IV. ENVIRONMENTAL IMPACT ANALYSIS

A. AESTHETICS

1. INTRODUCTION

Aesthetics, views, nighttime illumination, and daytime glare are related elements in the visual environment. *Aesthetics* generally refers to the identification of visual resources, the quality and character of what can be seen, and the overall visual perception of the environment. *View* refers to the visual access to important focal points or panoramic views from an area. *Nighttime illumination* addresses the extent to which a use's nighttime lighting (either interior or exterior) is visible from the surrounding area. *Glare* refers to the effect from reflective surfaces or lighting that may result in a safety or nuisance concern to drivers or surrounding uses.[1]

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing Visual Character

The Project Site is located in the Wilshire Community Plan Area of the City of Los Angeles and specifically within an area known as the Beverly Center-Cedars Sinai Regional Commercial Center. The visual character of the Project Site and surrounding area is that of a fully developed urban center, developed with a mix of medical, retail, commercial, and residential uses within the core and along roadway corridors leading to the center.

The major streets in the project vicinity include Beverly Boulevard, Third Street, La Cienega Boulevard, San Vicente Boulevard and Robertson Boulevard. Development along these streets is dominated by low-rise (one and two stories) and mid-rise (three to eleven stories) retail and commercial uses (see *Figure 3: Aerial Overview and Surrounding Uses*, in *Section II: Project Description*). The majority of commercial development fronting on the surrounding streets consists of low-rise buildings, and low-rise residential buildings dominate the nearby residential streets. Notable structures are the eight-story Beverly Center shopping mall, east of San Vicente Boulevard across from the Project Site; the Pacific Design Center, with a nine-story and a six-story buildings, located one-half mile north of the site; the ten-story Sofitel Hotel, on the north side of Beverly Boulevard across from the Beverly Center; the 15-story CSMC Medical Office Towers along Third Street; an 11-story apartment complex at San Vicente Boulevard and Burton Way; and the 11-story Pacific Theaters building west of the Project Site. *Figure: 17: Views of Urban Character: San Vicente Boulevard/Third Street, Figure: 18: Views of Urban Character: Third Street/George Burns Road, Figure: 19: Views of Urban Character: Robertson Boulevard/Gracie Allen Drive-Alden Drive, Figure: 20: Views of Urban Character: Beverly Boulevard/Robertson Boulevard, Figure: 21: Views of Urban Character: Beverly Boulevard/San Vicente Boulevard*, and *Figure: 22: Views of Urban Character: San Vicente Boulevard/Gracie Allen Drive* demonstrate views which typify the surrounding urban character.

[1] City of Los Angeles, *L.A. CEQA Thresholds Guide* (Los Angeles: City of Los Angeles, 2006).

LOOKING NORTHWEST TOWARD CSMC CAMPUS

FIGURE 17
VIEWS OF URBAN CHARACTER: SAN VICENTE BOULEVARD/THIRD STREET

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING NORTH TOWARD CSMC CAMPUS

FIGURE 18
VIEWS OF URBAN CHARACTER: THIRD STREET/GEORGE BURNS ROAD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING EAST TOWARD CSMC CAMPUS

FIGURE 19
VIEWS OF URBAN CHARACTER: ROBERTSON BOULEVARD/GRACIE ALLEN DRIVE-ALDEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHEAST TOWARD CSMC CAMPUS

FIGURE 20
VIEWS OF URBAN CHARACTER: BEVERLY BOULEVARD/ROBERTSON BOULEVARD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHWEST TOWARD CSMC CAMPUS

FIGURE 21
VIEWS OF URBAN CHARACTER: BEVERLY BOULEVARD/SAN VICENTE BOULEVARD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING WEST TOWARD CSMC CAMPUS

FIGURE 22
VIEWS OF URBAN CHARACTER: SAN VICENTE BOULEVARD/GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

The CSMC Campus is currently developed with several medical tower and mid-rise structures accommodating approximately 1.7 million square feet of medical office, research, and hospital space. The CSMC Campus structures include two 172-foot tall inpatient towers (the North and South Towers), the 185-foot tall Professional Tower, the 185-foot tall Saperstein Critical Care Tower, the 77-foot high Thalians Community Health Center, and a 177-foot tall research building. The Project Site is currently developed with the two-story, 80-foot high existing building at 8723 Alden Drive (the "Existing Building") and a surface visitor parking lot.

(2) Existing Viewsheds

According to the Wilshire Community Plan, the Project Site is not located within an important scenic viewshed. Due to the local topography and intensity of development in this commercial center, the opportunities for long distance views are limited. In all directions, except to the north, the long-range visual horizon is obstructed (and dominated) by existing man-made features in the foreground. Views to the north include limited intermittent long-range views of portions of the Santa Monica Mountain range known as the Hollywood Hills, with foreground views dominated by existing urban development.

