and access in building and site design (Objective 1) and maximize access to, and awareness of, the river and its relationship to the community (Objective 3) by enhancing public access to and views of the Los Angeles River and Tujunga Wash. The Project would also employ high quality, attractive, and distinguishable architecture (Objective 2) and minimize the quantity and appearance of visible parking and loading areas with the implementation of the parking structure design requirements set forth in the proposed Specific Plan and proposed Design Standards (Objective 4).

Table IV.A-8
Project Consistency with the RIO Design Guidelines

§	Text of River Design Guidelines	Would the Project Conflict?
Site Planning (Obj. 1)	1. Incorporate passageways or paseos into mid-block developments adjacent to the river, to facilitate pedestrian access to the river greenway, such that pedestrians and bicyclists will not need to walk or ride the perimeter of a block in order to access the river.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash. This would include future infrastructure and gates which would enable access to the Los Angeles River and Tujunga Wash from both Radford and Colfax Avenues.
	2. Activate the passageway or paseo so that they are safe and visually interesting spaces, using recycled water features, pedestrian-level lighting, artwork, benches, landscape or special paving.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash. This would include future infrastructure and gates which would enable access to the Los Angeles River and Tujunga Wash from both Radford and Colfax Avenues.
	3. In the setback area, adjacent to the river, establish a courtyard or "outdoor room" incorporating outdoor dining, seating or water features, for example.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash. This would include future infrastructure and gates which would enable access to the Los Angeles River and Tujunga Wash from both Radford and Colfax Avenues.
Building Orientation (Obj. 1)	1. Orient the long side of large-format retail to be parallel to the river corridor to physically define the edge of the public greenway. Large format retail buildings with multiple tenants should provide distinct entrances and storefronts to improve site design flexibility for future retail uses at the same location.	**Not Applicable.** The Project would involve the continued use and maintenance of an existing studio and does not include or propose large-format retail uses.
	2. Design and orient warehouse and industrial buildings such that the shorter width of the building is oriented towards the river.	**No Conflict.** Due to the amorphous footprint of the Project Site, as well as constraints imposed by existing buildings which are to be retained, some of the proposed soundstages would be oriented with their longer width fronting the Los Angeles River. However, the proposed Specific Plan and Design Guidelines would meet the intent of this guideline by providing for building breaks, architectural treatments, and other design elements that would be incorporated into the Project.

Table IV.A-8 (Continued)
Project Consistency with the RIO Design Guidelines

§	Text of River Design Guidelines	Would the Project Conflict?
Entrances (Obj. 1)	1. Promote pedestrian connectivity from the river by placing publicly accessible entrances at grade level or slightly above, and unobstructed from view from the river corridor. Avoid sunken entryways below the level of the adjacent river pathways.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash. The Project does not include entryways adjacent to a Los Angeles River pathway situated at a lower grade than the adjacent River pathway.
	2. In mixed-use residential, retail, and commercial projects as well as public facilities, ensure that ground floor uses, facing the river, maintain a high degree of transparency and maximize a visual connection to the river by providing clear and unobstructed windows, free of reflective glass coatings and exterior mounted gates or security grills.	**No Conflict.** The proposed Specific Plan would facilitate the modernization of a historic studio complex. To maintain a static environment for film and television production, soundstages must have opaque walls. However, these structures would be designed to incorporate doors which open toward the Los Angeles River frontage, as well as signage and artwork on exterior walls to provide a visual connection to the Los Angeles River.
Architecture (Obj. 2)	1. Design the building façade facing the river with the same quality of design, materials, and detail as street-facing facades. Please refer to Objective 2 of the respective Citywide Commercial, Industrial, or Residential Design Guidelines for a full description of the guidelines identified under each of the categories listed above.	**No Conflict.** The proposed Specific Plan would adhere to the Citywide Industrial Guidelines for buildings along the Los Angeles River by incorporating variations in building height and facade materials, as well as landscaping at entrances and along the Los Angeles River. Freestanding fences and walls would be required to be improved with hedges and vines by the proposed Design Standards. All storage and utility areas are screened from view from the Los Angeles River.
River Paths (Obj. 3)	On projects where a river pathway does not exist, work with the Los Angeles County Flood Control District and the City's River Project Office to establish a publicly accessible greenway, where feasible, within the public-right-of-way along the length of the property adjacent to the river. The path design may include trees, lighting, and site amenities such as trash receptacles, benches, drinking fountains and bike racks. Lighting, trees, and other site amenities should be selected from the Los Angeles County's River Master Plan Landscape Guidelines and Plant Palettes.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash. Further, the Project would provide new and enhanced landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River within the eastern portion of the Project Site.
Views (Obj. 3)	1. Create view opportunities to and from the river. 2. Preserve visual access to existing landmarks and overlooks within view corridors.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash, thereby

