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IV. Environmental Impact Analysis

E.3 Light and Glare - Glare

1. Introduction

Glare is common in urbanized areas and can be caused by either: (1) the reflection of the sun off reflective surfaces during the day (i.e., daytime glare); or (2) the reflection of artificial light sources (i.e., automobile headlights, special events lighting) off reflective surfaces at night (i.e., nighttime glare).

The generation of substantial amounts of daytime glare is dependent on two factors: (1) the presence of mid- to high-rise buildings, signs, or thematic elements that include reflective building materials (i.e., glass, metals) which provide the opportunity for the reflection of sunlight; 103 and (2) the location of such uses in highly visible areas. "Highly visible areas" include areas where all of the following apply: (1) the glare source is within close proximity to a glare-sensitive use; (2) the glare-sensitive use has a direct and unobstructed line-of-site of the glare source; and (3) the glare source is located north, east, or west, but not south, of the glare-sensitive use. Due to the latitude of Los Angeles County, the sun does not shine on glare sources from due north. Since the sun must shine on a reflective surface to be reflected back, glare sensitive uses are not impacted by glare sources to the south.

The generation of substantial amounts of nighttime glare is dependent on the same factors as the generation of daytime glare (i.e., buildings, signs, or thematic elements that include reflective materials and location of such uses in highly visible areas) except that structures do not need to be mid- to high-rise. Light sources associated with low-rise structures can generate nighttime glare. Furthermore, nighttime glare can be generated in

Mid- to high-rise structures which include reflective building materials are necessary for the generation of substantial amounts of daytime glare because only large surface areas can reflect the sun for any extended period of time. This is due to the fact that the sun is constantly moving, making reflective glare transitory. The larger the surface, the longer the sun can hit this surface, and the longer reflective glare can be generated.

any direction, so long as glare sources, reflective buildings, and glare sensitive uses are within close proximity (several hundred feet) to one another.

2. Environmental Setting

a. Glare-Sensitive Receptors

Nighttime glare can interfere with vision, privacy, and general enjoyment of the natural nighttime condition. Daytime glare-sensitive uses generally include residential areas, freeways, and outdoor activity areas (recreational areas and parks). Uses sensitive to nighttime glare generally include residential uses, some commercial and institutional uses, and wildlife habitat within natural areas. For the purpose of this analysis, nighttime glare-sensitive commercial uses would include those with pedestrian-oriented outdoor space and restaurants with outdoor eating space. Based on these criteria, the following is a list of those uses surrounding the Project Site that are considered glare-sensitive to daytime glare, nighttime glare, or both:

(1) East

- Hollywood Manor residential area east of and adjacent to the Project Site (daytime and nighttime glare).
- Oakwood Garden Apartments residential area east of the Project Site across Barham Boulevard (daytime and nighttime glare).

(2) South

- Hollywood Freeway (U.S. 101) adjacent to the southern edge of the Project Site (daytime glare).
- Residential uses on Cahuenga Boulevard (under construction) south of the Project Site across the Hollywood Freeway (daytime and nighttime glare).
- Pedestrian-oriented outdoor spaces and restaurant outdoor eating spaces within the Existing Hotel and Office Towers Area (i.e., the area adjacent to the Project Site that contains the 10 Universal City Plaza building and the Sheraton and Hilton Hotels) immediately southwest of the Project Site across Universal Hollywood Drive (daytime and nighttime glare).
- Cahuenga Pass residential area south of the Project Site across the Hollywood Freeway and Cahuenga Boulevard (daytime glare).

(3) West

- Weddington Park (South) southwest of the Project Site across Lankershim Boulevard (daytime glare).
- Campo de Cahuenga historic site west of the Project Site across Lankershim Boulevard (daytime glare).
- City View Lofts west of the Project Site across Lankershim Boulevard (daytime and nighttime glare).
- The Island residential area west of the Project Site across Lankershim Boulevard (daytime and nighttime glare).

(4) North

- Toluca Estates residential area north of the Project Site across the Los Angeles River Flood Control Channel (nighttime glare).
- Toluca Lake residential area north of the Project Site across the Los Angeles River Flood Control Channel (nighttime glare).
- The outdoor dining space of the Ca' del Sole restaurant north of the Project site across the Los Angeles River Flood Control Channel (nighttime glare).

Commercial uses east of the Project Site along Barham Boulevard, south of the Project Site along Cahuenga Boulevard, and northeast of the Project Site within the City of Burbank generally include office, retail, fast-food restaurant, and service uses that do not provide substantial pedestrian-oriented outdoor space or eating areas that would be considered glare-sensitive. In addition, these areas are located far enough from the Project Site that potential on-site sources of glare would be screened from them by intervening topography and/or other existing non-glare-sensitive uses. As such, these uses are not discussed in detail in this analysis.

The Hollywood Knolls residential area to the east of the Project Site across Barham Boulevard and the Studio City, North Hollywood, and Valley Village residential and commercial areas to the west and north across Lankershim Boulevard are additional glare-sensitive uses within the general vicinity of the Project Site. However, given their distance from potential sources of glare on the Project Site, as well as intervening topography, these areas would not be directly affected by potential Project-related glare sources and are not discussed in detail in this analysis.

b. Existing Daytime Glare Generated at Project Site

The following is an overview of existing daytime glare generated on the Project Site as it is observed from the glare-sensitive uses described above that are located to the south, west, and east of the site. As noted previously, due to the latitude of Los Angeles County, land uses located to the north of daytime glare sources on the Project Site, including the Lakeside Golf Club and the Toluca Lake and Toluca Estates residential areas, cannot be impacted by glare from on-site sources during daylight hours. Sources of existing glare at the Project Site are described below by Area.