The primary views of the Project Site are generally from within the CSMC Campus, in the immediate area bounded by Gracie Allen Drive and George Burns Road. Views of the Project Site from Beverly Boulevard or Robertson Boulevard are blocked or partially obstructed by adjacent buildings. The Project Site may be visible from vantage points from the Hollywood Hills and taller structures in the vicinity.

(3) Night Lighting

The CSMC Campus is located in a densely developed urban area. Commercial development and traffic along Beverly Boulevard, San Vicente Boulevard, and La Cienega Boulevard provide the greatest sources of local illumination. A major source of nighttime illumination in the immediate Project vicinity is the Beverly Center, adjacent and east of the CSMC Campus, which generates lighting from parking structures, exterior building lighting, and vehicle headlights. The Sofitel Hotel, located on Beverly Boulevard and several retail shopping centers, located on La Cienega Boulevard east of the CSMC Campus, are also sources of nighttime illumination and vehicle headlights. The nearest residences to the Project Site are located approximately 400 feet to the north on Bonner Drive in the City of West Hollywood.

Current sources of illumination on the CSMC Campus include street lighting, interior building lighting, lighting in parking structures, and security lighting. Sources of illumination from the Project Site are not highly visible and are not projected off-site since most of the lighting is shielded by the incorporation of directional lighting and the obstruction caused by surrounding structures. Windows from the Existing Building are tinted, thereby reducing the amount of light escaping from the building. Nighttime traffic entering and exiting the CSMC Campus does not significantly contribute to the existing illumination of the area because visiting hours are limited in the late evening hours.

(4) Daytime Glare

Glare may be caused directly by intense illumination or indirectly from the reflection of light off building surfaces. The presence of glare is frequently a subjective issue; however, when glare is excessive, it can cause discomfort, reduction of visibility, and even momentary loss of vision. A common source of adverse glare includes buildings with exterior facades incorporating highly reflective glass or mirror-like surface materials, which can reflect light when the sun is at a low angle. To a minor extent, evening glare can also be a factor due to vehicle headlights reflecting off reflective surfaces at street level.

The Existing Building has a brick and stucco façade with non-reflective glass windows. Due to the composition of building materials, the low height of the building and the proximity to taller surrounding structures, the Existing Building is not a source of significant glare.

b. Regulatory and Policy Setting

(1) Wilshire Community Plan

Often spoken of as the "mid-city" section of Los Angeles, the majority of the Wilshire Community Plan (the "Community Plan") area consists of gently sloping plains located about 6 miles westerly of downtown Los Angeles and also abutting the Cities of Beverly Hills and West Hollywood. The Community Plan area has a pattern of low to medium density residential uses interspersed with areas of higher density uses, including regional commercial centers.

The Community Plan does not identify any significant visual and/or scenic resources within or immediately adjacent to the Project Site. However, the Community Plan does provide generalized urban design policies and standards to ensure that projects, public spaces and rights-of-way incorporate specific elements of good design. The Community Plan acknowledges that a community's identity can be enhanced by individual projects through improvements to the streetscape and landscaping in public spaces and rights-of-way. Urban Design policies in the Community Plan generally seek to:[2]

- Orient commercial structures toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts.

- Provide for massing, proportion and scale of all new buildings and remodels that is at a pedestrian scale.

- Provide articulated architecture (and/or landscaping) that offers variation and visual interest, and enhances the streetscape by providing continuity and avoiding opportunities for graffiti.

- Utilize building materials to provide relief to untreated portions of exterior building facades and avoid large sterile expanses of building walls that are out of harmony with the surrounding neighborhood.

[2] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V.

- Design parking structures to be integrated with the design of the buildings they serve.

- Provide landscaping within surface parking areas.

- Provide appropriate exterior lighting to enhance pedestrian access and safety, while avoiding spillover on adjacent residential uses.

Generally, the Community Plan sets forth planning goals and objectives to maintain the community's visual character by: 1) improving the function, design and economic vitality of commercial areas; 2) preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance; and 3) improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

More specifically, the Community Plan includes the following objectives and policies addressing visual character in commercially designated areas:[3]

Objective 2-3: Enhance the visual appearance and appeal of commercial districts.

Policy 2-3.1: Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

The Community Plan also includes Urban Design guidelines that address individual land uses as well as the overall community design. The design policies establish a minimum level of design required in private projects and recommendations for public space improvements. Urban design policies applicable to the Project Site include:

Site Planning. Structures shall be oriented toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts by:

- Minimize the number of driveways/curb cuts which provide access from Major and Secondary Highways.

- Maximize pedestrian oriented retail and commercial service uses along street grade level frontages along commercial boulevards.