Table IV.A-8 (Continued)
Project Consistency with the RIO Design Guidelines

§	Text of River Design Guidelines	Would the Project Conflict?
		creating new view opportunities to and from the Los Angeles River.
Pocket Parks (Obj. 3)	Where feasible, provide a public easement adjacent to the river path. Improve the easement area as a pocket park, community garden or other public space.	**No Conflict.** The proposed Specific Plan would create zoning regulations allowing future installation of enhanced pedestrian amenities, trees, and landscaped areas along the Los Angeles River and Tujunga Wash.
Loading and Parking (Obj. 4)	Minimize the Quantity and Appearance of Parking and Loading Areas. Place on-site parking so that it does not dominate the river corridor.	**No Conflict.** On-site parking and loading would be concentrated within multi-story buildings and underground structures which are either visually integrated and/or oriented away from the Los Angeles River, as required by the proposed Specific Plan and Design Guidelines.
	1. Locate loading facilities so that docks and doors do not dominate the river frontage and are screened from the river. 2. Situate loading areas so as not to interfere with on-site pedestrian and bicycle circulation to and from the river corridor. When feasible, separate loading areas from areas that are used for public entrances.	**No Conflict.** Loading facilities would be oriented toward the center of the site to avoid dominating the Los Angeles River frontage. Further, landscaping in compliance with the Landscaping Guidelines Plant Palette and the California Native Plant Library would be provided at the perimeter as screening. Proposed loading areas would be situated within the footprint of the studio campus, rather than along public streets, adjacent to the Los Angeles River.
	Shared Parking. Encourage shared parking agreements to minimize the amount of area dedicated to parking.	**No Conflict.** Parking accommodations for the Project would be consolidated into multi-story garages or underground structures, thereby minimizing the amount of site area dedicated to parking.
Public ROW (Obj. 5)	1. Design cul-de-sacs, street ends, vacated streets, and remnant street width to provide pocket parks which can serve as gateways to the river while also assisting in the treatment and infiltration of stormwater as well as dry-weather run-off.	**Not Applicable.** The Project Site contains no fragment of a street segment or vacated ROW.
	2. Design parkways and traffic circles to assist in the treatment and infiltration of stormwater as well as dry-weather runoff. See the City's Green Street Standard Plans for reference.	**No Conflict.** The proposed Specific Plan would provide for a landscaped parkway along Radford Avenue with Landscaping Guidelines Plant Palette and the California Native Plant Library provided at the perimeter as screening and appropriate stormwater infiltration infrastructure.

Source: Eyestone Environmental, 2025.

In addition, in compliance with efforts to revitalize the Los Angeles River under the RIO District Ordinance and per the LARRMP and the County's Landscaping Guidelines, the Project would help beautify and enhance public access to the Los Angeles River and Tujunga Wash. As shown in Figure II-19 in Section II, Project Description, the Project would provide new and enhanced landscaping within portions of the proposed development areas located to the west of the Tujunga Wash and Los Angeles River within the eastern portion of the Project Site.

Based on the above, the Project would not conflict with the objectives of the River Design Guidelines.

(vii) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not strict regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all are appropriate in every case. As detailed below, the Project would not conflict with those applicable Citywide Design Guidelines related to aesthetics (including scenic resources).

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

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the Project would provide pedestrian enhancements consistent with the LARRMP, including a new multi-modal bridge, the Radford Bridge, extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street, which would provide public pedestrian and bicycle access to the Tujunga Wash and include a new private studio-related vehicle access drive, as well as public ramps and/or stairs to provide direct access to the Los Angeles River trail system. Project lighting would incorporate low-level exterior lights on the buildings and along pathways for enhanced security and wayfinding purposes for use on a human scale. Low-level lighting to accent signage would be featured on the Project Site and architectural features, and landscaping elements would be incorporated within the Project Site to provide for efficient and effective lighting solutions that minimize light spill-over to neighboring buildings and the surrounding area.

The Project would also enhance the public areas along all Project Site frontages through sidewalk improvements, including the widening of sidewalks in some areas, consistent with Mobility Plan standards; installation of new street trees and landscaping, lighting, wayfinding signage; and provision of pedestrian amenities, such as benches, which would encourage the Project to actively engage with streets and public space at human scale. The Project would provide a 17-foot-wide setback area along the western edge of the North Lot and a 10-foot-wide setback area along the western edge of the South Lot along Radford Avenue, as well as a

15-foot-wide setback area along the southeastern edge of the South Lot along Colfax Avenue. A protected bikeway would also be provided along Radford Avenue, consistent with the Department of City Planning's 2010 Bicycle Plan. The Project would also upgrade the crosswalks and bus stops around and in close proximity to the Project Site and provide designated pedestrian entrances to the Project Site. Moreover, the Project would include safe, delineated pathways for pedestrians throughout the Project Site. Therefore, the Project would not conflict with Citywide Design Guideline 3.

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

As discussed above, the Project Site is located in an urbanized area that is developed with a mix of land uses. The Project incorporates site planning and architectural strategies to complement the scale and character of the surrounding neighborhood. As discussed in Section II, Project Description, of this Draft EIR, the proposed Specific Plan height subareas (Subareas A through D) with specified height limits and limited height allowances would be established to regulate building heights throughout the Project Site, with taller maximum heights concentrated toward the center of the Project Site, away from Project Site's edges. The proposed Specific Plan would also establish setback and stepback requirements to recognize and respect the scale of the surrounding areas. Except for Subarea A, which would establish a 60-foot height limit, the Project Site would be subject to a sitewide height limit of 75 feet as measured from Project Grade (i.e., 595 feet AMSL for the North Lot and 610 feet AMSL for the South Lot). This height limit would be augmented with additional height allowances permitted in a limited portion of Subareas B and C. The height subareas and associated setbacks and stepbacks would limit future development to concentrate building height towards the center of the Project Site and away from the existing commercial and residential uses, as well as the Los Angeles River and the Tujunga Wash. Further, a 20-foot stepback from the property line of the South Lot along Radford Avenue, Colfax Avenue and the public alley would be required for any new building that exceeds 75 feet in height. Collectively, these building restrictions and design elements would allow Project development to remain sensitive to surrounding uses. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The overall design strategy of the Project and the proposed Specific Plan is to maintain existing studio uses on the Project Site, develop new facilities integral to the future needs and demands of the entertainment industry, and integrate the Project Site with the adjoining public streets, Los Angeles River, and Tujunga Wash. The design intent of the proposed Specific Plan is to functionally integrate new development within the Project Site such that maximum permitted height is generally located toward the center of the Project Site and shifted away from the Project Site perimeter. The Project design also includes infrastructure and landscaping improvements in the public areas, such as pedestrian/bicycle path improvements

