

IV. Environmental Impact Analysis

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A. Aesthetics

1. Introduction

This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community, identifies applicable laws, regulations, guidelines and policies relating to scenic quality and lighting, and evaluates potential aesthetic impacts related to consistency with these plans and regulations, as well as potential impacts associated with light and glare.

a. 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.

b. Light and Glare

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

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

2. Environmental Setting

a. Regulatory Framework

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

- Senate Bill 743
- Assembly Bill 1560
- California Scenic Highways
- California Historic Parkways
- California Building Standards Code
- California Vehicle Code
- City of Los Angeles General Plan
 - Framework Element
 - Conservation Element
 - Transportation Element (Mobility Plan 2035)
 - Land Use Element (Westchester–Playa del Rey Community Plan)
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) Senate Bill 743 (2013)

Senate Bill (SB) 743, codified within the Public Resources Code (PRC) Section 21099 et. seq., states that “Aesthetic (...) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” (PRC Section 21099(d) (1)). If a project meets these conditions, aesthetic impacts associated with the project would not be considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and

light and glare) as outlined in the CEQA Guidelines Appendix G. However, ZI No. 2452 requires that projects in transit priority areas (TPAs) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality.

Evaluation of a project's physical impacts associated with aesthetics is not required for an exempt project. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in the Initial Study included as Appendix A 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.
- “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.
- “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.

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 is located on a site listed as a TPA by ZIMAS and by Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).^{1,2} However, given that the floor area ratio for Option 1 is 0.6:1 and the floor area ratio for Option 2 is 0.5:1, the Project does not meet the definition of an employment center, which as discussed above, requires a floor area ratio of 0.75:1. As such, the Project does not meet the definition for the exemption from the analysis of aesthetics, and, thus, an analysis of aesthetics has been provided in this section of this Draft EIR.

(b) Assembly Bill 1560

Assembly Bill 1560, codified in 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 20 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

¹ City of Los Angeles, *Zone Information and Map Access System (ZIMAS) Parcel Profile Report for Assessor Parcel No. (APN) 4125010016*, accessed September 15, 2025.

² SCAG, *2050 TPAs—SCAG Region*, https://hub.scag.ca.gov/datasets/10edc64279ff4ebeb99a191161416422_0/explore?location=34.060478%2C-118.227490%2C14.77, accessed September 15, 2025.

California's natural scenic beauty by identifying those portions of the state highway system, which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. The only State Scenic Highway within the City of Los Angeles includes portions of the Topanga Canyon State Scenic Highway (State Route [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 (California 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). The Arroyo Seco Parkway is approximately 14 miles northeast of the Project Site.

(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, (which correspond to the Light Trespass Illuminance recommendations within the Illuminating Engineering Society of North America (IESNA) 10th Edition Handbook, Table 26.4. 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 footcandles). The Project Site is within the City of Los Angeles, which 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.

(2) Local

(a) City of Los Angeles General Plan

(i) 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.³ 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.⁴ Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).⁵

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.⁶ "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.⁷ The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.G, Land Use and Planning, of this Draft EIR. The Project's consistency with the Framework Element is provided in Section IV.G Land Use

³ City of Los Angeles Department of City Planning, *General Plan Framework Element*, originally adopted December 11, 1996, and readopted August 8, 2001.

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

⁵ 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.

⁶ 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.

⁷ City of Los Angeles Department of City Planning, *General Plan Framework, Executive Summary*, originally adopted December 11, 1996, and readopted August 8, 2001.

and Planning, of this Draft EIR. To the extent the policies included therein relate to the aesthetics/scenic quality, Project consistency with these policies is analyzed later in this section.

(ii) 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."⁸ To the extent the policies included in the Conservation Element relate to aesthetics, Project consistency with these policies is analyzed later in this section.

(iii) Transportation Element (Mobility Plan 2035)

Mobility Plan 2035 (adopted in 2016) provides an inventory of City-designated scenic highways. Scenic highways depicted in the City have special controls for protection and enhancement of scenic resources. The Mobility Plan 2035 also includes Scenic Highway Guidelines for those designated scenic highways for which there is no adopted scenic corridor plan.

(iv) Land Use Element (Westchester–Playa del Rey 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 City's Westchester–Playa del Rey Community Plan (Community Plan) area of the City of Los Angeles (City).⁹ Adopted on April 13, 2004, the Community Plan covers the area generally bounded by Centinela Avenue, La Brea Avenue, the City of Los Angeles boundaries with unincorporated County of Los Angeles, the City of Inglewood, the City of El Segundo, Dockweiler State Beach, Ballona Creek, Bay Street

⁸ City of Los Angeles Department of City Planning, *General Plan Conservation Element*, originally adopted September 26, 2001.

⁹ City of Los Angeles, *ZIMAS Parcel Profile Report for APN 4125010016*, accessed September 15, 2025.

and Jefferson Boulevard.¹⁰ The purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the Westchester–Playa del Rey community within the larger framework of the City.¹¹ The Westchester–Playa del Rey Community Plan is one of four Westside community plans currently being updated by the City of Los Angeles Department of City Planning.

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

A few of the Community Plan's objectives and policies outside of the Urban Design chapter are also related to aesthetic issues. In addition to an evaluation of Project consistency with applicable Community Plan design policies and standards of the Urban Design chapter, an evaluation of Project consistency with other applicable aesthetics-related objectives and policies of the Community Plan is provided in the impact analysis later in this section.

(b) Los Angeles Municipal Code

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

(i) Lighting Regulations

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

- Chapter I, Article 2, Section 12.21 A.5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than 3 foot-candles above

¹⁰ City of Los Angeles, *Westchester–Playa del Rey Community Plan*, adopted April 13, 2004.

¹¹ City of Los Angeles, *Westchester–Playa del Rey Community Plan*, adopted April 13, 2004.

ambient lighting, as measured at the property line of the nearest residentially zoned property.

- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that are in the field of view.
 1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
 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.¹²

(ii) Citywide Design Guidelines

Adopted in 2019, the Citywide Design Guidelines (Guidelines) establish 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.

¹² *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.*

- 360 Degree Design
 - Guideline 4: Organize and shape projects to recognize and respect surrounding context.
 - Guideline 5: Express a clear and coherent architectural idea.
 - Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
 - Guideline 7: Carefully arrange design elements and uses to protect site users.
- Climate-Adapted Design
 - Guideline 8: Protect the site's natural resources and features.
 - 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

As indicated previously, the Project Site is located in the Westchester–Playa del Rey Community Plan area of the City.¹³ As shown in Figure II-1 and Figure II-2 in Section II, Project Description, of this Draft EIR, the approximately 18-acre Project Site is bounded by West Arbor Vitae Street to the south, residential uses and surface parking to the east, and South Airport Boulevard to the west. In addition, as shown in Figure II-2, Interceptor Street bounds the northern portion of the Project Site on the west, north, and east. The Project Site is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings used for maintenance facilities and office uses, surface parking, and accessory structures, including a carwash, solar panel canopies, and fueling station canopies. The perimeter of the Project Site is secured with chain link

¹³ City of Los Angeles, *ZIMAS Parcel Profile Report for APN 4125010016*, accessed September 15, 2025.

fence and concrete block walls, and two on-site double-sided advertising billboards located along South Airport Boulevard within the Project Site. The Project Site is relatively flat with elevations ranging from approximately 100 feet to 110 feet above mean seal level (AMSL).¹⁴

The Project Site is located in a fully urbanized area that includes a mix of low-rise buildings containing industrial, residential and commercial uses and surface parking lots. Directly north of the Project Site, across Interceptor Street, are properties zoned R3-1 with multi-family residential uses. To the east of the Project Site are properties zoned R3-1 and MR-1, which include single-and multi-family residential uses and a car rental facility/lot. To the west of the Project Site, across South Airport Boulevard, are properties zoned R1-1 and LAX (as an indication of inclusion in the Los Angeles International Airport Specific Plan), which include surface parking to the majority of the west of the Project Site and single-family residential to the upper northwestern portion. To the south, across West Arbor Vitae Street, are properties zoned LAX and MR-1, which include a motel, a restaurant, and the LAX People Mover maintenance yard. The LAX People Mover is expected to have elevated tracks up to 50 feet in height running along 96th Street and will connect the Metro K Line to LAX. It is currently under construction with completion expected in 2026.