- Provide front pedestrian entrances for businesses which front on main commercial streets, with building facades and uses designed to promote customer interest, such as outdoor restaurants, and inviting public way extensions.

[3] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-3.

- Prohibit driveway openings, or garage or parking lot entries in exterior frontage walls of buildings, or between frontage buildings, unless the Los Angeles Department of Transportation determines that driveways cannot be practically placed elsewhere.

- Encourage pedestrian-only walkway openings, or entries (require at least one ground floor pedestrian entry), in exterior frontage walls of buildings, or between frontage buildings to plazas or courtyards with outdoor dining, seating, water features, kiosks, paseos, open air vending, or craft display areas.

- Provide fully landscaped and maintained unused building setback areas, and strips between driveways and walkways which allow safe and inviting pedestrian access to the rear of properties.

- Provide speed bumps for driveways which parallel walkways, or which are longer than 50 linear feet.

- Provide underground new utility service, including Internet services.

- Screen all mechanical and electrical equipment from public view.

- Screen all rooftop equipment and building appurtenances from public view.

- Require the enclosure of trash areas behind buildings for all projects.

Pedestrian-Oriented Building Design. In Regional Commercial Centers, the mass, proportion and scale of all new buildings and remodels must encourage pedestrian orientation. The design of all proposed projects must be articulated to provide variation and visual interest, and must enhance the streetscape and preclude opportunities for criminal activity and graffiti. Building materials should provide relief to untreated portions of building facades. The purpose of these provisions is to ensure that a project does not result in large sterile expanses of blank building walls, is harmonious with the surrounding neighborhood, and creates a stable environment with a pleasant and desirable character. The following policies are suggested to address pedestrian orientation:[4]

- For building frontages, require the use of offset building masses, recessed pedestrian entries, articulations, and surface perforations, or porticoes. Also require transparent windows (non-reflective, non-tinted glass for maximum visibility from sidewalks into building interiors). Also require recessed doors, entryways or courtyards, decorative planters, pedestrian scale murals or public art, mosaic tiles, or other means of creating visual interest, to break up long, flat building facades and free-standing blank walls greater than ten feet wide.

- Require each new building to have a pedestrian-oriented ground floor, and maximize the building area devoted to ground level display windows and display cases, store front glass,

[4] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-4.

doors, windows and other transparent elements on front facades to afford pedestrian views into retail, office, and lobby space, and those building surfaces facing rear parking areas.

- Require each new building to have building frontage on the floor immediately above the ground floor to be differentiated from the ground floor by recessed windows, balconies, offset planes, awnings, or other architectural details, but on buildings with pedestrian walkway openings, require continuity of an architectural feature on the facade, to retain continuity of the building wall at the ground floor.

- Provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with adjacent neighborhood architectural themes.

- Maximize the applications of architectural features and articulations to building facades.

- Locate surface and above-grade parking areas to the rear of buildings, with access driveways on side streets, or from rear streets where project buildings cover the majority of block areas.

- Integrate landscaping within pedestrian-friendly plazas, green space, pocket parks, and other open space compliments.

Parking Structures. Parking structures should be integrated with the design of buildings they serve through the following:[5]

- Design parking structure exteriors to match the style, materials, texture, and color of the main building(s).

- Landscape areas to screen parking structures and areas, which are not otherwise architecturally integrated with the main building(s).

- Utilize decorative walls and landscaping to buffer adjacent residential uses from parking structures.

Lighting.[6]

- Install on-site lighting along all pedestrian walkways and vehicular access ways.

- Shield and direct on-site lighting down onto driveways and walkways, away from adjacent residential uses.

Community Design and Landscaping. In addition to the establishment of Design Standards for individual projects, improvements to the streetscape and landscaping of public spaces, roadway medians, and other rights-of-way create an attractive and orderly public realm and contribute to

[5] City of Los Angeles, *Wilshire Community Plan* (Los Angeles: City of Los Angeles, 2001), Chapter V, p. V-5.
[6] *Ibid*.

the overall urban aesthetic of a community. It is the intent of these guidelines to improve the environment, both aesthetically and physically, as opportunities in the Wilshire Community Plan Area occur which involve public improvements or other public and/or private projects that affect public spaces and right-of-ways. Further, the Community Plan identifies the need to establish primary entry and individual commercial area identity improvements in the "Cedars Sinai-Beverly Center" vicinity on San Vicente Boulevard and Burton Way at the southern entry, and at Beverly Boulevard at the northern entry.

(2) Los Angeles Municipal Code

The Project Site is not subject to any special design or restricted height districts, except that the Project Site is within Height District 2, which permits structures up to six stories and 185 feet in height. Most properties surrounding the CSMC Campus are zoned Height District 1 with building height limits ranging between 45 and 75 feet.