on Radford Avenue, as well as other potential improvements within the alley south of the Project Site (parallel to Ventura Boulevard). The Project also proposes a Sign District that would regulate signage, in conjunction with applicable LAMC signage provisions, in terms of placement, scale, color, illumination, and material. Project signage would be integrated with and complement the overall aesthetic character of on-site development and would be designed to enhance the studio character of the Project Site. All of these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located within an urbanized area and does not contain any large expanses of natural resources. Two large drainage features, the Los Angeles River and Tujunga Wash, which are modified concrete channels that support very limited aquatic habitat and are ecologically disconnected from the rest of the Project Site by the approximately 15-foot-tall concrete side walls, pass through the Project Site. With respect to trees, a total of 609 trees and palms were inventoried on the Project Site. Removal of protected private trees or street trees requires a Tree Removal Permit through the City's Department of Public Works, Urban Forestry Division, and replacement trees are required at a ratio that is consistent with the Tree Protection Ordinance. The Project would comply with the existing replacement ratio of 4:1 for permitted protected tree removals and the replacement ratio of 2:1 for street tree removals. Therefore, the Project would not conflict with Citywide Design Guideline 8.

(ix) County of Los Angeles River Master Plan:

As discussed above, the LARRMP and RIO District represent one of the four planning overlays for the County's LA River Master Plan and the Project would overall be consistent with the LARRMP and RIO District. In addition, the Project would also support applicable goals of the County's Los Angeles River Master Plan described above. In particular, the Project would support the goal to reduce flood risk by improving the drainage system within the Project Site, which would reduce drainage flows. As the Project would provide improved bicycle and pedestrian access and connections to the Los Angeles River, it would also support the goals to provide trails and equitable access to the river corridor. Finally, with the improved drainage systems on-site that would improve water quality, the Project would also support the goal to provide for clean water.

(viii) Conclusion

Based on the above, overall, the Project would not conflict with applicable zoning and other regulations governing scenic quality. In addition, in accordance with SB 743, aesthetic impacts associated with consistency with zoning and regulations related to scenic quality would not be considered significant.

(2) Mitigation Measures

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered 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 during Project construction can have the potential to generate light spillover to off-site sensitive land uses. Under the Project, construction activities would occur in accordance with the provisions of the LAMC Section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. While the majority of Project construction would occur during daylight hours, there is a potential, based on the Project's anticipated construction hours, that construction could occur in the evening hours and require the use of artificial lighting. Outdoor lighting sources, such as floodlights, spot lights, 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 a given area of the Project Site. In addition, all stationary construction lighting would comply with the requirements set forth in CALGreen Code described above. Furthermore, in accordance with Project Design Feature AES-PDF-2, above, construction lighting would be directed away from residential properties, and the public right-of-way. In addition, Project Design Feature AES-PDF-1, above, provides for the erection of a 10-foot-tall fence along the Project Site perimeter, where construction activities are present. Therefore, light resulting from construction activities would not create a new source of substantial light to adversely affect nighttime views in the area.

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, as set forth in Project Design Feature AES-PDF-1, temporary construction fencing would be placed along the periphery of the Project Site, where construction activities would occur 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 of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. In addition, in accordance with SB 743, aesthetic impacts associated with light and glare during construction of the Project would not be considered significant.

(b) Operation

The analysis of lighting below is based on the Lighting Report prepared by Francis Krahe & Associates and included in Appendix C.1 of this Draft EIR. In accordance with City policy, also provided below is an analysis of the potential for the Project to shade public gathering spaces.

As discussed above, the Lighting Report evaluated both illuminance (light trespass) and luminance (glare) associated with continued operation of the Project Site with studio uses. Lighting sources that were considered include exterior building lighting, outdoor security and other point sources, and illuminated signs. Illuminance and luminance associated with outdoor stationary lighting and signs were evaluated separately below.

(i) Exterior Lighting

Illuminance

Future exterior lighting for the Project would be regulated by the lighting requirements of the proposed Specific Plan, which are incorporated as project design features above. These project design features limit the light from stationary sources at adjacent sensitive use properties by defining performance requirements that limit light trespass onto an adjacent property with a residential use or other sensitive use.

As set forth in the project design features above, new stationary lighting that may be installed as a part of the Project within 50 feet of the Project Site boundary will be limited in height (no greater than 30 feet above grade), limited to 2,500 lumens maximum, and designed such that the light source will be directed down and shielded from off-site view. In addition, all stationary lighting located beyond 50 feet of the Project Site boundary will not exceed 20,000 lumens maximum. Furthermore, all lighting for above-grade parking structures and exterior building terraces will be limited by the project design features to prevent light spill from

any building or parking structure roof deck or terrace, or from any open elevations of any building or parking structure within 50 feet from the Project Site.