The closest local elevated terrains with potential views of the Project area include the top of the Westchester Bluffs located approximately 2.1 miles to the north, a high point in Playa del Rey along Manchester Boulevard located approximately 2.75 miles to the northwest, the Santa Monica Mountains approximately eight miles to the north, and hills of Palos Verdes located approximately 10 miles to the south. Most views within the Project area, and most views of the Project area from the first two of these high points, are blocked by intervening development given the relatively flat topography of the area. The Project Site is indistinguishable from the rest of the Los Angeles Basin as seen from the Santa Monica Mountains and the Palos Verdes hills given both the great distances and lack of high-rise buildings on the Project Site.

(1) 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 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

¹⁴ Leighton Consulting, Inc., *Geotechnical Exploration Report Proposed Industrial Development 9000 Airport Boulevard, City of Los Angeles California, February 22, 2024*. See Appendix IS-3.1 of the Project’s Initial Study, contained in Appendix A of this Draft EIR.

panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

As discussed in the Initial Study included in Appendix A of this Draft EIR, panoramic views of visual resources (such as the Santa Monica Mountains) are limited in the Project vicinity due to the predominantly flat terrain of the Project area and the relatively dense, intervening development that blocks such long-range, expansive views. In addition, there are no focal views of visual resources across the Project Site.

(2) Scenic Resources

Scenic resources within Appendix G of the CEQA Guidelines 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 only State Scenic Highway within the City includes portions of the Topanga Canyon State Scenic Highway (SR-27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park. Views of the Project Site are not available from this scenic highway due to distance (located more than 15 miles from the Project Site) and intervening urban development.

(3) Scenic Quality

To help identify the existing scenic quality of the Project Site and local vicinity, including any scenic resources that may be located on the Project Site, photographs were taken of the Project Site from the adjacent streets and some of the adjacent land uses as identified in Figure IV.A-1 through Figure IV.A-5 on pages IV.A-14 through IV.A-18. As shown in the photos, landscaped setbacks, cinder block walls, and chain link fences are visible on the Project Site perimeter. and large surface parking lots with one-story structures and canopies are visible within the interior of the Project Site from South Airport Boulevard and West Arbor Vitae Street (see Figure IV.A-2 and Figure IV.A-3 on pages IV.A-15 and IV.A-16). From Interceptor Street and from the residential uses along Interceptor Street, mature landscaping and a cinder block wall obstruct internal views of the Project Site (see Figure IV.A-4 and Figure IV.A-5 on pages IV.A-17 and IV.A-18).

As discussed above, the existing on-site buildings do not represent historic buildings, the existing on-site trees are not protected trees, and there are no gardens, natural landforms, waterbodies, or other on-site elements that could be considered scenic resources on the Project Site. Still, as evident in the photographs, the landscaping and rows of trees along the Project Site's northern and eastern boundaries, and the street trees along the



Figure IV.A-1
Photograph Locations Key Map



Photo 1 (From northwest of Project Site Looking southeast at the northwest corner of the Project Site)



Photo 2 (From west of Project Site Looking east at the west portion of the Project Site)



Photo 3 (From southwest of Project Site Looking east at the southwest corner of the Project Site)

Figure IV.A-2
Photographs of the Existing Project Site (Photos 1-3)



Photo 4 (From southwest of Project Site Looking northeast at the southwest corner of the Project Site)



Photo 5 (From south of Project Site Looking north at the south Portion of the Project Site)



Photo 6 (From southeast of Project Site Looking northwest at the southeast Portion of the Project Site)

Figure IV.A-3
Photographs of the Existing Project Site (Photos 4-6)



Photo 7 (From north of Project Site Looking south at the north Portion of the Project Site)

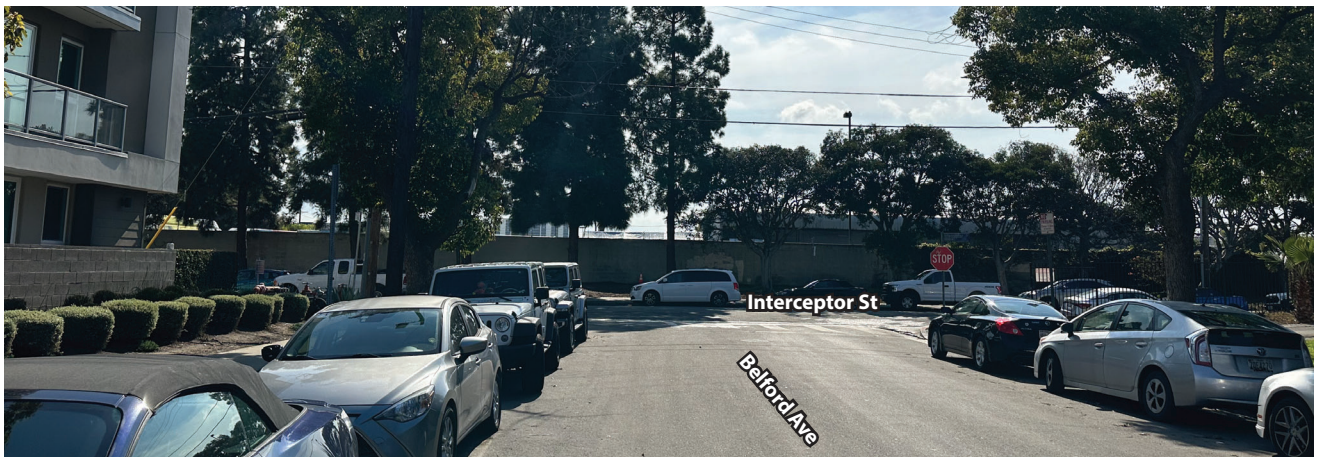


Photo 8 (From north of Project Site Looking south at north Portion of the Project Site)



Photo 9 (From northeast of Project Site Looking west at the northeast Portion of the Project Site)

Figure IV.A-4
Photographs of the Existing Project Site (Photos 7-9)



Photo 10 (From E of Project Site Looking W at the E Portion of the Project Site)

Figure IV.A-5
Photographs of the Existing Project Site (Photos 10)

Project Site's South Airport Boulevard and West Arbor Vitae Street frontages, do provide some aesthetic value and help visually buffer the Project Site from the existing adjacent streets and land uses.