As it pertains to this analysis, additional Los Angeles Municipal Code ("LAMC") requirements regulate such aspects of development as the design of parking facilities, and site plan design. Requirements regulating land use controls (that may, in turn, influence the visual character at the Project Site) were previously considered with past approvals for the CSMC Campus.

LAMC Sections 91.8101-F, 91.8904.1 and 91.1707-E, address graffiti removal and deterrence. Specifically, the first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property must be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. Additionally, portions of exterior non-glass walls may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least nine feet.

Also, the Project is subject to the City of Los Angles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits reflective surface areas and the reflectivity of architectural materials used. Further, outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties.

c. CSMC Campus Background and 1993 Approvals

The Original EIR considered the visual character (i.e., height, mass, architectural design and color) of the Master Plan development, and viewsheds. It was concluded that implementation of the Master Plan at the Project Site would change the visual character of development on the west side of George Burns Drive to that similar to the current visual character of Alden Drive-Gracie Allen Drive. The Master Plan anticipated that the architectural design for new buildings would incorporate architectural elements similar to the existing CSMC Campus medical towers and unify the visual character within the Property. It was determined that the Master Plan development would be consistent with the existing development patterns and character of the immediate area. Further, although the Master Plan development would increase the visibility of the Property relative to the surrounding area, due to the already limited viewing area of the

Project Site and context amongst existing urban development of similar heights, short-range views from surrounding uses would not be affected. Partial obstruction of views from uses at a greater distance (i.e., further than 1,000 feet) from the Project Site was determined to be likely and adverse, but not significant. Although significant impacts to visual character and viewsheds were not anticipated with the Master Plan development, mitigation measures were recommended to further reduce potential negative effects.

The Original EIR evaluated artificial light (nighttime illumination and glare) and natural light (shade and shadow) conditions. It was concluded that the approved Master Plan would provide additional sources of nighttime illumination from new security lighting, parking structure lighting, and interior building lighting. Further, it was determined that nighttime lighting from the proposed development on the Project Site would be visible to the existing CSMC, commercial development on Beverly Boulevard, and residences on Bonner Drive. Interior and exterior lighting from a structure at this location, as well as other Master Plan development, would increase the overall nighttime illumination of the project area; however, no significant impacts were anticipated to result because of the existing levels of ambient illumination that already occur in the vicinity. Nonetheless, measures to reduce any negative effects from the introduction of artificial lighting were recommended and adopted. Due to the location of affected residences with respect to the Project Site, and the with the implementation of the mitigation measures, development of the Master Plan was determined to result in a less than significant impact.

In addition, the 1993 Development Agreement (Section 3.2.g) required that CSMC contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis considers the overall visual effect anticipated with the net increase of 200,000 square feet of floor area for medical uses within an overall building development envelope (i.e., the West Tower) consisting of an approximate 460,650 square foot, 185 feet high, 11-story medical tower with attached 7-level parking structure. The new building will contain the 200,000 square feet requested in this application, along with the 90,000 square feet of floor area contained in the Existing Building and the 170,650 square feet of floor area remaining under the Master Plan. The floor area in the Existing Building and the remaining floor area under the Master Plan were both considered in the Original EIR and are used as the baseline against which the net Project change is compared.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the project would have significant impact on aesthetics if it would cause any of the following conditions to occur:[7]

a) Have a substantial adverse effect on a scenic vista;

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

c) Substantially degrade the existing visual character or quality of the site and its surroundings; or

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

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following:

a) The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;

b) The amount of natural open space to be graded or developed;

c) The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;

d) The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

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

f) The degree to which the project would contribute to the area's aesthetic value;

g) Applicable guidelines and regulations;

h) The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);

[7] State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2008).

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

j) The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and

k) The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

l) The change in ambient illumination levels as a result of project sources; and

m) The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

c. Project Impacts

(1) Visual Character/Aesthetics

The Project proposes the addition of 100 new inpatient beds (equivalent to 200,000 square feet of floor area for medical uses and ancillary services). This additional square footage will be combined with the remaining 170,650 square feet of approved entitlement under the Master Plan and the 90,000 square feet contained in the Existing Building to permit construction of a new medical use facility (including the additional 100 inpatient beds proposed by the Project) referred to as the West Tower.

Implementation of the Project would result in the replacement of the 2-story, architecturally non-descript Existing Building and the adjacent Existing Parking Lot with an 11-story, modern-style medical tower. The Existing Building is neither historic nor part of a historic district and is not noted or valued for its visual character. Demolition of the Existing Building would not substantially alter the valued visual character or image of the immediate area from what was previously entitled for this site. As a result, the impact of eliminating existing structures on the Project Site would be less than significant.