In addition, the Project's signs would be designed to include energy use and lighting control systems that comply with Energy Code Sections 130.3 and 140.8. Specifically, Project Design Features AES-PDF-15 through AES-PDF-17, above, specify that Project signs be controlled with a photocontrol in addition to an automatic time-switch control or an astronomical time-switch control, include dimmers to reduce the sign's power during nighttime hours, and that the maximum allowed lighting power for internally illuminated signs will not exceed the product of the illuminated sign area and 12 watts per square foot. Therefore, with these project design features, the Project would satisfy the exceptions to Energy Code Section 140.7(a). Accordingly, the Project's signs are not subject to the light trespass and glare requirement of CALGreen Code Section 5.106.8. Accordingly, the Lighting Report does not further analyze the Project sign's light trespass or glare with respect to the CALGreen Code and Energy Code requirements for outdoor lighting.

With implementation of these project design features, the light trespass illuminance at the Project Site property line or at the centerline of the adjacent public right-of-way would be limited to a maximum of 0.74 fc, which would comply with CALGreen Code and the Energy Code. As light degrades exponentially as distance increases, the residential properties or other sensitive use properties located beyond the centerline of the adjacent public right-of-way surrounding the Project Site would receive less light or less than 0.74 fc. Therefore, the light trespass illuminance from stationary lighting would be well below the threshold of 2.0 fc and, thus, would not cause a substantial change in the existing lighting conditions at adjacent sensitive use properties. Similarly, exterior lighting visible at other sensitive use properties located at greater distances from the Project Site than the Monitoring Sites would receive substantially less light than the Monitoring Sites.

The LAMC regulations listed in Chapter IX, Article 3, Division 1, Section 93.0117(b) of the LAMC and included above in Subsection 2.a.(2) apply only to "any stationary exterior light source." Film production lighting in outdoor production activity areas and basecamp areas is temporary lighting and is not regulated by the LAMC. In addition, the existing ambient lighting conditions at the Project Site are already influenced by temporary outdoor lighting for film production. Furthermore, outdoor production activity areas and basecamp areas would be reduced under the Project. Specifically, the existing outdoor production area is approximately 1,0450,000 square feet, and the proposed area would be reduced to approximately 840,000 square feet. The existing basecamp area is approximately 376,000 square feet, and the proposed area would be reduced to approximately 331,000 square feet. Therefore, no substantial increase in light trespass would result from the temporary lighting used during production activities.

As described above, the LAMC lighting regulations for the RIO were established in 2014, and do not account for the operation of the studio since the 1920s. In addition, the RIO Ordinance identifies maximum illuminance at the "site boundary" but does not take into account the unique nature and boundaries of the Project Site. Portions of the concrete-lined Los Angeles River and Tujunga Wash traverse the Project Site in dedicated easement areas. Furthermore, given that the RIO Ordinance was adopted in 2014, well after operation of the studio began, both existing and historical lighting levels at the Project Site exceed the lighting standards in the RIO Ordinance. Future building lighting, production lighting, event lighting, and other mobile light sources would be of a similar nature to support the existing functioning film studio adjacent to the Los Angeles River and Tujunga Wash. Given that the proposed outdoor production and basecamp areas would be reduced in comparison to existing conditions, the extent of mobile lighting sources would be less than existing conditions. Thus, future light trespass illuminance from these lighting sources would be similar to or less than the existing lighting conditions at the boundary of the Los Angeles River and Tujunga Wash. Furthermore, the areas where lighting would exceed the RIO standards include the existing film studio facilities, which is an industrial/commercial use property within the Project Site and do not include natural habitat or residential uses.

As discussed above, the Project includes a proposed Specific Plan to establish land use regulations for the Project Site to ensure consistent implementation of development standards throughout the Project Site in recognition of the Project Site's unique characteristics, including the particular nature and demands of an existing studio use and specific constraints posed by the Project Site's location, which are not experienced at other sites. These are included as project design features above. With implementation of these project design features, exterior lighting impacts would not exceed existing conditions. In addition, in accordance with SB 743, aesthetic impacts associated with light and glare during operation of the Project would not be considered significant.

Exterior Lighting—Glare

Exterior lighting that may be installed as a part of the Project would also be regulated by the proposed Specific Plan and the regulations of CALGreen Code, which include requirements to limit the visible luminance from stationary lighting that may be visible from adjacent residential use properties or other sensitive use.

The proposed Specific Plan, which incorporates the project design features presented above, includes requirements that all exterior lighting that may be installed as a part of the Project within 50 feet of the Project Site boundary be limited in height (no greater than 30 feet above grade), limited to 2,500 lumens maximum, and designed such that the light source must be directed down or away from the Project Site property line and shielded from off-site view. All exterior lighting located beyond 50 feet of the Project Site boundary may not exceed a maximum of 20,000 lumens. Furthermore, the proposed Specific Plan and project design

features require that all light sources must include a BUG rating of B=0, U=0, G=0, which specifies no backlight (B=0), no up light (U=0), and no Glare (G=0). Accordingly, all exterior stationary lighting sources would not be visible from adjacent sensitive use properties and would not present a new source of glare. Similarly, the requirements of the proposed Specific Plan would result in no visible stationary light sources that may impact drivers' visibility. Therefore, no significant impacts to drivers' visibility with respect to the CVC would occur as a result of operation of the Project. **In addition, in accordance with SB 743, aesthetic impacts associated with light and glare during operation of the Project would not be considered significant.**

(ii) Signs

Illuminance

The Lighting Report analyzes the proposed signs shown in Figures II-26 through II-29 of Section II, Project Description. As discussed above, the evaluation of illuminance as High, Medium, and Low describes the relative amount of light effects at a residentially zoned property at night. Illuminance greater than 3.0 fc, the maximum sign illuminance permitted by the LAMC, is evaluated as "High." Illuminance greater than 1.0 fc but less than 3.0 fc is evaluated as "Medium." Illuminance less than 1.0 fc is evaluated as "Low."