(1) East

To the east, the Project Site is bordered by the Hollywood Manor residential area and, to the north and south of this area, Barham Boulevard. Further east across Barham Boulevard are the Oakwood Garden Apartments and Hollywood Knolls residential areas. The majority of homes in the Hollywood Manor area are east-facing and/or below the ridgeline and do not have views of the Project Site. Approximately one-third of the homes in the Hollywood Manor area have some views toward the Project Site. The Studio Area, portions of the Business Area, and the Entertainment Area and Mixed-Use Residential Area are visible from some portions of the Hollywood Manor residential area.

The Studio Area is located in the northern portion of the Project Site, directly south of, and adjacent to, the Los Angeles River Flood Control Channel. The average ground elevation of this Area is below that of most of the Project Site and considerably below that of the Hollywood Manor residential area. Existing production and studio office structures within the Studio Area vary from low- to mid-rise and do not contain substantially reflective surfaces, signage, or thematic elements. No reflective mid- to high-rise buildings that represent sources of glare are located within the Studio Area.

The Business Area is located within the western portion of the Project Site along Lankershim Boulevard between Universal Hollywood Drive and the Los Angeles River Flood Control Channel. Ground elevations within this Area are variable. Existing office and production structures within the Business Area range from mid- to high-rise and include some moderately reflective surfaces associated with the Technicolor buildings, Bank of America building, Jules Stein building, and Lew R. Wasserman building. The Business Area does not currently provide substantially reflective signage or thematic elements.

The Business Area is partially visible from locations within the Hollywood Manor residential area to the east. However, due to intervening on-site development within the

Studio and Entertainment Areas, the Hollywood Manor area is not subject to substantial daytime glare from existing uses within the Business Area.

The Entertainment Area is located in the central and southern portions of the Project Site. The average ground elevation of the Entertainment Area is below that of the Hollywood Manor residential area. Existing Universal Studios Hollywood and Universal CityWalk retail/restaurant, theater, theme park, and other related entertainment uses within the Area include buildings, signage, and thematic elements that range from low- to midrise. The 72-foot tall Back to the Future attraction, a building located at the north edge of Universal Studios Hollywood, is particularly prominent in this area of the Project Site. In addition, the StarWay escalator, which connects Universal Studios Hollywood to the Studio Area, is a visually prominent feature from a variety of angles. Although the majority of these structures do not contain substantially reflective surfaces, some surfaces associated with the most visually prominent features of the Entertainment Area (i.e., the Simpsons attraction and StarWay escalator) occasionally reflect artificial light but do not represent sources of daytime glare.

The Entertainment Area is visible from some locations in the Hollywood Manor residential area to the east. However, since the Hollywood Manor area is located a considerable distance from the Entertainment Area and no daytime glare is currently observed from structures within the Entertainment Area, the Hollywood Manor residential area is not subject to daytime glare from existing uses within the Entertainment Area.

The existing Back Lot Area is located in the eastern portion of the Project Site. The average existing ground elevation within the Back Lot Area varies substantially but is generally below that of the Hollywood Manor residential area. The existing Back Lot Area is partially developed with low-rise outdoor movie sets, storage areas, office/production buildings, and the mid-rise Lakeside Plaza building. These structures do not provide substantially reflective surfaces, signage, or thematic elements. Reflective materials related to film sets and related production activities may also occasionally be present within the Back Lot Area, but this is a sporadic and temporary occurrence.

The Back Lot Area is highly visible from some locations within the Hollywood Manor residential area and partially visible from the Oakwood Garden Apartments, primarily at the Lakeside Plaza building (northeast) end. Since the Oakwood Garden Apartments are located along the west face of the hillside east of Barham Boulevard, some apartments within this community have northwest-facing views towards and beyond the Project Site. There are large stands of mature pine trees along the perimeter and within the development that prevent many of the buildings from viewing the Project Site. However, the higher structures allow views of the northeastern section of the Back Lot Area. Nonetheless, no daytime glare is currently generated from existing uses in the Back Lot

Area. As such, the Hollywood Manor and Oakwood Garden Apartments residential areas are not subject to daytime glare from existing uses within the Back Lot Area.

(2) South

To the south, the Project Site is bordered by the Hollywood Freeway, except at its southwest corner, which abuts the off-site Existing Hotel and Office Towers area. Residential uses are currently under construction on Cahuenga Boulevard south of the Hollywood Freeway. The Cahuenga Pass residential area is south of the Project Site across the Hollywood Freeway and Cahuenga Boulevard.

Views of the Studio Area are completely obstructed from the Hollywood Freeway and from most elevations within the Cahuenga Pass and Cahuenga Boulevard residential areas to the south. The Studio Area is highly visible from the upper stories within the Existing Hotel and Office Towers area to the immediate south of the Project Site. However, no reflective mid- to high-rise buildings that represent sources of glare are located within the Studio Area.

Views of the Business Area are obstructed from the northbound Hollywood Freeway and lower elevations within the Cahuenga Pass and Cahuenga Boulevard residential areas to the south by intervening development and topography both on and off the Project Site. As such, these uses are not subject to daytime glare from existing uses within the Business Area. Views of the Business Area are largely obstructed from the southbound Hollywood Freeway, although some of the buildings (e.g., Lew Wasserman) are partially visible. The off-site 10 Universal City Plaza and hotel buildings in the Existing Hotel and Office Towers area dominate views toward the Business Area from locations south of the Project Site.