The West Tower Project would be similar in size and mass to the existing North and South Towers on the CSMC Campus. The design of the new West Tower structure would incorporate many of the architectural elements of the existing CSMC Campus structures to enhance a unified campus design theme. *Figure 9: Proposed Building Section, Figure 10: Proposed Building Floor Plan 1, and Figure 11, Proposed Building Floor Plan 2* (in *Section II: Project Description*), show the proposed general configuration of the West Tower and attached parking structure. The West Tower facility will be 11 stories tall and up to 185 feet in height. The adjoining 35-foot tall parking structure garage will have a total of seven levels, three of which will be underground, one of which is at ground level and three of which are above-ground. The main entrance of the building would face George Burns Road. The West Tower will be connected via a pedestrian bridge (at Level 3) extending over George Burns Road to the existing inpatient buildings (North Tower) to the east. The bridge will allow inpatient services at the hospital to operate in a more efficient manner. Containing all inpatient care within a cohesive

core of inter-connected facilities will improve the efficiency of patient transfers and emergency room services, as well as convenience to doctors, staff, patients, and visitors.

No building or structure on the subject property shall exceed one hundred eighty five (185) feet in height above grade as defined by LAMC Sections 12.21.1-B.3a and b and as included in the existing zoning.

The West Tower façade will be treated with a combination of stone and glass as shown in *Figure 12: Proposed Building Perspectives: View from Gracie Allen Drive and Figure 13: Proposed Building Perspectives: View from Beverly Boulevard* in *Section II: Project Description.* Also, the Project will be designed in accordance with the LAMC Sections 91.8101-F, 91.8904.1 and 91.1707-E, addressing graffiti removal and deterrence. Specifically, the first nine feet of exterior walls and doors, measured from grade, and all of any walls enclosing the property will be built and maintained with a graffiti-resistant finish consisting of either hard, smooth, impermeable surfaces such as ceramic tile, baked enamel or a renewable coating of an approved, anti-graffiti material or a combination of both. Additionally, portions of exterior non-glass walls may be covered with clinging vines, screened by oleander trees or similar vegetation capable of covering or screening entire walls up to the height of at least nine feet, and will be coordinated through the Landscape Plan.

A pedestrian bridge over George Burns Road would visually link the development on both sides of the street. As with the currently entitled buildings on the Project Site, the new development would help unify the visual character of the CSMC Campus and would be consistent with the existing style and image of the area. Because the Project is complementary to the existing and intended visual character of the CSMC Campus, and the Project's architectural design is attractive and compatible with development in the surrounding area, the Project's impact to the area's aesthetic value and image would be less than significant.

During construction activities for the Project, the visual character of the Project Site will reflect short-term changes as some of the construction activities will be visible from adjacent land uses. As the majority of the demolition and construction will be located internal to the CSMC Campus, much of the construction activities will be screened by existing structures on-site. However, construction security fencing, noise barriers, and staging areas may be located closer to the Project Site edges and therefore more visible during the short-term construction phase.

During construction, equipment and materials would be stored on-site, and temporary facilities (such as construction trailers, staging sites and portable toilets) would be stored on-site but screened by temporary construction fencing. Because of the ongoing CSMC uses, it is anticipated that efforts will be made to continue to present an attractive community presence throughout the duration of the construction activities, and that to enhance safety concerns, construction areas will be clearly partitioned and visually segregated from public areas.

Although construction-related structures and activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 36 months). Following the completion of construction, the CSMC Campus would resume a visual character similar to what currently exists.

Compared to the Original EIR, which concluded that the Master Plan would have an adverse impact by moderately increasing the visibility of the CSMC Campus relative to the surrounding area due to the increased density of development and increased visual prominence, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(2) Viewsheds

Implementation of the Project would increase visibility of development at the Project Site. The two-story Existing Building, which is relatively obscured from view by the surrounding development, would be replaced with an 11-story structure that would be taller than some of the surrounding development off the CSMC Campus.

Under the Master Plan, a 127,500 square-foot building was proposed and approved for the Project Site. It was anticipated that the previously approved development under the Master Plan would be comprised of a 10-story above grade complex, including a pedestrian bridge over George Burns Road. The proposed West Tower would increase the building footprint and massing beyond the initial approval by incorporating one additional story (for a total of 11 stories) and replacing the Existing Building with a parking structure (up to 4 levels above grade). The overall building massing of the West Tower would be wider and more rectangular to accommodate the increase in square footage (up to 460,650 square feet) in the West Tower. However, overall, the West Tower will generally be of similar height, massing, location and orientation to the development that was previously approved under the Master Plan. Moreover, the proposed parking structure will contain one less underground level than analyzed in the Original EIR. *Figure 12: Proposed Building Perspectives: View from Gracie Allen Drive and Figure 13: Proposed Building Perspectives: View from Beverly Boulevard* in *Section II: Project Description*, demonstrate the scale of the Project in the context of other development on the CSMC Campus.