In accordance with the project design features above, signs that are illuminated would operate at maximum luminance of 6,000 cd/m^2 during the day and 300 cd/m^2 at night with a smooth transition from day maximum luminance to night maximum luminance beginning 45 minutes prior to sunset and concluding at sunset, and from night maximum luminance to day maximum luminance 45 minutes prior to sunrise and concluding at sunrise.

The sign lighting analysis evaluated the illuminance (fc) from the signs leaving the Project Site toward residentially zoned properties, as described in Figure IV.A-25 on page IV.A-51 with respect to the maximum light illuminance threshold of 3.0 fc. To provide a conservative analysis, all external Project signs were analyzed as operating simultaneously at a maximum luminance of 100 cd/m^2, all white, at night, and all internal Project signs are analyzed as operating simultaneously at a maximum luminance of 300 cd/m^2, all white, at night. The signs would not operate in all white mode in practice; however, all white mode would produce the maximum light illuminance and, therefore, was assumed to represent a conservative analysis.

As shown in Table IV.A-9 on page IV.A-104, the maximum vertical illuminance associated with the signs ranges from a minimum of 0.1 fc at vertical plane VP-N1 to a maximum of 2.8 fc at vertical plane VP-S4. Thus, all light trespass illuminance at the residentially zoned or other sensitive use property lines from signs would be less than the maximum 3.0-fc threshold.

Table IV.A-9
Project Signs Light Illuminance (fc)

Vertical Plane	Illuminance (fc)			Code Threshold (3.0 fc)
	Maximum	Minimum	Average	
VP-E1	1.10	0.00	0.34	Less than threshold
VP-E2	2.50	1.00	2.15	Less than threshold
VP-E3	2.50	0.40	1.55	Less than threshold
VP-E4	1.30	0.10	0.52	Less than threshold
VP-E5	1.50	0.10	0.57	Less than threshold
VP-N1	0.10	0.00	0.05	Less than threshold
VP-W1	1.80	0.20	0.83	Less than threshold
VP-W2	2.60	1.10	1.90	Less than threshold
VP-W3	1.00	0.10	0.47	Less than threshold
VP-W4	1.30	0.30	0.68	Less than threshold
VP-S1	0.20	0.00	0.06	Less than threshold
VP-S2	0.30	0.00	0.14	Less than threshold
VP-S3	0.30	0.00	0.04	Less than threshold
VP-S4	2.80	0.10	0.47	Less than threshold

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

As such, proposed signage would not create an adverse lighting effect at the Monitoring Sites or at other adjacent residentially zoned properties or sensitive use properties. Since light degrades rapidly with distance, residentially zoned properties or other sensitive use properties more distant from the Project Site than the Monitoring Sites would receive substantially less light illuminance than the Monitoring Sites. Therefore, the lighting impact from the Project signs at residentially zoned properties or other sensitive use properties would be less than significant.

Glare

As discussed above, the evaluation of High, Medium and Low contrast describes the perception of how bright a visible object appears in comparison to the surrounding objects within any given field of view. “High,” “Medium,” and “Low” contrast are terms used to describe the effect of the contrast ratios (the ratio of maximum luminance to the average within a field of view) of greater than 30:1, between 10:1 and 30:1, and below 10:1, respectively. Luminance contrast ratios above 30:1 are generally uncomfortable for the human eye to perceive. High contrast, greater than a 30:1 contrast ratio, indicates a potential glare condition.

Potential glare from the Project signs was evaluated by calculating the contrast ratio, which is the ratio of the maximum sign luminance compared to the existing measured average luminance in Table IV.A-10 on page IV.A-106. Table IV.A-10 summarizes the measured average luminance at each Monitoring Site along with a calculation of the comparison of the proposed Project signs maximum nighttime luminance located within 100 feet from Project property line and/or RIO boundary to the existing measured average luminance to determine the contrast ratio.

As outlined in the project design features above, all signs located within 100 feet from the Project property line and/or RIO boundary will not exceed 100 cd/m^2 nighttime luminance, and all signs located beyond 100 feet from the Project property line and/or RIO boundary will not exceed 300 cd/m^2 nighttime luminance.

As shown in Table IV.A-10, the maximum Project sign nighttime luminance of 100 cd/m^2 would result in Low contrast ratios for eight out of the nine Monitoring Site locations (M-E1, M-E2, M-NE1, M-NE2, M-S1, M-W1, M-W2, and M-NW1), ranging from a minimum of 0.2:1 to a maximum of 2.9:1. At one of the Monitoring Sites, M-NE3, the Contrast Ratio is 14.4, which indicates a Medium contrast and no glare condition because the sign lighting contrast ratio is less than 30:1, which indicates a potential glare condition. Therefore, the potential glare impacts associated with Project signs at all Monitoring Sites and at adjacent residential use properties would be less than significant.