As indicated previously, the Project Site is located within the Westchester–Playa del Rey Community Plan area and is subject to both the scenic quality-related goals, objectives, policies and standards of the Community Plan and LAMC development regulations and zoning requirements. The Project Site is designated as Limited Manufacturing and is zoned as [T][Q]M1-1 (Limited Industrial, Height District No. 1). All uses located in the M1 Zone and within Height District No. 1 are restricted to a maximum floor area ratio of 1.5:1. Buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5:1, the Project Site's 789,989 square feet of lot area/buildable area would permit up to 1,184,984 square feet of floor area. Height District No. 1 within the M1 Zone normally imposes no height limitation, however, the Project Site is subject to the Airport Hazard Area height limit of 80 feet as established by the Airport Land Use Commission.

The Project Site is also subject to LAMC "Q" Conditions established by Ordinance No. 167,642. The Project Site's "Q" Conditions generally include provisions to setbacks, landscaping, and non-scenic quality-related issues (i.e., noise conditions and traffic congestion). Specifically, with regard to setbacks, an approximately 15-foot landscaped setback shall be provided along portions of the northern and western boundaries of the Project Site along Interceptor Street; the existing seven-foot landscaped setback along Interceptor Street on the eastern boundary shall be preserved and maintained; a minimum 10-foot landscaped setback shall be provided along both South Airport Boulevard and West Arbor Vitae Street; and a minimum five-foot setback shall be provided along the eastern property line contiguous to the R3-1 zone to include trees. No new building or structure shall be built within 50 feet of the northerly or easterly property line adjacent to or across the street from an R3-1 zoned lot. There is also a Project Site "Q" Condition requiring that Project lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas (this condition shall not preclude the installation of low-level security lighting).

(4) Light and Glare

Existing nighttime light levels at the Project Site are considered moderate given that the Project Site contains and is surrounded by urban uses, including shipping businesses/warehouses, rental car businesses/lots, and employee parking lots serving LAX, several of which operate 24 hours a day. Additionally, there is a block-sized LAX employee parking lot (LAX Employee Lot East) located across South Airport Boulevard to the west of the Project Site. Most of the Project Site's surface parking lots and those associated with the LAX employee parking lot to the west have tall light standards (light poles) that are lit during nighttime hours. Moreover, there are existing streetlights along the Project Site's

frontages along South Airport Boulevard, West Arbor Vitae Street, and Interceptor Street, as well as vehicle headlights on adjacent streets. The Project Site also currently generates a moderate level of daytime reflective glare from the existing on-site uses, including the solar panel canopies and the rental cars parked throughout the on-site surface parking lots, and moderate nighttime glare from the aforementioned nighttime lighting. The nearest off-site receptors considered sensitive to light and glare include apartments to the north and east, across Interceptor Street; the Skyways Hotel to the south, across West Arbor Vitae Street; single-family uses to the east; and several single-family residential units at the northwest corner of South Airport Boulevard and Interceptor Street to the west.

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 existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality;¹⁵ or

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

¹⁵ 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 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.

The Initial Study, included as Appendix A of this Draft EIR, determined that the Project would result in a less than significant impact related to scenic vistas (Threshold (a)) and no impacts related to scenic resources within a scenic highway (Threshold (b)). Specifically, as discussed in the Initial Study, panoramic views of visual resources are limited in the Project vicinity due to the predominantly flat terrain of the Project area and the relatively dense, intervening development that blocks such long-range, expansive views. Additionally, the Project would not block focal views of visual resources. As such, development of the Project would not substantially or adversely affect a scenic vista. In addition, as discussed above and in the Initial Study, the Project Site is not visible from a State-designated scenic highway.

For the remaining thresholds (Threshold (c)) and Threshold (d)), the analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. For purpose of this analysis, the criteria from the L.A. CEQA Thresholds Guide that are relevant to the thresholds analyzed in detail herein are identified below.

(a) Scenic Quality

According to the L.A. CEQA 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.

(b) 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 interfere with the safe operation of a motor vehicle on adjacent streets. Accordingly, the analysis of this impact category includes consideration of the following factors set forth in the L.A. CEQA 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.

b. Methodology

(1) Scenic Quality

As discussed previously, the Project Site is located in the City of Los Angeles, which meets the definition of an urbanized area.¹⁶ 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, Conservation Element, and Community Plan), the LAMC (including the applicable "Q" Conditions), 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, programs and general land uses program specified in the plan or regulation.

(2) Light and Glare

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

¹⁶ 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).

c. Project Design Features

Section IV.H, Noise, of this Draft EIR includes Project Design Features NOI-PDF-1 through NOI-PDF-4 that involve screening of mechanical equipment and construction and retention of retaining walls. These project design features also pertain to aesthetics as screening would reduce visibility of mechanical equipment, and retaining walls would reduce visibility of construction activities and equipment within portions of the Project Site.

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

- AES-PDF-1:** During construction, the Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.
- AES-PDF-2:** Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from above. However, construction lighting will not be so limited as to compromise the safety of construction workers.
- AES-PDF-3:** All new outdoor lighting required for the Project will be shielded and directed downward and/or towards the interior of the Project Site such that the light source does not project directly upon any adjacent property.¹⁷
- AES-PDF-4:** Glass used in building facades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code, glass with coatings required to meet the Energy Code requirements will be permitted.
- AES-PDF-5:** Project signage will be integrated with the Project's architectural design.

¹⁷ The requirements of this PDF are similar to those that would apply to the Project Site "Q" Condition, which would require that Project lighting shall be directed onto the site, and no floodlighting shall be located as to be seen directly by the adjacent residential areas (this condition shall not preclude the installation of low-level security lighting).

d. Analysis of Project Impacts

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

As evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, the Project Site is fully developed with urban uses, and there are no scenic resources (i.e., historic buildings, gardens, protected trees, etc.) on the Project Site. There are rows of existing unprotected trees along the Project Site's northern and eastern boundaries and street trees along the Project Site's South Airport Boulevard and West Arbor Vitae Street frontages that would be preserved or replaced at a 1:1 or greater ratio under the Project (see the analysis under Threshold (c) below for further discussion). Panoramic views of visual resources are limited due to the predominantly flat terrain of the Project area and the relatively dense, intervening development that blocks such long-range, expansive views. Additionally, the Project would not block focal views of visual resources. Overall, due to the highly urbanized and built out surroundings, development of the Project would not substantially or adversely affect a scenic vista. **Therefore, as concluded in the Initial Study, the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.**

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

As evaluated in the Initial Study prepared for the Project and discussed above, the Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is Topanga Canyon State Scenic Highway, and views of the Project Site from Topanga Canyon State Scenic Highway are unavailable due to the long distance, relatively flat topography, and intervening urban development. **Therefore, as determined in the Initial Study, the Project would not substantially damage scenic resources within a state scenic highway and no impact would occur.**

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

(1) Impact Analysis

As previously discussed, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element and the Conservation Element, the Westchester–Playa del Rey Community Plan, the Citywide Urban Design Guidelines, the LAMC (including the zoning, "Q" Conditions applicable to the Project Site), and California Code of Regulations, Title 24,

as it relates to lighting). The Project's consistency with the general intent of these plans and regulations is provided below.