Even with an increase in building height and massing, visibility of the West Tower from surrounding areas would be limited due to obstruction of views from the surrounding existing development. *Figure: 23: Views of Project Site: Southeast Corner of George Burns Road/Gracie Allen Drive, Figure: 24: Views of Project Site: South of Beverly Boulevard on George Burns Road,* and *Figure: 25: Views of Project Site: East of Robertson Boulevard on Gracie Allen Drive*, shows viewsheds toward the Project Site and demonstrate the context of the urban development in the Project area. With the development of the Project, the upper stories of the new structure would be visible from the more outlying areas, such as the intersection of Robertson Boulevard and Beverly Boulevard (see *Figure 20: Views of Urban Character: Beverly Boulevard/Robertson Boulevard*).

Figure 23: Views of Project Site: Southeast Corner of George Burns Road/Gracie Allen Drive demonstrates the view looking northwest from the intersection of Gracie Allen Drive and George Burns Road. Views of the existing surface parking lot and the Existing Building are found in the foreground with limited views of the Hollywood Hills in the background. With the development of the Project, the new structure would be prominent in the foreground and obscure some of the already limited background views.

LOOKING NORTHWEST TOWARD PROJECT SITE

FIGURE 23
VIEWS OF PROJECT SITE: SOUTHEAST CORNER OF GEORGE BURNS ROAD/GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING SOUTHWEST TOWARD PROJECT SITE

FIGURE 24
VIEWS OF PROJECT SITE: SOUTH OF BEVERLY BOULEVARD ON GEORGE BURNS ROAD

SOURCE: PLANNING ASSOCIATES, INC.

LOOKING NORTHEAST TOWARD PROJECT SITE

FIGURE 25
VIEWS OF PROJECT SITE: EAST OF ROBERTSON BOULEVARD ON GRACIE ALLEN DRIVE

SOURCE: PLANNING ASSOCIATES, INC.

Figure 19: Views of Urban Character: Robertson Boulevard/Gracie Allen Drive-Alden Drive shows the view looking east, generally from the intersection of Robertson Boulevard and Gracie Allen Drive. Views of the foreground and background are limited to the existing buildings along Robertson Boulevard. With the development of the Project, the upper stories of the new structure would be visible from this vantage point.

The height and massing of the Project would be consistent with the adjacent CSMC Campus North and South Towers. As the Project would incorporate many of the architectural elements of the existing CSMC Campus structures, the Project would appear as a continuation of existing background features. Overall views from surrounding areas would not be significantly impacted due to the existing development surrounding the Project Site, which already obscures or limits views to and from the Project Site. Although the immediate views of the Project Site would be of the intensified development, the West Tower would be visually consistent with the surrounding CSMC structures. Therefore, less than significant impacts to existing viewsheds are expected.

Compared to the Original EIR, which concluded that the Master Plan would have a less than significant effect on short-range views/viewsheds because existing adjacent structures already block views, and a moderately adverse impact on longer-range views from more distant vantage points because of the overall increased visual prominence, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(3) Nighttime Illumination

The Project would provide additional sources of nighttime illumination with security lighting, parking structure lighting, and interior building lighting. Project lighting would be similar to that of the existing buildings and parking structures within the CSMC Campus and will be designed to minimize any adverse impacts. The West Tower would incorporate tinted exterior windows, which would reduce the intensity of the lighting visible to the surrounding area. All new exterior lighting would be directed downward for illumination on-site and shielded to minimize light spillover for areas off-site.

Night lighting from the West Tower would be visible at adjacent CSMC Campus structures and from commercial development along Beverly Boulevard. Lighting from the Project would not significantly impact commercial development on Beverly Boulevard as the street is already brightly lit at night. Lighting of the upper building levels may be visible to residences on Bonner Drive and residential areas outside of the immediate surrounding area that may have views toward the Beverly Center-Cedars Sinai Commercial Center. Nonetheless, the Project would not significantly impact residences on Bonner Drive and other outlying areas due to the distance of these areas from the CSMC Campus and the cumulative illumination effect from the intervening commercial development on Beverly Boulevard (i.e., the incremental effect of additional lighting due to the Project would be negligible at these distances). Therefore, no significant adverse illumination impacts are expected to occur.

Compared to the Original EIR, which concluded that the Master Plan would result in an increase in nighttime lighting that would be visible but insignificant to nearby residences, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already analyzed in the Original EIR.