The measurement of existing average luminance at Monitoring Site M-NW1 is greater than 300 cd/m^2, and the maximum Project sign nighttime luminance results in a contrast ratio of 0.2:1 or less, which implies Low contrast and no glare. Therefore, the proposed Project sign maximum nighttime luminance at 100 cd/m^2 located within 100 feet from the Project property line and/or RIO boundary would not create a new source of glare as the contrast ratios would be less than 30:1.

Table IV.A-11 on page IV.A-107 summarizes the measured average luminance at each Monitoring Site along with a calculation of the comparison of the proposed Project signs maximum nighttime luminance located beyond 100 feet from Project property line and/or RIO boundary to the existing measured average luminance to determine the contrast ratio.

The maximum Project Sign nighttime luminance of 300 cd/m^2 results in Low contrast ratios for eight out of the nine Monitoring Site locations (M-E1, M-E2, M-NE1, M-NE2, M-S1, M-W1, M-W2, and M-NW1), ranging from a minimum of 0.7:1 to a maximum of 8.8:1. As outlined in the proposed Specific Plan and the project design features presented above, no signs at 300 cd/m^2 are allowed within 100 feet from the Project Site property line and/or the RIO boundary. Therefore, north-facing signs adjacent to the Tujunga Wash and facing toward Monitoring Site M-NE3 cannot exceed 100 cd/m^2 and, as such, would not cause glare.

Table IV.A-10
Project Signs Contrast Ratio—Signs Within 100 Feet of the Property Line

Monitoring Site	Existing Measured Luminance (cd/m^2)		Project Lighting Luminance		Evaluation
	Average	Maximum	Maximum	Contrast Ratio	
M-E1	73.8	1,524.0	100.0	1.4	Low contrast, no glare
M-E2	282.9	3,715.0	100.0	0.4	Low contrast, no glare
M-NE1	40.9	603.9	100.0	2.4	Low contrast, no glare
M-NE2	34.2	162.0	100.0	2.9	Low contrast, no glare
M-NE3	7.0	143.3	100.0	14.4	Medium Contrast, no glare
M-NW1	408.6	5,773.0	100.0	0.2	Low contrast, no glare
M-W1	37.8	495.0	100.0	2.6	Low contrast, no glare
M-W2	89.6	1,387.0	100.0	1.1	Low contrast, no glare
M-S1	144.5	2,752.0	100.0	0.7	Low contrast, no glare

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

The existing measured luminance at Monitoring Sites M-E2 and M-S1 are greater than 100 cd/m^2 and less than 300 cd/m^2, and the maximum Project Sign nighttime luminance results in a contrast ratio of 1.1:1 and 2.1:1, which is Low contrast and would not produce glare. In addition, the measurements of existing average luminance at Monitoring Site M-NW1 is greater than 300 cd/m^2, and the maximum Project Sign nighttime luminance results in a contrast ratio of 0.7:1 or less, which implies Low contrast and no glare.

Therefore, the proposed Project sign maximum nighttime luminance at 300 cd/m^2 for all signs located beyond 100 feet from Project Site property line and/or RIO boundary would not create a new source of glare with contrast ratios less than 30:1. Since light degrades rapidly with distance, sensitive uses more distant from the Project Site than the Monitoring Sites would receive substantially less light than the Monitoring Sites.

In addition, in accordance with SB 743, aesthetic impacts associated with light and glare during operation of the Project would not be considered significant.

(iii) Glare Analysis for Roadways, California Vehicle Code

Night

A measured brightness within the driver's field of view of less than 10 fL may occur at night. The maximum Project Sign luminance at night is 300 cd/m^2. Calculating the equivalent

Table IV.A-11
Project Signs Contrast Ratio—Signs Beyond 100 Feet of the Property Line

Monitoring Site	Existing Measured Luminance (CD/M^2)		Project Lighting Luminance		Evaluation
	Average	Maximum	Maximum	Contrast Ratio	
M-E1	73.8	1,524.0	300.0	4.1	Low contrast, no glare
M-E2	289.2	3,715.0	300.0	1.1	Low contrast, no glare
M-NE1	40.9	603.9	300.0	7.3	Low contrast, no glare
M-NE2	34.2	162.0	300.0	8.8	Low contrast, no glare
M-NW1	408.6	5,773.0	300.0	0.7	Low contrast, no glare
M-W1	37.8	495.0	300.0	7.9	Low contrast, no glare
M-W2	89.6	1,387.0	300.0	3.4	Low contrast, no glare
M-S1	144.5	2,752.0	300.0	2.1	Low contrast, no glare

Source: Francis Krahe & Associates, Inc., Radford Studio Center Project Lighting and Glare Technical Report, 2024.

maximum luminance by converting to English units from metric units: 300 cd/m^2 equals 87.5 fL. Because the Project signs would be limited to a maximum nighttime luminance of 300 cd/m^2, or 87.5 fL, the Project Sign maximum luminance would not exceed 87.5 fL, which is substantially less than (approximately 17.5 percent of) the 500 fL maximum threshold in the CVC where the minimum brightness in the driver's field of view is less than 10 fL. Therefore, at night the Project signs within drivers' field of view would not exceed the 500 fL threshold and would not introduce a new source of substantial glare, and impacts would be less than significant.