The Business Area is partially visible from upper elevations within the Cahuenga Pass residential area to the south. However, due to intervening development within the Entertainment Area, these communities are not subject to substantial daytime glare from existing uses within the Business Area. The Business Area is highly visible from the Existing Hotel and Office Towers area to the immediate south of the Project Site. Daytime glare is currently observed from the Existing Hotel and Office Towers area originating from afternoon sun reflecting off the western and southern façades of existing mid- to high-rise structures within the Business Area.

Existing uses within the Entertainment Area are partially visible from locations along the Hollywood Freeway northbound and southbound and residential uses on Cahuenga Boulevard to the south. However, no daytime glare is currently observed from structures within the Entertainment Area at these locations. The Entertainment Area is visible from both upper and lower elevations within the Cahuenga Pass residential area to the south.

However, since the Cahuenga Pass residential area is located a considerable distance from the Entertainment Area and no daytime glare is currently observed from structures within the Area, this area is not subject to daytime glare from existing uses within the Entertainment Area. The Entertainment Area is highly visible from the Existing Hotel and Office Towers Area to the immediate south of the Project Site. Since no daytime glare is associated with the structures, signage, or thematic elements within the Entertainment Area, the Existing Hotel and Office Towers Area is not subject to daytime glare from existing uses within the Entertainment Area.

The Back Lot Area is partially visible from the Existing Hotel and Office Towers Area, the Hollywood Freeway, and the Cahuenga Boulevard and Cahuenga Pass residential areas, with some views obstructed by intervening on-site development within the Entertainment District and topography. However, no daytime glare is currently generated from existing uses in the Back Lot Area. Reflective materials from film sets and related production activities may be present but this is a sporadic and a temporary occurrence. As such, these areas are not subject to daytime glare from existing uses within the Back Lot Area.

(3) West

To the west, the Project Site is bordered by Lankershim Boulevard, across which are the City View Lofts, the Island residential area, Weddington Park (South), and the Campo de Cahuenga historic site.

Views of the Studio Area are obstructed from the City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga by intervening development and topography both on and off the Project Site. Further, no reflective mid- to high-rise buildings that represent sources of glare are currently located within the Studio Area. As such, these uses are not subject to daytime glare from existing uses within the Studio Area.

The Business Area is highly visible from the City View Lofts and Campo de Cahuenga, and is partially visible from Weddington Park (South). The Island residential area has only limited views of the Business Area. Daytime glare is currently observed from these locations originating from afternoon sun reflecting off the western and southern façades of existing mid- to high-rise structures within the Business Area.

Views of the Entertainment Area from the City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga are largely obstructed by topography and intervening structures within the Business Area and off-site Existing Hotel and Office Towers Area. However, portions of the hilltop Entertainment Area are visible

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NBC Universal Evolution Plan November 2010 from certain locations in these areas in between the structures located in the Business Area and off-site Existing Hotel and Office Towers Area. No daytime glare is currently observed in these areas from structures within the Entertainment Area.

Views of the Back Lot Area are completely obstructed from City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga by intervening on-site development and topography and no daytime glare is currently generated from existing uses in the Back Lot Area. Reflective materials from film sets and related production activities may be present but this is a sporadic and a temporary occurrence, thus, these uses are not subject to daytime glare from existing uses within the Back Lot Area.

c. Existing Nighttime Glare Generated at Project Site

In terms of nighttime glare associated with automobile headlights, the Project Site is surrounded by several major roadways. Because nighttime glare only affects uses located in relatively close proximity to the Project Site, the following discussion focuses on existing nighttime glare that is perceptible along the Project Site's four boundaries.

(1) East

To the east, the Project Site is bordered by the Hollywood Manor residential area and, to the north and south of this area, Barham Boulevard. The Oakwood Garden Apartments further to the east across Barham Boulevard have partial views of the northeastern portion of the Project Site. As indicated in the previous discussion, the Back Lot Area which fronts the Hollywood Manor residential area is currently underdeveloped with primarily low- to mid-rise structures that do not provide substantially reflective surfaces, signage, or thematic elements that have the potential to reflect headlights from either on-site roadways or Barham Boulevard. As such, the Hollywood Manor residential area and Oakwood Garden Apartments are not subject to regular nighttime glare from existing uses within the Back Lot Area. Occasional nighttime filming which can feature the use of temporary lighting and related production activities within the Back Lot Area may create nighttime glare that is visible from locations within the Hollywood Manor residential area for temporary durations, depending on the exact location of the filming or production work and intervening topography. The intervening distance from potential sources of nighttime glare within the Studio, Business and Entertainment Areas and the Hollywood Manor residential area and Oakwood Garden Apartments reduces levels of nighttime glare experienced at these locations to minimal levels.

(2) South

To the south, the Project Site is bordered by the Hollywood Freeway, except at its southwest corner, which abuts the off-site Existing Hotel and Office Towers Area. Residential areas are located along Cahuenga Boulevard south of the Hollywood Freeway while the Cahuenga Pass residential areas are located farther to the south. Existing Back Lot and Entertainment Area uses in the vicinity of Hollywood Freeway, Existing Hotel and Office Towers Area and residential uses on Cahuenga Boulevard do not contain any substantially reflective surfaces, signage, or thematic elements with potential to reflect headlights from either on-site roadways or the Hollywood Freeway, although some surfaces within the Entertainment Area occasionally reflect artificial light from lighting associated with attractions and signage. The Cahuenga Pass residential areas are located too far to the south to be subjected to direct glare from sources on the Project Site.