(a) City of Los Angeles General Plan

(i) Framework Element

Project consistency with applicable scenic quality-related goals, objectives and policies of the Framework Element is evaluated in Table IV.A-1 on page IV.A-26. To summarize, the Land Use Chapter of the Framework Element calls for accommodating new development in accordance with land use and design provisions of the General Plan Framework Long-Range Land Use Diagram and Table 3-1 (Policy 3.1.4), providing for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts (Policy 3.2.4), and districts that promote pedestrian activity and provide a quality experience for the City's residents (Goal 3L). The Project would be consistent with this goal and these policies, first and foremost, in that Option 1 would develop one industrial building comprised of up to 435,390 square feet of floor area with a FAR of approximately 0.6:1 and a maximum building height of 50 feet, while Option 2 would develop three industrial buildings comprised of up to 410,056 square feet of floor area with a FAR of approximately 0.5:1 and a maximum building height of 46 feet, both of which would be consistent with the existing Limited Manufacturing land use designation and [T][Q]M1-1 zoning of the Project Site (i.e., no General Plan Amendment or Rezone required) with approval of the proposed Conditional Use Permits (CUPs).¹⁸ As such, the Project would be generally consistent with the type, density, and height of development planned for the Project Site by the City. The Project would also be consistent with this goal and these policies in that it would not interfere with existing residential uses, and would introduce uses similar to and compatible with the mix of land uses on and surrounding the Project Site. The Project would also include design features, such as varied roof lines to break up the massing and create a more attractive and human-scale appearance and both setbacks and extensive landscaping along the street frontages and across from the existing adjacent land uses (i.e., single- and multi-family residential, hotel, car rental business, and an LAX employee parking lot), which would enhance the pedestrian experience and act as a buffer between the proposed industrial uses, the adjacent street, and the existing off-site land uses across those streets. In addition, the Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site and use the proposed building(s) and trees as buffers to the nearby residential uses. The Project would also improve the pedestrian experience within the Project Site and along the Project Site perimeter by providing between 94,400 square feet (Option 1) and 120,400 square feet (Option 2) of landscaped areas,

¹⁸ The proposed CUP is for a Vesting Class 3 Conditional Use Permit for a Major Development Project in the M1 Zone which creates more than 250,000 square feet of warehouse floor area.

Table IV.A-1
City of Los Angeles General Plan Goals, Objectives, and Policies Related to Scenic Quality

Objective/Policy	Would the Project Conflict?
Land Use Chapter	
Policy 3.1.4: Accommodate new development in accordance with land use and design provisions of the General Plan Framework Long-Range Land Use Diagram and Table 3-1.	No Conflict. According to the Framework Element's Long-Range Land Use Diagram–West/Coastal Los Angeles, the Project Site is not categorized as a Neighborhood District, Community Center, Regional Center, Downtown Center, or Mixed Use Boulevard, but it is in proximity to areas categorized as Community Center and Regional Center. Community Centers are typically characterized by a floor area ratio of 1.5:1 to 3.0:1 with 2- to 6-story buildings. Regional Centers are typically characterized by a floor area ratio up to 13:1 with high-rise buildings. As discussed in Section II, Project Description, of this Draft EIR, the Project would be comprised of one of two options that would each construct new industrial (i.e., warehouse) uses. Specifically, Option 1 would develop one industrial building comprised of up to 435,390 square feet of floor area with an FAR of approximately 0.6:1 and a maximum building height of 50 feet. Option 2 would develop three industrial buildings comprised of up to 410,056 square feet of floor area with an FAR of approximately 0.5:1 and a maximum building height of 46 feet. The area surrounding the Project Site is highly urbanized and includes a mix of low-rise (up to four-story) buildings containing industrial, residential, and commercial uses. Overall, the Project would generally be consistent with the type, density, and height of land uses in the Project vicinity, including the shipping and warehouse facilities associated with LAX. Therefore, the Project would not conflict with this policy.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	No Conflict. The Project Site is located in an urbanized area, and is surrounded by a mix of industrial, residential, and commercial uses. As discussed above under Policy 3.1.4, the Project would develop a maximum of up to 435,390 square feet of floor area with an FAR of approximately 0.6:1 and a maximum building height of 50 feet. A total of 37,860 square feet of existing commercial/industrial floor area uses and associated surface parking areas would be demolished. Therefore, the Project would not interfere with existing residential uses and would introduce uses similar to and compatible with the mix of land uses on and surrounding the Project Site. As discussed in Section II, Project Description, of this Draft EIR, both Project options would include design features, such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. Additionally, both Project options would provide extensive landscaping along the street frontages,

Table IV.A-1 (Continued)
City of Los Angeles General Plan Goals, Objectives, and Policies Related to Scenic Quality

Objective/Policy	Would the Project Conflict?
	which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. The Project would feature neutral colors, tinted glazing, and accent materials and, through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. Further, the pedestrian walkways throughout the Project Site would be integrated within landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. The Project would also orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site and use the proposed building(s) and trees as buffers to the nearby residential uses. Overall, the proposed development would be designed in an architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. Therefore, the Project would be consistent with the scale and character of the existing stable residential neighborhood and would enhance the character of the surrounding uses and not conflict with this policy.
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents.	No Conflict. The Project would improve the pedestrian experience within the Project Site and along Project Site perimeter. For Option 1, a total of 93,100 square feet of landscaped areas are proposed. For Option 2, a total of 120,400 square feet of landscaped areas are proposed. Under both options, the Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of the warehouse buildings including integration of fencing with planting along the perimeter of the site. The Project would include new landscaping and maintenance of existing landscaping along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard, as well as in the interior of the Project Site. These perimeter areas and Project Site improvements would also include lighting, short-term bicycle parking, and wayfinding signage. Therefore, the Project would not conflict with this goal.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.	No Conflict. The Project Site is located within a highly urbanized area and is currently developed with a car rental facility as well as associated maintenance and surface parking areas. The area surrounding the Project Site includes a mix of low-rise buildings containing industrial, residential, and commercial uses. The Project

Table IV.A-1 (Continued)
City of Los Angeles General Plan Goals, Objectives, and Policies Related to Scenic Quality

Objective/Policy	Would the Project Conflict?
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	would upgrade the quality of development by replacing a 37,860-square-foot rental car facility with a new, modern industrial center. Furthermore, the Project would retain or replace the existing walls and rows of trees in the Project Site's northern and eastern perimeters, would increase the number of on-site trees, and would replace any street trees to be removed on a 2:1 basis. The trees, along with compliance with the applicable "Q" Condition requiring that buildings be set back at least 50 feet from the northernly and easternly Project boundaries and the provision of landscaped setbacks along the Project Site's perimeter, would buffer the Project from the existing surrounding development. Furthermore, Project mechanical, electrical and roof top equipment would be screened and integrated into the architectural design (Project Design Feature NOI-PDF-1), and Project signage would be integrated with the Project's architectural design (Project Design Feature AES-PDF-5). The Project would also include improved lighting, wayfinding signage, and bicycle parking to enhance the experience and safety for all users. Overall, the uses and improvements proposed by the Project would enhance the quality of the Project Site and the area in the vicinity of the Project Site and the public realm. Therefore, the Project would not conflict with this goal and objective.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	No Conflict. Project signage would be integrated with and complement the overall aesthetic character of proposed on-site development and surroundings. Project signage could include general ground-level and wayfinding pedestrian signage around the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on site wall signs, murals, and graphics that are typical on industrial warehouse buildings. Project signage may include both externally and internally lit signs, with outdoor lit signage, in compliance with LAMC lighting requirements. Therefore, the Project would not conflict with this policy.
Open Space and Conservation Chapter	
Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	No Conflict. The Project is located on an infill site that has already been previously developed and contains limited landscaping. Therefore, the Project would not encroach into the City's natural settings. Existing landscaping within the Project Site includes 146 on-site non-protected trees and 14 street trees within the public right of way surrounding the Project Site. Under Option 1 the Project would remove 86 existing on-site trees and two street trees, and under Option 2, the Project would remove 85 existing on-site trees and five street trees.