(4) Daytime Glare

The West Tower façade will be treated with a combination of stone and glass. The surface area of the lower levels of the West Tower would be broken up by entrances, landscaping and architectural detailing, thereby minimizing the potential for glare from surfaces at street level. The upper stories of the West Tower would be treated with reduced-reflective glass surfaces that minimize the potential for glare from early morning or late afternoon sun. Compliance with the LAMC Section 93.0117 (reflective materials design standards), which limit reflective surface areas and the reflectivity of architectural materials used, would reduce any adverse impact for building material glare. Implementation of the Project would not produce glare that would create a visual nuisance and, therefore, would not result in a significant impact.

The Original EIR did not specifically address daytime glare from building surfaces. However, compared to the Master Plan project, the net change in Project conditions that might affect glare is negligible. Further, as concluded in the analysis above, implementation of the Project would result in an insignificant impact because it would not produce glare that would create a visual nuisance.

(5) Consistency with Adopted Plans and Policies

The Community Plan designates the Project Site as a Regional Commercial land use. The Project is consistent with the Community Plan, in part due to the fact that the CSMC has long been recognized by the community as an established use in this area. Further, the Project is consistent because it furthers the Urban Design policies and guideline identified above (i.e., as through physical site improvements) and indirectly supports those policies by not creating obstacles for their realization (i.e., such as gateway identification for the Beverly Center-Cedars Sinai Regional Commercial Center area). The Project implements many of the site planning, building height, pedestrian-orientation, parking structure design, lighting and landscaping guidelines identified in the Urban Design section of the Community Plan. Pedestrian-orientation is also addressed in detail in *Section IV.D: Transportation and Circulation* of this Draft SEIR. The Project would result in a less than significant impact to aesthetic-related and urban design consistency and compatibility issues in the project area as demonstrated by the Project's consistency with applicable policies and programs of the Community Plan.

The Original EIR did not specifically address consistency with aesthetic-related and urban design policies and guidelines. However, as noted above, the 1993 Development Agreement (Section 3.2.g) required that CSMC contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program. Compared to the Master Plan project, the net change in Project conditions that might

affect consistency is negligible. Further, as concluded in the analysis above, implementation of the Project would result in an insignificant impact because it complies with applicable urban design guidelines.

d. Cumulative Impacts

Development of the Related Projects would incrementally increase the intensity and urbanization of the Project area. As required by the Cities of Los Angeles, Beverly Hills and West Hollywood, the project design must be reviewed by the Los Angeles City Department of Planning for consistency with applicable Los Angeles codes and regulations prior to final plan approval.

(1) Visual Character

Impacts to aesthetics are generally site specific and localized. As discussed above, the Project is anticipated to result in a less than significant aesthetic impact to the visual character along all Property frontages. The Project is located within an urban center that is dominated by dense commercial development and low and mid-rise structures. With the exception of the proposed Beverly Connection (a 240-unit condominium/apartment and retail project) to be located approximately ¼ mile east of the Project Site on La Cienega Boulevard near Beverly Boulevard (EAF 2004-5880), none of the Related Projects are located within the immediate Project area. The Beverly Connection would be constructed consistent with the Community Plan standards and the proposed use is consistent with the surrounding area. Development of the Project in conjunction with the Related Projects would result in redevelopment or infilling of residential and commercial land uses throughout the community. As a result, the Project would not contribute to a potential cumulative impact to visual character in the project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to visual character. Therefore, cumulative visual character impacts of Related Projects are considered to be less than significant.

(2) Alteration of Views

Although aesthetic impacts are generally site specific to the local setting, impacts that may affect panoramic viewsheds or recognized visual resources can have an effect on a broader area. As discussed above, the Project is anticipated to result in a less than significant impact to views from surrounding development. With the exception of a few Related Projects that would exceed six stories in height, the majority of the Related Projects would not be at a scale or height to impact views. The proposed 240-unit condominium/apartment and retail Beverly Connection project at La Cienega Boulevard and Beverly Boulevard, the proposed 296-room Sunset Millennium Hotel at La Cienega Boulevard and Sunset Boulevard, and the proposed 214-room Montage Hotel at Beverly Drive and Wilshire Boulevard would be larger-scale developments, of a height and mass that would be visible components of the skyline, and each may affect views in their immediate surrounding area. These Related Projects are each located approximately ½ mile from each other and are not closely concentrated in a single area. There are no viewpoints in which the Project and the Beverly Connection are visible in the foreground; both sites are only

visible from viewpoints where they are part of the background. The Montage Hotel and the Sunset Millennium projects are each more than ½ mile from the Project Site. Therefore, these projects are not anticipated to have a significant cumulative impact to views within the Project area. The Project would not contribute to a potential cumulative impact to views or viewsheds in the Project vicinity. Furthermore, a separate, site-specific environmental analysis will be prepared for Related Projects to determine and, if necessary, mitigate Related Project-specific potential impacts to aesthetics. Therefore, cumulative impacts related to viewsheds affected by Related Projects are considered to be less than significant.