The Existing Hotel and Office Towers Area to the immediate south of the Project Site receives a moderate degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard and the Hollywood Freeway reflecting off the western and southern façades of existing mid- to high-rise structures within the Business and Entertainment Areas.

(3) West

To the west, the Project Site is bordered by Lankershim Boulevard, across which are the City View Lofts, and the Island residential area. The City View Lofts currently receive a moderate degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard reflecting off the western façades of existing mid- to high-rise structures within the Business Area, including the Technicolor buildings, Bank of America building, Jules Stein building, and Lew R. Wasserman building. The Island residential area to the west is separated from the Project Site by the City View Lofts, topography, and vegetation within Weddington Park (South) and, as such, is not subject to nighttime glare associated with headlights from existing uses within the Business Area.

(4) North

To the north, the Project Site is bordered by the Los Angeles River Flood Control Channel, beyond which are the Ca' del Sole restaurant and the Toluca Estates and Toluca Lake residential areas. These uses currently receive a low degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard reflecting off the northern façades of the mid-rise Technicolor buildings in the northwest corner of the Project Site within the Business Area. Limited views of portions of the Project Site's Studio and Entertainment Areas are also available from this area. Much of this nighttime glare,

however, is blocked by both intervening vegetation and fencing within Toluca Estates and the Lakeside Golf Club. Toluca Lake, north of the Lakeside Golf Club, is separated from the Project Site by intervening topography, vegetation, and fencing associated with the Lakeside Golf Club and, as such, is not subject to nighttime glare associated with headlights from the Project Site.

3. Environmental Impacts

a. Methodology

The potential for a Project-related daytime glare impact is based upon the potential for Project-related development to include mid- to high-rise structures, signage or thematic elements with substantially reflective surfaces that would be located within high visibility of surrounding off-site glare-sensitive uses to the east, south, or west. The potential for a Project-related nighttime glare impact is based upon the potential for Project-related development to include reflective surfaces, signage or thematic elements that would be located within close proximity to both motor vehicle traffic and glare-sensitive uses in any direction.

b. Thresholds of Significance

Daytime glare impacts would be considered significant if future mid- to high-rise buildings, signage or thematic elements that incorporate substantial amounts of reflective building materials were to be developed on the Project Site in areas that are highly visible to off-site glare-sensitive uses. Nighttime glare impacts would be considered significant if future buildings, signage or thematic elements which incorporate highly reflective building materials were to be developed on the Project Site in close proximity to both glare sensitive uses and motor vehicle traffic or would be illuminated by high brightness special effects or event lighting associated with the proposed Project. 104

c. Project Design Features

The proposed City and County Specific Plans governing the respective portions of the Project Site provide restrictions on the use of highly reflective building materials that

See Section IV.E.2, Artificial Light, for further discussion. Generally, high brightness light sources are light sources that have a 30 to 1 contrast ratio between the source of the light and its background.

would reduce the potential for reflectivity on the Project Site. The proposed Specific Plans also set forth the Height Zones permitted for development within the Project Site and contain requirements for the screening of signage and roof-top parking areas on-site.

(1) Building Materials

In accordance with the proposed County Specific Plan, all new buildings and parking structures proposed within the County portions of the Business, Studio, and Entertainment Areas, would be prohibited from the use of highly reflective exterior materials such as mirrored glass. In addition, all surface parking development would be prohibited from the use of highly reflective paving materials. Examples of commonly used non-reflective building materials include cement plaster, concrete, metal, and non-mirrored glass, and will likely include additional materials as technology advances in the future.

In accordance with the proposed City Specific Plan, the use of highly reflective building materials such as mirrored glass would be prohibited within the Mixed-Use Residential Area and the City portion of the Business and Entertainment Areas. In addition, no unscreened rooftop parking would be permitted within 500 feet of any Existing Off-Site Residential Uses.

(2) Signage and Thematic Elements

(a) County Specific Plan

In accordance with the proposed County Specific Plan, the County portions of the Business, Studio, and Entertainment Areas would be divided into four Sign Districts, shown in Figure 19 in Section II, Project Description, including the Northern Edge Sign District, Lankershim Edge Sign District, Visitor Gateway Sign District, and the Studio & Entertainment Sign District. The proposed County Specific Plan sets forth requirements governing the maximum area per sign, maximum height, and maximum number of signs within each of the four Sign Districts. For a more detailed description of Project signage, see Section II, Project Description, of this Draft EIR. As set forth in the proposed County Specific Plan, a range of new signs (or thematic elements) would be permitted within each of the four Sign Districts including, for example, Building and Tenant Identification, Electronic Message, and Supergraphic Signs.

As part of the review procedure for each sign plan application, the Applicant or its successors would be required to indicate the location, sign area, type, height, placement, lettering styles, materials, colors and lighting methods for the proposed sign. This review

would allow the County the opportunity to determine the extent to which the proposed sign is consistent with the expressed provisions of the proposed County Specific Plan.

In addition to other regulations, all signs which would be located within 500 feet of combined boundaries of the proposed County and City Specific Plans and which would be oriented so as to expose the unimproved back of the sign toward a location outside of the Project Site shall be improved with landscaping or other aesthetic treatments to buffer the view of the back of the sign from locations outside the Project Site.