Table IV.A-1 (Continued)
City of Los Angeles General Plan Goals, Objectives, and Policies Related to Scenic Quality

Objective/Policy	Would the Project Conflict?
	None of the trees that are proposed to be removed in either Project option are protected under the City's Protected Tree and Shrub Regulations (Ordinance No. 186,873). The Project would replace the removed on-site trees with approximately 118 new trees under Option 1 and 160 new trees under Option 2, including drought tolerant, disease resistant, and non-invasive California native. The Project would also include non-invasive ground cover through various species of agaves and aloes. In addition, in accordance with City requirements, the Project would replace the removed street trees at a 2:1 ratio with four new street trees under Option 1, and ten new street trees under Option 2. Therefore, the Project would not conflict with this objective.
Infrastructure and Public Services Chapter	
Goal 9P: Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. All lighting would comply with current energy standards and code requirements, while providing appropriate light levels needed to provide safety and to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties per Project Design Feature AES-PDF-3 and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Furthermore Project light and glare would be screened from the existing land uses across Interceptor Street to the north and the existing land uses to the east by the existing wall and rows of trees along the Project Site's northern and eastern boundaries. Additionally, per the applicable "Q" conditions, Project buildings would be set back from the Project northernly and easternly perimeter by at least 50 feet, which would further reduce Project-related light and glare visible from the adjacent streets and existing off-site uses. Therefore, the Project would not conflict with this goal.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse	No Conflict. The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would provide appropriate lighting levels for private outdoor lighting, parking areas, pedestrian areas, and security lighting and, as such, would not generate artificial light levels that are out of character with the surrounding area. Project construction lighting would

Table IV.A-1 (Continued)
City of Los Angeles General Plan Goals, Objectives, and Policies Related to Scenic Quality

Objective/Policy	Would the Project Conflict?
impact of lighting due to light pollution, light trespass, and glare.	be partially shielding by the existing block wall or a temporary wall on the northern and eastern property lines per Project Design Feature NOI-PDF-3, and Project construction and operational lighting sources would be shielded and/or directed toward Project Site areas to minimize impacts per Project Design Features AES-PDF-2 and AES-PDF-3. The Project would comply with all applicable LAMC lighting standards. Furthermore, glass used in building facades would be anti-reflective or treated with an anti-reflective coating to minimize glare per Project Design Feature AES-PDF-4. Therefore, the Project would not conflict with this objective.
Policy 9.40.6: Placement and location of street trees shall be coordinated with the placement of street lights.	No Conflict. Any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting. As part of the Project, a total of two existing street trees would be removed under Option 1 and five existing street trees would be removed under Option 2. However, in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500, the Project would replace the removed street trees at a 2:1 ratio. New street trees would be replaced at appropriate intervals with respect to street lighting, pursuant to the Bureau of Street Services, Urban Forestry Division requirement. Therefore, the Project would not conflict with this policy.
Section 15 - Land Form and Scenic Vistas	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	No Conflict. The Project Site is located in an area that is highly urbanized with built out surroundings. Therefore, publicly available scenic vistas of valued visual resources in the vicinity of the Project Site, including the Santa Monica Mountains and the Pacific Ocean, are unavailable or limited to roadways where there are gaps between existing buildings. As such, the Project would not obstruct or remove access to natural and scenic vistas and would not conflict with this objective.
^a City of Los Angeles, <i>General Plan Framework Element</i>, adopted December 11, 1996, re-adopted August 8, 2001. Source: <i>Eyestone Environmental</i>, 2025.	

streetscape improvements that enhance the pedestrian experience and create a cohesive visual identify, and both the maintenance of existing landscape along Interceptor Street,

West Arbor Vitae Street, and South Airport Boulevard, and replacement of any existing on-site trees and street trees at a 1:1 ratio or greater basis.

The Urban Form and Neighborhood Design Chapter calls for enhancing the livability of neighborhoods by upgrading the quality of development and improving the quality of the public realm (Goal 5A and Objective 5.5) and encouraging that signage be designed to be integrated with the architectural character of the building(s) and convey a visually attractive character (Policy 5.8.4). The Project would be consistent with this goal and policy in that, first and foremost, it would replace a 37,860-square-foot rental car facility with a new, modern industrial center. In addition, the Project would include extensive landscaping and new trees along all Project frontages, improved lighting, wayfinding signage, and bicycle parking to enhance the experience and safety for all users, and would both screen and incorporate into the building architectural design mechanical, electrical and roof top equipment (Project Design Feature NOI-PDF-1). Lastly, Project signage, which would be typical of warehouse developments in the vicinity, would be integrated with and complement the overall aesthetic character of proposed on-site development and surroundings, with outdoor lit signage to comply with LAMC lighting requirements.

The Open Space and Conservation Chapter calls for protecting the City's natural settings (Objective 6.1). The Project would be consistent with this objective as it would be an infill development on an already fully developed site surrounded by urban development and would not encroach into the City's natural setting. In addition, while the Project would remove 86 existing on-site trees and two street trees under Option 1 and 85 existing on-site trees and five street trees under Option 2, none of the trees to be removed are protected species. The Project would also replace the removed on-site trees with approximately 118 new trees under Option 1 and 160 new trees under Option 2, including drought tolerant, disease resistant, and non-invasive California native species, and would replace the street trees to be removed on a 2:1 basis. Thus, the number of trees on-site would increase upon completion of the Project.

The Infrastructure and Public Services Chapter calls for providing appropriate lighting while protecting/preserving the nighttime environment, views and driver visibility (Goal 9P), eliminating the adverse impact of lighting due to light pollution, light trespass and glare (Objective 9.40), and placing street trees in coordination with the placement of street lights (Policy 9.40.6). The Project would be consistent with this goal, objective and policy in that all Project lighting would comply with LAMC lighting standards, all Project construction and operational lighting would be shielded and directed downward and/or towards the interior of the Project to prevent light pollution and spillover onto the adjacent properties (Project Design Features AES-PDF-2 and AES-PDF-3), and glass used in building facades would be anti-reflective or treated with an anti-reflective coating to minimize glare (Project Design Feature AES-PDF-4). Furthermore Project light and glare would be screened from the existing land uses across Interceptor Street to the north and the existing land uses to the

east by the existing wall and rows of trees along the Project Site's northern and eastern boundaries, and Project building(s) would be set back from the Project northernly and easternly perimeter by at least 50 feet which would further reduce Project-related light and glare visible from the adjacent streets and existing off-site uses.