For Project signs located beyond the driver's 10-degree field of view, the maximum luminance is permitted to increase under the CVC. For example, light sources located 15 degrees from the center line of the driver's field of view would be limited to a maximum of 1,000 fL (500 fL plus 100 times the angle (5 degrees) = 1,000 fL). The maximum Project Sign luminance is 300 cd/m^2 or 87.5 fL at night, which is substantially less than (approximately 8.75 percent of) the maximum threshold in the CVC for those Project sign locations at 15 degrees from the center of the driver's field of view. Therefore, at night, the Project signs beyond the driver's 10-degree field of view would not exceed the 1,000-fL threshold and would not introduce a new source of substantial glare.

Twilight

The Project signs were also evaluated during twilight (the transition period from day to night, from sunset to 45 minutes after sunset, and night to day, from 45 minutes before sunrise

to sunrise). Sunlight increases gradually from the minimum brightness at sunrise to maximum brightness at mid-day, and then decreases gradually to the minimum brightness at sunset. Therefore, the minimum ambient sunlight occurs after sunset or before sunrise. However, in order to analyze the most conservative, low level sunlight conditions, the Lighting Report adjusted the time frame for the minimum ambient luminance condition of 10 fL to sunset and at sunrise, extending the duration of minimum sunlight. At sunset the ambient sunlight would be greater than the minimum values after sunset during twilight, and at sunrise the luminance would be greater than the minimum during the time preceding sunrise. At sunset or sunrise, the minimum luminance values within the driver's field of view would be above the minimum nighttime values (10 fL) due to the light from the setting or rising sun. However, to maintain a conservative analysis, the evaluation assumed the minimum luminance within the driver's field of view would be less than 10 fL from sunset until sunrise. Therefore, the maximum luminance during twilight would remain at 500 fL. The maximum luminance permitted by the CVC of 500 fL, which, converting to metric units, equals 1,579 cd/m^2, is far greater than the proposed 300 cd/m^2 maximum Project Sign luminance.

The Project signs are designed to operate at 300 cd/m^2 (87.5 fL) maximum luminance, from sunset to sunrise. In accordance with the project design features presented above, at 45 minutes prior to sunset, the Project signs are specified to begin to transition from the maximum daytime luminance of 6,000 cd/m^2 to the maximum nighttime luminance of 300 cd/m^2. This transition will be completed no later than sunset to avoid potential high contrast, glare conditions. Similarly, in accordance with the project design features presented above, the Project signs are specified to transition from the nighttime maximum luminance of 300 cd/m^2 to the daytime maximum luminance of 6,000 cd/m^2, beginning no earlier than sunrise. Therefore, the Project signs would not exceed a maximum luminance of 300 cd/m^2 from sunset to sunrise, which converts to a maximum of 87.5 fL, less than the maximum permitted luminance of 500 fL. Thus, the Project signs would not exceed the threshold of 500 fL and, as such, would not introduce a new source of substantial glare during twilight.

Day

The evaluation of the Project signs during the day (45 minutes after sunrise until 45 minutes before sunset) compares the daytime ambient brightness to the maximum sign brightness stipulated by the CVC during full sun conditions and overcast sky conditions. CVC Section 21466.5 referenced above states that "The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 fL or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line-of-sight and the light source."

During the day, sunlight with clear sky conditions or light overcast conditions provides sufficient illuminance to generate surface brightness greater than 10 fL and up to 1,200 fL on the least reflective surfaces, such as roadway pavement. Utilizing the value of 10 fL as the minimum within the driver's field of view, the maximum allowable brightness would be 1,000 times 10 fL, or 10,000 fL. Because the Project signs will be limited to a maximum luminance of 6,000 cd/m^2 (1,751 fL) during the daytime, Project signs would not exceed 6,000 cd/m^2 (1,751 fL) during the day and, as such, would operate at substantially less than (approximately 18 percent of) the maximum luminance stipulated by the CVC. Therefore, the Project signs would not create a new source of substantial glare during the daytime with clear sky or light overcast conditions.

Severe storms, heavy cloud cover, or other atmospheric conditions may occur during the day, which may cause the minimum brightness within the driver's field of view to be less than 10 fL. As part of the project design features presented above, the Project signs will include an electronic control system to reduce the sign luminance from 6,000 cd/m^2 (1,751 fL) to 300 cd/m^2 (87.5 fL) maximum when the ambient sunlight falls to illuminance values similar to night, less than 100 fc. During the day, when storms, cloud cover, or other low ambient sunlight conditions occur and when the ambient sunlight is less than 100 fc, the Project signs will transition from the daytime 6,000 cd/m^2 (1,751 fL) to 300 cd/m^2 (87.5 fL) maximum thereby ensuring that the sign brightness remains less than the maximum brightness stipulated by the CVC. Therefore, the Project signs would not create a new source of substantial glare during daytime periods with storm or severe overcast weather conditions and would not exceed 87.4 fL, which is substantially less than (approximately 17.5 percent of) the 500 fL maximum allowed by the CVC during overcast conditions.