(b) City Specific Plan

In accordance with the proposed City Specific Plan, the Mixed-Use Residential Area and City portion of the Business and Entertainment Areas would be divided into six Sign Districts, shown in Figure -20 in Section II, Project Description. These signage locations would consist of the Universal Mixed-Use Sign District, the Universal City Town Center Sign District, Universal City Barham Sign District, Studio Administration Sign District, Studio Technical Lot Sign District, and the Universal City Existing Southern Entry Point Sign District. For a more detailed description of Project signage, see Section II, Project Description, of this Draft Environmental Impact Report. In addition, the proposed City Specific Plan sets forth requirements governing the maximum area per sign, maximum height, and maximum number of signs within each of the Sign Districts.

As set forth in the proposed City Specific Plan, unless specifically prohibited, a range of new signs would be permitted within each of the five Sign Districts including, for example, Area Identification, Building Identification, and Tenant Identification signs. All signage proposed in the proposed City Specific Plan jurisdiction would require either Sign Application approval from the Director of City Planning or a sign permit from the Department of Building and Safety depending on the type of sign. As part of the sign review, the Applicant would be required to indicate the sign area, type, height, placement, lettering styles, materials, colors and lighting methods, and location for the proposed sign.

In addition to other regulations, all signs which would be located within 500 feet of the combined boundaries of the proposed City and County Specific Plans and which would be oriented so as to expose the unimproved back of the sign toward a location outside of the Project Site shall be improved with landscaping or other aesthetic treatments to buffer the view of the back of the sign from locations outside the combined boundaries of the proposed City and County Specific Plans.

(3) Building Heights

The proposed Specific Plans include a total of 13 Height Zones across the Project Site (seven in the proposed County Specific Plan and eight in the proposed City Specific Plan) that set the maximum elevation that may be reached within each area of the Project Site¹⁰⁵. Building heights are defined at fixed elevations expressed in terms of feet above mean sea level (MSL),¹⁰⁶ measured to the highest point of the building or structure, in the City, or the highest point of any roof structures or parapet wall, in the County. Furthermore, the allowable heights for signs, public art, and communication facilities within the proposed City Specific Plan area would not be allowed to exceed the maximum permitted height established by the respective Land Use District. Cellular facilities, as permitted under the proposed City Specific Plan in Open Space District No. 2, would not exceed 20 feet in height as measured from grade. Within Open Space District No. 3, communication and cellular facilities would not be allowed to exceed the maximum permitted height established by the respective Height Zone for that location. Communication and cellular facilities would not be permitted in Open Space District No. 1.

As shown in Figure 16 and Table 4 in Section II, Project Description, development within the Mixed-Use Residential Area, along the eastern and southeastern Project Site boundaries, could fall within six different Height Zones, ranging from the 625-foot to the 855-foot MSL Height Zones, corresponding to building heights ranging up to 150 feet in height. The Height Zones also include 5 Height Exceptions, ranging from 750-feet to 900-feet above MSL, corresponding to building heights up to approximately 200 feet in height. Development within the southern portions of the Project Site would primarily be within the Entertainment Area's 890-foot MSL Height Zone, allowing for buildings up to approximately 255 feet in height, with a 1,000-foot height exception allowing for building heights up to 365 feet within a 25,000 square foot floorplate. Development within the western portion of the Project Site could occur within the Business Area's 625-foot, 725-foot, 750-foot, and 850-foot MSL Height Zones, allowing buildings ranging up to 295 feet in height. Development along the entire northern edge of the Project Site (which falls within the Business, Studio, and Mixed-Use Residential Areas) is within the 625-foot MSL Height

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The reference to the total number of Height Zones in this context (13) reflects the number of different Height Zone elevations (e.g., 625, 650, 725, etc.) that occur across the entire Project Site. As certain Height Zone elevations occur more than once (e.g., 625 and 850), either in one or both proposed Specific Plan areas, the total number of Height Zone elevations are less than the number of Height Zone areas shown on the proposed Project's Height Zones Map (see Figure 16 in Section II. Project Description, of this Draft EIR) and less than the combination of the Height Zones within the City and County.

Mean sea level is defined as the level of the surface of the sea at its mean position midway between mean high and low tide.

Zone, allowing buildings ranging from 70 to 95 feet in height. In addition, the Studio Area's 650-foot, 740-foot, and 750-foot MSL Height Zones would be located interior to the Project Site but may be visible from some off-site locations, and could allow buildings ranging up to 200 feet in height.

d. Project Impacts

(1) Construction Impacts

Daytime glare could potentially accompany construction activities if reflective construction materials were positioned in highly visible locations where glare conditions (e.g., orientation and presence of glare-sensitive uses) 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 within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. The potential for nighttime glare associated with construction activities is unlikely as most construction activities occur during the day and any nighttime construction work would be temporary. As such, the proposed Project would not result in a significant impact related to construction glare.

(2) Operational Impacts

(a) Daytime Glare

Daytime glare impacts associated with operation of the proposed Project are described below based on glare-sensitive uses located east, south, and west of the Project Site. As noted previously, due to the latitude of Los Angeles County, land uses located to the north of daytime glare sources on the Project Site, including the Toluca Lake and Toluca Estates residential areas, cannot be impacted by glare from on-site sources during daylight hours. Sources of future glare at the Project Site are described by Area.