The Land Form and Scenic Vistas Section includes an objective calling for the protection and reinforcement of natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations. As indicated previously, the Project Site is located in an area that is highly urbanized with built out surroundings on relatively flat topography such that publicly available scenic vistas of valued visual resources in the vicinity of the Project Site, including the Santa Monica Mountains and the Pacific Ocean, are unavailable or limited to roadways where there are gaps between existing buildings. Thus, the Project would not obstruct scenic vistas.

Overall, the Project (both Options 1 and 2) would not conflict with applicable goals, objectives and policies of the Framework Element related to scenic quality.

(ii) Conservation Element

As discussed previously, the scenic quality-related goals, objectives and policies of the Conservation Element address the protection of important cultural and historical sites, other scenic resources, and natural and scenic vistas. As indicated previously, no cultural or historical resources are located on the Project Site, and the Project Site is currently fully developed with urban uses and does not contain other scenic resources, such as protected trees, gardens, water bodies, or natural landforms/open space. While the Project Site contains non-protected trees and the right-of-way along the public streets bordering the Project Site contain street trees, the Project would result in a net increase in on-site trees and would replace any street trees to be removed on a 2:1 basis. In addition, because the Project Site is located within a highly urbanized area with relatively flat topography, where the only natural and scenic vistas of the Santa Monica Mountains and Pacific Ocean available are down some of the existing north-south and east-west streets, and because the Project would not include mid- to high-rise development, the Project would not block natural and scenic vistas. Therefore, the Project would not conflict with the scenic quality-related goals, objectives and policies of the Conservation Element.

(b) Westchester–Playa del Rey Community Plan

As indicated previously, the Community Plan's General Plan land use designation of the Project Site is Limited Manufacturing while the zoning is [T][Q]M1-1. The Project would be consistent with the Community Plan's General Plan land use designation in that Option 1 would develop one industrial building comprised of up to 435,390 square feet of floor area with a FAR of approximately 0.6:1 and a maximum building height of 50 feet, while Option 2

would develop three industrial buildings comprised of up to 410,056 square feet of floor area with a FAR of approximately 0.5:1 and a maximum building height of 46 feet. Both of these options would be consistent with the Limited Manufacturing land use designation and [T][Q]M1-1 zoning of the Project Site (i.e., no General Plan Amendment or Rezone required) with approval of the proposed Conditional Use Permits (CUPs). As such, the Project would be generally consistent with the type, density, height and character of development planned for the Project Site by the Community Plan.

Furthermore, as provided in Table IV.A-2 on page IV.A-34, the Project would not conflict with the applicable goals, objectives and policies of the Westchester–Playa del Rey Community Plan related to scenic quality. To summarize, the Community Plan calls for future industrial development that is compatible with surrounding land uses (Objective 3.1), and improving the aesthetic quality and design of industrial areas and eliminating blight and detrimental visual impact on residential areas (Objective 3-3). The Community Plan also calls for the incorporation of urban design techniques in new industrial development, such as appropriate building orientation and scale, landscaping, buffering and increased setbacks to improve land use compatibility (Policy 3-3.1). The Project would be consistent with the above goals, objectives and policies. Specifically, the Project Site is an urban infill site currently developed with a rental car facility with maintenance and surface parking areas that would be replaced with a new modern industrial center that is generally similar to and compatible with the existing surrounding development. In addition, the Project would retain or replace the existing walls and rows of trees in the Project Site's northern and eastern perimeters, would increase the number of on-site trees, and would replace any street trees to be removed on a 2:1 basis, which along with compliance with the applicable "Q" Condition requiring that buildings be set back at least 50 feet from the Project boundaries and the provision of landscaped setbacks along the Project Site's perimeter, would buffer the Project from the existing surrounding development. Under the Project, mechanical, electrical, and roof top equipment would be screened and integrated into the building design (Project Design Feature NOI-PDF-1). Furthermore, Project signage would be integrated with the Project's architectural design (Project Design Feature AES-PDF-5). The Project would also include design features, such as varied roof lines, to break up the massing and create a more attractive and human-scale appearance. Finally, the Project would result in a net increase in on-site trees, would replace any street trees to be removed on a 2:1 basis, and would provide extensive landscaping along the Project Site's periphery, which together would enhance the pedestrian experience and help buffer the Project from the existing surrounding land uses.

Table IV.A-2
Westchester–Playa del Rey Community Plan Goals, Objectives and Policies Related to Scenic Quality

Goals/Objective/Policy ^a	Would the Project Conflict?
Land Use Policies and Programs—Industrial	
Objective 3-1: To provide locations for future industrial development and employment which are convenient to transportation facilities and compatible with surrounding land use.	No Conflict. The Project Site is already developed fully with existing commercial and parking lot uses on an urban infill site surrounded by streets and existing development, and the Project would replace the existing on-site uses with a new, modern industrial center. As such, the Project would represent urban infill development with generally similar commercial uses as already exist on the Project Site that are compatible with the existing adjacent development rather than new development on an undeveloped site that is inconsistent with the types of existing uses in the Project area. Therefore, the Project would not conflict with this objective.
Objective 3-3: To improve the aesthetic quality and design of industrial areas, eliminate blight and detrimental visual impact on residential areas, and establish a stable environment for quality industrial development. Policy 3-3.1: Require urban design techniques, such as appropriate building orientation and scale, landscaping, buffering and increased setbacks in the development of new industrial properties to improve land use compatibility with adjacent uses and to enhance the physical environment.	No Conflict. The area surrounding the Project Site includes a mix of low-rise buildings containing industrial, residential, and commercial uses. As discussed in Section II, Project Description, of this Draft EIR, the Project would consist of one industrial building (Option 1), or three industrial buildings (Option 2). Both Project options would include design features such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. Additionally, both Project options would provide extensive landscaping along the street frontages, which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. The building design would feature neutral colors, tinted glazing, and accent materials, and through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. Further, the Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site, and use the proposed building(s) and trees as buffers to the nearby residential uses. Overall, the Project would be designed to complement and enhance the built environment in the surrounding neighborhood. In addition, the Project would retain or replace the existing walls and landscaping along the Project Site's northern and eastern boundaries. The Project would also increase the number of on-site trees and would replace any street trees to be removed on a 2:1 basis, which along with compliance with the applicable "Q" Condition requiring that buildings be set back at least 50 feet from the northern and eastern Project boundaries and the provision of landscaped setbacks along the Project Site's perimeter, would buffer the Project from the existing surrounding development. Furthermore, roof top equipment would be screened and integrated into

Table IV.A-2 (Continued)
Westchester–Playa del Rey Community Plan Goals, Objectives and Policies Related to Scenic Quality

Goals/Objective/Policy ^a	Would the Project Conflict?
	the building design (Project Design Feature NOI-PDF-1), and Project signage would be integrated with the Project's architectural design (Project Design Feature AES-PDF-5). Therefore, the Project would not conflict with this objective and policy.
^a City of Los Angeles, <i>Westchester–Playa del Rey Community Plan</i> , adopted April 13, 2004. Source: <i>Eyestone Environmental</i> , 2025.	

(c) 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 Citywide Design Guidelines applicable to visual quality. See Section IV.G, Land Use and Planning, of this Draft EIR for an analysis of Project consistency with the Citywide Design Guidelines from a land use perspective (addressing all 10 Citywide Design Guidelines).

Guideline 3: Design Projects to Actively Engage With Streets and Public Space and Maintain Human Scale.