(3) Lighting and Glare

Build-out of Related Projects in the Project area will contribute to the overall levels of nighttime illumination and glare in the Wilshire Community, as well as in the surrounding communities of Beverly Hills and West Hollywood. Nighttime illumination would cumulatively increase with these developments; however, the Related Projects are located within and spread throughout a highly urbanized area with a high degree of existing nighttime illumination. The additional glow from these projects is considered negligible and not cumulatively considerable, based on comparison to the existing conditions for the densely developed area. Glare and direct lighting are site-specific concerns that would be addressed through the separate, site-specific environmental analysis prepared for each Related Project and, if necessary, mitigated appropriately. Further, the Project and the Related Projects are subject to the LAMC Section 93.0117 reflective materials design standards, which limit reflective surface areas and materials that could contribute to glare. Thus, potential glare created from these Related Projects is not cumulatively considerable. Such mitigation would contribute to the reduction of nighttime illumination as well. Because the Project would not contribute significantly toward increased nighttime lighting levels in the immediate area, its cumulative contribution to lighting is considered to be less than significant.

4. MITIGATION PROGRAM

a. Regulatory Requirements, Standard Conditions, and Project Design Features

MM AES-1: As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

MM AES-2: The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101 and 91.8904.

MM AES-3: The Project is subject to the City of Los Angles Zoning Code, Lighting Regulations, Chapter 9, Article 3, Section 93.0117, which limits reflective surface areas and the reflectivity of architectural materials used.

MM AES-4: Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties.

b. 1993 Mitigation Measures (Carried Forward)

MM AES-5: All open areas not used for the building, driveways, walls, or similar features shall be attractively landscaped in accordance with a landscape plan prepared by a licensed landscape architect and approved by the appropriate agencies. All landscaped areas shall be maintained in a first class condition at all times.

MM AES-6: The landscaped area along the property borders shall include trees spaced a minimum of 15 feet apart, measured from the center of each tree. Trees should be no less than 24-inch-boxes in size.

MM AES-7: Rooftop structures should be screened from view and utilities should be installed underground, where feasible.

MM AES-8: The project should avoid the inclusion of large, blank walls.

MM AES-9: Connection between the parking structures and the medical facilities should be physically integrated to provide a non-hazardous and aesthetically pleasing pedestrian entry into the main building.

MM AES-10: After obtaining project permit approval, the Applicant shall submit final site plans and elevations to the Department of City Planning prior to the issuance of a Building Permit. The Department of City Planning shall compare the final plans with those approved by the City Planning Commission. If the Department of City Planning determines that the final site plans or elevations contain substantial changes, the applicant shall submit the final plans to the City Planning Commission for review and approval.

MM AES-11: All lighting shall be designed and placed in accordance with applicable Bureau of Engineering and Department of Public Works requirements.

MM AES-12: Provision shall be made to include exterior parking structure walls to shield direct glare from automobile headlights into residential areas.

MM AES-13: All outdoor lighting, other than signs, should be limited to that required for safety, securing, highlighting, and landscaping.

MM AES-14: Low level security lighting should be used in outdoor areas.

MM AES-15: Security lighting, as well as both outdoor lighting and indoor parking structure lighting, should be shielded such that the light source will not be visible from off-site locations.

MM AES-16: Lighting should be directed on site and light sources shall be shielded so as to minimize visibility from surrounding properties.

MM AES-17: Exterior windows should be tinted or contain an interior light-reflective film to reduce visible illumination levels from the building.

MM AES-18: Per the 1993 Development Agreement (Section 3.2.g), CSMC must contribute up to $40,000 towards an Urban Design Program for the area generally bounded by Robertson Boulevard, Beverly Boulevard, Third Street, and San Vicente Boulevard. The purpose of the Urban Design Program is to create a more pedestrian-oriented environment in the area and provide a program of unifying themes and implementation program.

c. Recommended Modified and Additional Mitigation Measures

No other mitigation measures are required as adherence to existing regulations, previously required mitigation measures, and the current Project design would already reduce all impacts to less than significant levels.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the standard conditions of approval, project design features, and previously adopted mitigation measures (listed above) would reduce all aesthetic impacts to less than significant levels. Project implementation would result in less than significant impacts related to visual character, viewsheds, nighttime lighting and glare. Construction impacts would be short-term and would not be significant. No additional mitigation measures are introduced in this SEIR as impacts related to aesthetics are already reduced to less than significant levels.

Compared to the Original EIR, which concluded that development of the Master Plan would add adverse impacts by increasing the visibility of the CSMC Campus and no significant impact on views or nighttime light due to existing ambient conditions, the net incremental impact of the Project would be insignificant and the overall impact is similar to that already addressed in the Original EIR, which was reduced to less than significant with implementation of the adopted mitigation measures.