(i) East

To the east, the Project Site is bordered by the Hollywood Manor residential area and, across Barham Boulevard, the Oakwood Garden Apartments. The Studio Area is currently highly visible from some locations within the Hollywood Manor residential area as discussed under the "Environmental Setting" discussion previously in this Section. As shown in Figures -16 and 19 in Section II, Project Description, development within the Studio Area would generally fall within the Northern Edge and Studio & Entertainment Sign

Districts and Height Zones ranging from the 625-foot MSL Height Zone to the 750-foot MSL Height Zone. Therefore, subject to the provisions of the proposed County Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Studio Area that could be highly visible from some locations in the Hollywood Manor residential area. Nonetheless, as set forth in the proposed County Specific Plan, all new buildings, parking structures, and surface parking in the County portions of the Project Site would be prohibited from the use of highly reflective materials. Therefore, future development in the Studio Area would not have the potential to generate a substantial amount of additional daytime glare impacting the Hollywood Manor residential area and impacts there would be less than significant.

The Entertainment and Business Areas are not highly visible from glare-sensitive uses located to the east of the Project Site (Hollywood Manor and Oakwood Garden Apartments residential areas) as these uses are located too far away from potential glare sources within the Entertainment and Business Areas to be impacted.

The future Mixed-Use Residential Area (formerly a portion of the Back Lot Area) is visible from some locations within the Hollywood Manor residential area and partially visible from some areas within the Oakwood Garden Apartments as discussed under the "Environmental Setting" discussion previously in this section. The Mixed-Use Residential Area is not highly visible from any other surrounding glare sensitive uses (although it is partially visible from the Toluca Lake and Toluca Estates residential areas, these areas are located to the north and northeast and thus would not be susceptible to daytime glare impacts); therefore the proposed Project would not have the potential to significantly impact these other uses.

As shown in Figure 20 in Section II, Project Description, development within the Mixed-Use Residential Area would fall within the Universal Mixed-Use Sign District. As shown therein, the Height Zones in the Mixed-Use Residential Area range from the 625-foot to 855-foot MSL Height Zones with Height Exception areas ranging from 750-feet to 900-feet above MSL. Therefore, subject to the provisions of the proposed City Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements could be developed within portions of the Mixed-Use Residential Area that could be highly visible from some locations within the Hollywood Manor residential area and partially visible, generally in the northeast corner of the Project Site, from the Oakwood Garden Apartments. Nonetheless, the proposed City Specific Plan prohibits the use of mirrored glass or highly reflective materials. Therefore, future development in the Mixed-Use Residential Area would not have the potential to generate a substantial amount of additional daytime glare impacting the Hollywood Manor residential area or Oakwood Garden Apartments and impacts would be less than significant.

(ii) South

To the south, the Project Site is bordered by the Hollywood Freeway, except at its southwest corner, which abuts the off-site Existing Hotel and Office Towers Area. Residential areas are located along Cahuenga Boulevard south of the Hollywood Freeway. The Cahuenga Pass East and West residential area is south of the Project Site across the Hollywood Freeway and Cahuenga Boulevard.

Views of the Studio Area are completely obstructed from the Hollywood Freeway and from most elevations within the Cahuenga Pass and Cahuenga Boulevard residential areas to the south. The Studio Area is currently highly visible from upper stories within the Existing Hotel and Office Towers Area as previously discussed under the "Environmental Setting" discussion in this section.

As shown in Figure 19 in Section II, Project Description, development within the Studio Area would generally fall within the Northern Edge and Studio & Entertainment Sign Districts and Height Zones ranging from the 625-foot to 750-foot MSL Height Zone. Therefore, subject to the provisions of the proposed County Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Studio Area that could be highly visible from the upper stories within the Existing Hotel and Office Towers Area. Nonetheless, as set forth in the proposed County Specific Plan, all new buildings, parking structures, and surface parking in the County portions of the Project Site would be prohibited from the use of highly reflective materials. Therefore, future development in the Studio Area would not have the potential to generate a substantial amount of additional daytime glare impacting the Existing Hotel and Office Towers Area and impacts there would be less than significant.

The Entertainment Area would be partially visible from locations along the Hollywood Freeway northbound and southbound and from residential uses on Cahuenga Boulevard and the Cahuenga Pass residential areas to the south. However, since the Cahuenga Pass residential area is located a considerable distance from the Entertainment Area and since off-site development partially obscures views of the Entertainment Area from the Hollywood Freeway and Cahuenga Boulevard, future glare sources within the Entertainment Area would not be highly visible from the Cahuenga Pass residential areas, Cahuenga Boulevard, and the Hollywood Freeway and would thus not be significantly impacted by the proposed Project.

The Entertainment Area would continue to be highly visible from the Existing Hotel and Office Towers Area to the immediate south of the Project Site as previously discussed under the "Environmental Setting" discussion in this Section. As shown in Figures 16, 19, and 20 in Section II, Project Description, development within the Entertainment Area would

generally fall within the Studio & Entertainment, Visitor Gateway, and Technical Lot Sign Districts and Height Zones ranging from the 700-foot to the 890-foot MSL Height Zone with a Height Exception of up to 1,000 feet above MSL. Therefore, subject to the provisions of the proposed City and County Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Entertainment Area that could be highly visible from the Existing Hotel and Office Towers Area. Nonetheless, the proposed City and County Specific Plan would prohibit the use of highly reflective building materials. Therefore, future development in the Entertainment Area would not have the potential to generate a substantial amount of additional daytime glare impacting the Existing Hotel and Office Towers Area and impacts would be less than significant.