Under both options, the Project would enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience. Specifically, the Project would include new landscaping, maintenance of existing landscaping, and replacement of any street trees to be removed on a 2:1 basis, along Interceptor Street, West Arbor Vitae Street, and South Airport Boulevard. The Project would also provide the landscaped setbacks required by the applicable “Q” Conditions, including provision of an approximately 15-foot landscaped setback along portions of the northern and western boundaries of the Project Site along Interceptor Street, preserving the existing seven-foot landscaped setback along Interceptor Street on the eastern boundary, providing a minimum ten-foot landscaped setback along both South Airport Boulevard and West Arbor Vitae Street, and providing a minimum five-foot setback along the eastern property line contiguous to the R3-1 zone to include trees. Furthermore, the Project would help maintain human scale in that it would be consistent with the types, density, and height of development permitted at the Project Site by the existing Limited Manufacturing General Plan land use designation and [T][Q]M1-1 zoning with approval of the proposed CUPs; and provide the 50-foot building setbacks required by the “Q” Conditions. Therefore, the Project would not conflict with Citywide Design Guideline 3.

Guideline 4: Organize and Shape Projects to Recognize and Respect Surrounding Context.

As indicated in the consistency analysis for Guideline 3 above, the Project would be consistent with the existing General Plan land use designation and zoning of the Project Site with approval of the proposed CUPs, would provide trees and other landscaped setbacks, and building setbacks to help buffer the Project from the existing surrounding uses, and would include streetscape and other pedestrian improvements, all of which would contribute to respecting the surrounding context. In particular, because the proposed uses would be setback from the adjacent streets and surrounding land uses, the visual impact of the proposed building(s) on the existing surrounding land uses and the pedestrians, bicyclists, and vehicular traffic using the adjacent streets would be minimized. The Project would also incorporate site planning and architectural strategies that would complement the scale and character of the surrounding neighborhood. Both Project options would include design features such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. The Project would feature neutral colors, tinted glazing, and accent materials, and through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. The Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site, and use the proposed building(s) and trees as buffers to the nearby residential uses. Lastly, as indicated previously, the Project would represent infill development on an already fully developed site surrounded by existing development, and would be consistent with the existing General Plan land use designation and zoning of the Project Site with approval of the proposed CUPs, such that the Project would be both consistent and compatible with the surrounding uses. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a Clear and Coherent Architectural Idea.

As previously discussed, the Project would transform the Project Site from a car rental facility with underutilized surface parking areas into a new, modern industrial center. Both Project options would include design features such as varied roof lines to break up the massing and create a more attractive and human-scale appearance. Additionally, both Project options would provide extensive landscaping along the street frontages, which would enhance the pedestrian experience and act as a buffer between the industrial uses and the street. The Project would feature neutral colors, tinted glazing, and accent materials, and, through the use of clerestory glazing and varied paint patterns, would further break up the mass of the building visually. The pedestrian walkways throughout the Project Site would be integrated with landscaped areas and pathways for employees while still providing for a space-efficient design for an active industrial warehouse center. Further, the Project would orient loading docks and vehicular circulation routes toward the central and western facing portions of the Project Site, and use the proposed building(s) and trees as buffers to the nearby residential uses. All of

these elements would be designed to complement the overall design of the Project Site, creating a coherent architectural idea. See also the consistency analysis for Guidelines 3 and 4 above. 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 in an urbanized area and is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site is relatively flat with limited ornamental landscaping and no natural landforms or water bodies. Also, while there are 146 on-site trees and 14 street trees within the public right-of-way surrounding the Project Site, none of these trees are considered protected by the City of Los Angeles' Protected Tree and Shrub Regulations (Ordinance No. 186,873). In addition, the Project would result in a net increase in on-site trees, and any street trees to be removed would be replaced at a 2:1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500. Therefore, the Project would not conflict with Citywide Design Guideline 8.

(d) Los Angeles Municipal Code

As previously discussed, the Project Site is zoned as [T][Q]M1-1 (Limited Industrial, Height District No. 1). The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District No. 1. All uses located in the M1 Zone and within Height District No. 1 are restricted to a maximum floor area ratio of 1.5:1.

As discussed in Section II, Project Description, of this Draft EIR, Option 1 would have a FAR of approximately 0.6:1 and a maximum height of 50 feet. Option 2 would have a FAR of approximately 0.5:1 and all three industrial buildings would have a maximum height of approximately 46 feet. Therefore, the Project would be consistent with the LAMC land use, FAR, and building height regulations for the Project Site.

With regard to setbacks, the M1 zone does not impose any setback requirements for commercial or industrial uses. However, the Project Site is subject to "Q" Conditions established by Ordinance No. 167,642, adopted in 1992, which changed the zone to [T][Q]M1-1 and incorporated "Q" Conditions in Section 2 of Ordinance No. 151,439.^{19,20,21} The Project Site's "Q" Conditions generally include provisions regarding setbacks, noise conditions,

¹⁹ Ordinance No. 167,642, adopted by the City Council on February 21, 1992.

²⁰ Ordinance No. 151,439, approved by the City Council on September 19, 1978.

²¹ Based on email correspondence with the Department of City Planning on November 17, 2023, although the [T] symbol is present in the zoning, there are no [T] conditions associated with the Project Site.

traffic congestion, and landscaping requirements. Specifically, with regard to setbacks, the “Q” conditions require the following:

- An approximately 15-foot landscaped setback shall be provided along portions of the northern and western boundaries of the Project Site along Interceptor Street.
- The existing seven-foot landscaped setback along Interceptor Street on the eastern boundary shall be preserved and maintained.
- A minimum ten-foot landscaped setback shall be provided along both South Airport Boulevard and West Arbor Vitae Street and a minimum five-foot setback shall be provided along the eastern property line contiguous to the R3-1 zone.
- No new building or structure shall be built within 50 feet of the northern or eastern property line adjacent to or across the street from an R3-1 zoned lot.

As shown in Table II-2 of Section II, Project Description of the Draft EIR the Project would meet or exceed the setbacks required by these “Q” Conditions.

With regard to other visually-quality related LAMC requirements, the Project would comply with LAMC street tree replacement requirements, lighting requirements, and landscape requirements set forth in the regulatory framework above, as may have been amended by the Project Site’s “Q” Conditions.

In summary, with approval of the requested discretionary actions, the Project would be generally consistent with the applicable visual quality-related zoning and other development regulations of the LAMC.

(e) Light Regulations (California Code of Regulations, Title 24, and LAMC)

As discussed above, Title 24 of the California Code of Regulations includes standards related to lighting that would be applied to the Project under Options 1 and 2. In general, Project lighting under Options 1 and 2 would be designed to provide efficient and effective lighting while minimizing light trespass from the Project Site, reducing sky-glow, and reducing glare reduction. Pursuant to Project Design Feature AES-PDF-3, all new outdoor lighting would be shielded and directed downward or towards the interior of the Project Site such that the light source would not project directly upon any adjacent property. In addition, Options 1 and 2 would adhere to minimum light intensities along pedestrian pathways, circulation ways, and paths of egress. Furthermore, the Project would comply with lighting control and cutoff requirements, power density allowances, and sign lighting controls. The Project would also adhere to the lighting standards regarding maximum allowable light levels, efficiency requirements, control requirements, light trespass requirements, and applicable LAMC lighting

standards (including the maximum illuminance level of 2 footcandles at the light-sensitive off-site uses). Thus, the Project would comply with applicable provisions included in Title 24.