Based on the above, the Project sign luminance would be substantially less than the CVC standard. **In addition, in accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant.**

(iv) Shading

With regard to shading, as discussed above, there are no public parks or public gathering spaces located adjacent to the Project Site. The closest outdoor public gathering space is Moorpark Park located a block away (approximately 400 feet) from the Project Site and separated from the Project Site by Moorpark Street, the Tujunga Wash, and apartment buildings. In addition, as shown in the Shadow Study included in Appendix C.2, shadows that extend beyond the Project Site boundary would be limited to the early morning hours, and these shadows would generally be limited to the adjacent street. Therefore, the Project would not shade public gathering spaces for more than 90 minutes between the hours of 10:00 A.M. and 2:00 P.M. during the winter solstice. **In addition, in accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant.**

(2) Mitigation Measures

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045.[30] The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, aesthetics impacts do not vary substantially over the course of relatively short time frames (i.e., the 20-year term of the Development Agreement). Rather, all development would comply with the Conceptual Site Plan shown in Figure II-8 of Section II, Project Description, of this Draft EIR, as well as the requirements of the proposed Specific Plan and Sign District, which are also described therein. In addition, in accordance with the project design features presented above, throughout their duration, all construction activities will be screened by fencing, and construction lighting will be directed away from sensitive uses. As such, impacts associated with construction would be less than significant. Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 13 related projects have been identified in the vicinity of the Project Site through 2028, the Project's anticipated buildout year. These related projects include 11 development projects and two infrastructure improvement projects. The related projects comprise a variety of uses, including residential, commercial, and recreational uses, as well as mixed-use developments incorporating some or all of these uses.

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[30] *As noted above, construction of the proposed Radford Bridge may be completed after 2028.*

(1) Impact Analysis

(a) Scenic Vistas

As discussed in the Project-level analysis under Threshold (a) above, the Project (primarily the upper levels of the proposed buildings) would have a range of visibility from 13 of the 15 viewpoints analyzed (the exceptions being Viewpoints 1 and 2 where views of the Project would be blocked by intervening topography). However, as described and shown in Figure IV.A-2 through Figure IV.A-14 above, the Project would not reduce or block existing views of scenic resources available from these viewpoints or reduce the field of view of the scenic vistas available from these viewpoints. As shown in Figure III-1 of Section III, Environmental Setting, of this Draft EIR, the closest related project is Related Project No. 1, located to the west of the Project Site along Radford Avenue, while the other related projects are located a minimum of approximately 0.25 miles from the Project Site. In addition, the BOE and LADWP improvements that comprise Related Project Nos. 12 and 13, respectively, would not result in new buildings that would have the potential to impact scenic vistas. As with the Project, the related projects would be located in an urbanized area within the valley floor, below the foothills of the Santa Monica Mountains. As such, as with the Project, the related projects would not project up into the views of the Santa Susana or San Gabriel Mountains or substantially change views of the San Fernando Valley skyline from existing public scenic vistas in the Project vicinity. **Therefore, cumulative impacts associated with scenic vistas would be less than significant.**

(b) Scenic Quality

Based on their location, the related projects are generally subject to the same City scenic quality goals, objectives, policies, and regulations as the Project (although some of the LAMC light regulations differ depending on the proposed land use). Any conflicts with scenic quality regulations resulting from implementation of the related projects would be largely site- and development proposal-specific. As such, plan conflicts identified for the Project in the Project-level analysis under Threshold (c) above would not be expected to combine with conflicts associated with any of the related projects to create cumulative conflicts with applicable scenic-quality-related goals, objectives, policies, and regulations. Furthermore, within the immediate Project vicinity, the related projects include residential and commercial uses and infrastructure improvements. These uses and infrastructure improvements are consistent with existing uses within the Project vicinity and would not be expected to result in impacts related to scenic quality. In addition, as with the Project, all of the related projects would be subject to City development review, and similar to the Project, most, if not all, of the related projects would be subject to CEQA review, where any substantial conflicts with applicable scenic quality goals, objectives, policies, and regulations would be required to be resolved (through either changing the related projects and/or implementing mitigation to reduce any significant environmental effects associated with any conflicts). As with the Project, each of the related projects would also be required to comply with LAMC zoning and development standards, including those

related to density, height, setbacks, and landscaping requirements. Therefore, the related projects would not be anticipated to conflict with goals, policies and objectives or regulations related to scenic quality. **Therefore, cumulative impacts related to conflicts with applicable zoning and other regulations governing scenic quality would be less than significant.**

(c) Light and Glare

As discussed above, as with the Project, the related projects would be located in an urbanized area where various sources of light are already present. In addition, the related projects would comply with LAMC requirements regarding lighting, which would ensure that sensitive uses would not be impacted by lighting. In addition, with regard to glare, the related projects' proposed uses would be compatible with other development in the urban environment. Within the immediate Project vicinity, the related projects include residential and commercial uses and infrastructure improvements. These uses and infrastructure improvements are consistent with existing uses within the Project vicinity and would not generate substantial sources of glare. Furthermore, future development projects would be subject to discretionary review to ensure that significant impacts associated with light and glare would not occur. Therefore, cumulative light and glare impacts from development of the Project and the related projects would be less than significant.

(d) Shading

The closest related project to the Project Site is Related Project No. 1, located to the west of the Project Site along Radford Avenue. The remaining related projects are located a minimum of approximately 0.25 miles from the Project Site and, as such, would not have the potential to result in cumulative shading impacts. As discussed above, there are no places of outdoor public gathering, such as a public park or public plaza adjacent to the Project Site. The closest public gathering area is Moorpark Park located to the northwest of the Project Site across Moorpark Street and the Tujunga Wash and separated from the project by intervening apartment buildings. This park is located even farther from Related Project No. 1 than the Project Site. **As such, cumulative impacts associated with shading would be less than significant and the Project's contribution to shading impacts would not be cumulatively considerable.**

(2) Mitigation Measures

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

In accordance with SB 743, aesthetic impacts associated with the Project would not be considered significant.