The Business Area is the only Area on the Project Site that currently provides a moderate amount of glare. Views of the Business Area would continue to be obstructed from the northbound Hollywood Freeway and Cahuenga Boulevard and lower elevations within the Cahuenga Pass residential areas to the south by intervening development and topography both on and off the Project Site. As such, the Cahuenga Pass residential area, Hollywood Freeway, and residential uses on Cahuenga Boulevard would not be subject to daytime glare from future uses within the Business Area. Although some of the buildings within the Business Area would continue to be visible from the southbound Hollywood Freeway, future Project development within this area would continue to be visually dominated by buildings within the off-site Existing Hotel and Office Towers Area (e.g., 10 Universal City Plaza, Sheraton Hotel, and Hilton Hotel) and would thus not represent a substantial source of daytime glare. Nonetheless, the proposed City and County Specific Plan prohibits the use of highly reflective building materials. Therefore, future development in the Business Area would not have the potential to generate a substantial amount of additional daytime glare impacting southbound traffic on the Hollywood Freeway and impacts would be less than significant.

The Business Area would continue to be partially visible from upper elevations within the Cahuenga Pass residential area to the south. However, due to the distance between the Business Area and Cahuenga Pass residential area, intervening development within the Entertainment Area, and off-site Existing Hotel and Office Towers Area, the Cahuenga Pass residential area would not be subject to substantial daytime glare from future uses within the Business Area.

The Business Area would continue to be highly visible from the Existing Hotel and Office Towers Area to the south as previously discussed under the "Environmental Setting" discussion in this Section. As shown in Figures 16, 19, and 20 in Section II, Project Description, development within the Business Area would generally fall within the Lankershim Edge, Northern Edge, and Studio Administration Sign Districts, and Height

Zones ranging from the 625-foot to the 850-foot MSL Height Zones. Subject to the provisions of the proposed City and County Specific Plans, new mid- and high-rise buildings, as well as signage and thematic elements could be developed within portions of the Business Area that could be highly visible from the Existing Hotel and Office Towers Area. While the Business Area may continue to generate moderate glare associated with existing on-site buildings visible from the Existing Hotel and Office Towers Area during midday and afternoon hours, the proposed City and County Specific Plans, would prohibit the use of highly reflective building materials. Therefore, future development in the Business Area would not have the potential to generate a substantial amount of additional daytime glare impacting glare-sensitive uses to the south and impacts would be less than significant.

The future Mixed-Use Residential Area would only be partially visible from the Existing Hotel and Office Towers Area, the Hollywood Freeway, and the Cahuenga Pass and Cahuenga Boulevard residential areas to the south and southwest, with some views obstructed by topography and intervening on-site development within the Entertainment Area. Thus, the future Mixed-Use Residential Area would not be highly visible from any glare-sensitive uses located to the south of the Project Site. Further, in the proposed City Specific Plan, would prohibit the use of highly reflective building materials. Therefore, future sources of daytime glare within the Mixed-Use Residential Area of the proposed Project would not have the potential to significantly impact the Existing Hotel and Office Towers Area, the Hollywood Freeway, and the Cahuenga Pass and Cahuenga Boulevard residential areas.

(iii) West

To the west, the Project Site is bordered by Lankershim Boulevard, across which are the City View Lofts, the Island residential area, Weddington Park (South), and the Campo de Cahuenga. The Studio Area is not highly visible from any glare-sensitive uses to the west of the Project Site; therefore the Studio Area of the proposed Project would not have the potential to significantly impact these uses.

The Entertainment Area is only partially visible from areas within the City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga in between the structures located in the Business Area and off-site Existing Hotel and Office Towers Area. As a result, glare from sources within the Entertainment Area under the proposed Project would not have the potential to significantly impact these uses.

The Business Area is the only Area on the Project Site that currently provides a moderate amount of glare. The Business Area is highly visible from the City View Lofts and the Campo de Cahuenga, and is partially visible from Weddington Park (South) as

discussed under the "Environmental Setting" discussion previously in this Section. The Business Area is not generally visible from the Island residential area. As shown in Figures 16, 19, and 20 in Section II. Project Description, development within the Business Area would generally fall within the Lankershim Edge, Northern Edge, and Administration Lot Sign Districts, and Height Zones ranging from the 625-foot to 850-foot MSL Height Zones. Subject to the provisions of the proposed City and County Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Business Area that could be highly visible from the City View Lofts and Campo de Cahuenga, and portions of Weddington Park (South). While the Area may continue to generate moderate glare associated with existing on-site buildings during midday and afternoon hours, as set forth above the proposed City and County Specific Plan would prohibit the use of highly reflective building materials. Therefore, future development in the Business Area would not have the potential to generate a substantial amount of additional daytime glare impacting glare-sensitive uses to the west and southwest and impacts would be less than significant.

Views of the future Mixed-Use Residential Area would be completely obstructed from City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga by intervening on-site development and topography. Thus, the Mixed-Use Residential Area would not be highly visible from any glare-sensitive uses located to the west of the Project Site. Further, as set forth above the proposed City Specific Plan would prohibit the use of highly reflective building materials. Therefore, future sources of daytime glare within the Mixed-Use Residential Area of the proposed Project would not have the potential to significantly impact City View Lofts, the Island residential area, Weddington Park (South), and Campo de Cahuenga.

(b) Nighttime Glare

(i) East

As indicated in the previous discussion, the eastern edge of the Project Site (i.e., the future Mixed-Use Residential Area) is highly visible from some locations within the Hollywood Manor residential area. The northeast portion of the Project Site is also partially visible from areas within the Oakwood Garden Apartments. The Project Site does not currently generate substantial nighttime glare affecting the Hollywood Manor residential area or Oakwood Garden Apartments (excepting potential glare from occasional temporary nighttime filming and related production activities). Subject to the provisions of the proposed City Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Mixed-Use Residential Area that could be visible from some locations within the Hollywood Manor residential area and partially visible from some areas within the Oakwood Garden Apartments. Nonetheless,

the proposed City Specific Plan would prohibit the use of highly reflective building materials. Therefore, future development in the eastern portion of the Project Site would not provide surfaces with substantial potential to reflect vehicle headlights from Barham Boulevard and impacts to the Hollywood Manor and Oakwood Garden Apartments residential areas would be less than significant.