(f) Conclusion

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

(i) Light

As indicated previously, the City's single-family residential illuminance threshold per LAMC Section 93.0177(b) is 2 footcandles. Lighting from a project has the potential to exceed this threshold if the proposed light sources are of high intensity, are unshielded, are not focused downward or inward, and/or are located immediately adjacent to or within close proximity of an adjacent property. The nearest off-site receptors considered light-sensitive are the multi-family and single-family residential uses to the east. Other sensitive receptors in the area include the apartment complexes to the north, across Interceptor Street; the Skyways Hotel to the south, across West Arbor Vitae Street; and several single-family residential units at the northwestern corner of South Airport Boulevard and Interceptor Street to the west.

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 NOI-PDF-3, above, provides for the retention of an existing wall along the Project Site perimeter, or replacement of the wall prior to construction if the wall is to be replaced, which would block all ground-level construction lighting from view. Therefore, light resulting from construction activities would not create a new source of substantial light to adversely affect nighttime views in the area.

(ii) Glare

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 NOI-PDF-3, the Project would retain or replace the existing walls located along the northern and eastern portions of the Project Site, which would screen construction activity from view at the ground level. If the wall is replaced, replacement would occur prior to construction activities occurring within that portion of the Project Site. In addition, the remainder of the Project Site would be screened by construction fencing as required by the Department of Building and Safety. Lastly, the generation of construction-related nighttime glare would be minimal, and Project construction activities would be largely restricted to daytime hours. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

(b) Operation

(i) Light

As discussed above, the Project would develop an industrial center under one of two options: Option 1 would develop one building comprised of up to 435,390 square feet of floor

area and a maximum building height of 50 feet; Option 2 would develop three buildings comprised of up to 410,056 square feet of floor area and a maximum building height of 46 feet. Under both options, the existing 37,860 square foot car rental facility, which includes large parking lots that are lit during nighttime hours, solar canopies, shade canopies and ancillary structures including a car wash, would be removed.

As shown in the conceptual site plans for Options 1 and 2 (i.e., Figure II-3 and Figure II-4 in Section II, Project Description, of this Draft EIR), the loading docks under both options, where nighttime lighting would be utilized the most, would be largely internal to the Project (i.e., would be largely blocked from direct line-of-site from the light-sensitive uses to the north and east by the proposed buildings). Furthermore, Project light sources would be shielded and/or directed inward to minimize light spill-over to neighboring properties (Project Design Feature AES-PDF-3), while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. In addition, under Project Design Feature NOI-PDF-4, the Project would retain or replace the existing masonry wall on the eastern property line, which would shield light from the residential uses to the east. In accordance with Project Design Feature NOI-PDF-2, under Option 1, a 14-foot-tall wall would be provided along the northern, western, and southern sides of the parked trailers, which would block transmission of light on the off-site light-sensitive receptors. New street and pedestrian lighting within the public ROW would be designed to minimize light and glare on adjacent properties in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. In addition, the existing double-sided lighted billboards on the Project Site would be removed. Project light and glare would also be screened from the existing land uses across Interceptor Street to the north and the existing land uses to the east by the existing wall and rows of trees along the Project Site's northern and eastern boundaries. Furthermore, per the applicable "Q" conditions, Project buildings (and the associated on-building lighting) would be set back from the Project Site northernly and easternly boundary by at least 50 feet. Lastly, while the Project would include the aforementioned lighting along with lit signage typical of industrial warehouse uses, the Project would comply with LAMC lighting requirements (including applicable restrictions on illuminance levels). Therefore, the Project would not result in light spillover of 2 footcandles or greater to occur.

Based on the above, potential impacts associated with lighting during construction and operation of the Project would be less than significant and no mitigation measures would be required.

(ii) Glare

The Project would include new on-site daytime reflective glare sources in the form of building windows and the windshields of cars and delivery trucks parked on-site, and new on-site nighttime glare sources in the form of Project lighting (including car and delivery truck headlights). However, as indicated previously Project glare sources would be screened from

the existing land uses across Interceptor Street to the north and the existing uses to the east by the existing wall and rows of trees along the Project Site's northern and eastern boundaries and would be partially screened along South Airport Boulevard and West Arbor Vitae Street by on-site landscaping and the existing and any required new street trees. Additionally, as indicated previously, most of the Project's high-intensity lighting (and thus most of the Project's nighttime glare sources) would be internal to the Project and blocked from view by the proposed buildings. Moreover, the Project would implement glare-reducing measures, including shielding Project lighting and directing this lighting downward and/or inward (Project Design Feature AES-PDF-3) and use anti-reflective materials or coatings for glass in building facades (Project Design Feature AES-PDF-4). Per the applicable "Q" conditions, Project buildings would be set back from the Project boundary by at least 50 feet which would further reduce Project-related glare visible from the adjacent streets and existing off-site uses. Furthermore, the Project would remove the existing on-site reflective daytime glare sources (i.e., solar canopies, parked rental cars and their windshields, etc.) and nighttime glare sources (i.e., lighting, including the rental car parking lot lighting) which currently generate moderate levels of glare. As indicated previously, the Project would be developed in a highly urbanized area that already has moderate levels of daytime reflective and nighttime glare. Lastly, the Project would comply with the CVC, which stipulates limits to the location of light sources that may cause glare and impair the vision of drivers.

Based on the above, potential impacts associated with glare during construction and operation of the Project would be less than significant and no mitigation measures would be required.

(c) Conclusion

Based on the discussion above, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area during construction or operation. Therefore, Project light and glare impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are four related projects in the vicinity of the Project Site, including Ramsgate Multi-Family at 8833 S. Ramsgate Avenue, the LAX Airfield & Terminal Modernization at LAX, a mixed-use residential development at 6136 W. Manchester Avenue, and an affordable residential project at 8819 Sepulveda Eastway. As shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, only one of these related projects, Ramsgate Multi-Family, is located within the immediate vicinity of the Project Site (i.e., approximately 350 feet northeast of the Project Site). The residential development at 6136 W. Manchester Avenue and the affordable residential project, are located approximately 0.48 mile and 0.5 mile, respectively, from the Project Site and are separated from the Project Site by intervening development, while the LAX Airfield & Terminal Modernization Project is located at LAX outside the 0.5-mile related projects radius of the Project Site and separated from the Project Site by intervening development.

(a) Regulations Governing Scenic Quality

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

(b) Light and Glare

Development of the Project, as well as the related projects in the area, would introduce new or expanded sources of artificial light. The Project and nearby related projects described above would include typical land uses for the Project area, which would not significantly alter the existing moderate level lighting environment currently experienced in the area. In fact, like the Project, the sites of each of the related projects are currently developed and currently emit artificial light. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the moderate ambient nighttime artificial light levels already present. Furthermore, the Project's and related projects' adherence to applicable City requirements regarding lighting and signage lighting would control the Project's potential artificial light sources to a sufficient degree so as not to be considered cumulatively considerable. In particular, like the Project, the related projects would include standard design features related to use of low-level lighting and shielding, as well as use of non-reflective

surfaces to minimize the potential for glare. **Therefore, cumulative light and glare impacts from development of the Project and the related projects would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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