(ii) South

As indicated in the previous discussion, along the southern edge of the Project Site, only the southwest portion of the Project Site is highly visible from the Existing Hotel and Office Towers Area. The Existing Hotel and Office Towers Area currently receives a moderate degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard and the Hollywood Freeway reflecting off the western and southern façades of existing mid- to high-rise structures within the Business Area. Residential areas that are situated along Cahuenga Boulevard, located south of the Hollywood Freeway, would also have a view of the southern edge of the Project Site, although this view would be intermittent due to the presence of the freeway and other off-site development. The Cahuenga Pass residential area would also have a view of the southern edge of the Project Site, but is located too far away to be subjected to nighttime glare impacts from the Project.

Subject to the provisions of the proposed City and County Specific Plans, new midand high-rise buildings, as well as signage and thematic elements, could be developed within the southern portions of the Business Area and southwestern portions of the Entertainment Area that could be highly visible from the Existing Hotel and Office Towers Area. Nonetheless, the proposed City and County Specific Plans would prohibit the use of highly reflective building materials. Therefore, future development in the southern portion of the Project Site would not include surfaces with substantial potential to reflect vehicle headlights from the Hollywood Freeway or Lankershim Boulevard and impacts to the Existing Hotel and Office Towers Area, Cahuenga Pass residential area, and residential uses on Cahuenga Boulevard would be less than significant.

(iii) West

As indicated in the previous discussion, the western edge of the Project Site, which is bordered by Lankershim Boulevard, is highly visible from the City View Lofts located directly across the roadway but is not generally visible from the Island residential area. The City View Lofts currently receive a moderate degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard and the Hollywood Freeway reflecting off the western and southern façades of existing mid- to high-rise structures within the westernmost portions of the Business Area. Subject to the provisions

of the proposed City and County Specific Plans, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within portions of the Business Area that could be highly visible from the City View Lofts residential area. Nonetheless, the proposed City and County Specific Plans would prohibit the use of highly reflective building materials. Therefore, future development in the western portion of the Project Site would not include surfaces with substantial potential to reflect vehicle headlights from Lankershim Boulevard and the Hollywood Freeway and impacts to the City View Lofts residential area would be less than significant.

(iv) North

As indicated in the previous discussion, along the northern edge of the Project Site, only the northwest corner of the Project Site is highly visible from nighttime glare-sensitive uses. Outdoor seating areas at the Ca' del Sole restaurant and the Toluca Lake and Toluca Estates residential areas, located directly across the Los Angeles River Flood Control Channel, currently receive a low degree of nighttime glare from the Project Site originating from vehicle headlights along Lankershim Boulevard reflecting off the northern façades of the existing mid-rise Technicolor buildings in the northwest corner of the Project Site within the Business Area. However, most nighttime glare is currently blocked by intervening vegetation and fencing within both the Lakeside Golf Club and Toluca Estates. Subject to the provisions of the proposed County Specific Plan, new mid- and high-rise buildings, as well as signage and thematic elements, could be developed within the northernmost portions of the Business Area that could be visible from these nighttime glare-sensitive uses. Nonetheless, as set forth above the proposed County Specific Plan would prohibit the use of highly reflective building materials. Furthermore, similar to existing conditions, most Project-generated glare would be blocked from the Toluca Lake and Toluca Estates residential areas and outdoor seating areas at the Ca' del Sole restaurant by existing intervening topography, vegetation, and/or fencing. Therefore, future development in the northwest portion of the Project Site would not provide surfaces with substantial potential to reflect vehicle headlights from Lankershim Boulevard and impacts to the Ca' del Sole restaurant and Toluca Lake and Toluca Estates residential areas would be less than significant.

(c) Impacts Under the No Annexation Scenario

The proposed annexation/detachment of land areas between the City of Los Angeles and County of Los Angeles would not alter the potential for glare impacts on the Project Site; the potential significance level of any glare impacts would be independent of jurisdictional boundaries. As such, potential impacts would remain the same (i.e., less than significant), if the proposed annexation/detachment was not implemented.

4. Cumulative Impacts

Development of the proposed Project in combination with the related projects would result in an intensification of land uses in an already urbanized area of the City and County that currently maintains an elevated level of daytime glare. Similar to the proposed Project, the related projects would be expected to incorporate project design features and/or implement mitigation to avoid the use of highly reflective materials. As the proposed Project would preclude glare-related impacts through project design features, it would not contribute to a cumulatively considerable impact with respect to glare and cumulative glare impacts would be less than significant.

5. Project Design Features and Mitigation Measures

a. Project Design Features

The proposed City and County Specific Plans include project design features that govern the respective portions of the Project Site and provide certain regulations with respect to building materials and signage (including thematic elements), which shall reduce the potential for reflectivity on the Project Site.

b. Mitigation Measures

With regard to mitigation, the proposed Project would not cause any significant adverse glare impacts; therefore, no mitigation measures are required or recommended.

6. Level of Significance After Mitigation

The proposed Project would not significantly impact any glare-sensitive uses as a result of daytime or nighttime glare during either construction or operation. Therefore, the proposed Project would not result in any significant and unavoidable environmental impacts with respect to glare.