4.1 AESTHETICS

4.1.1. AESTHETICS/VIEWS

For purposes of this Draft EIR, the area of aesthetics encompasses aesthetics and views, shade/shadow, and light and glare. These topics are discussed under separate subheadings in this section of the Draft EIR.

TRANSIT PRIORITY AREAS

In 2013, the State of California enacted Senate Bill 743 (SB 743), which took effect January 2014. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a)(7) defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 (a)(4) defines an infill site as “a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.” PRC Section 21099(a)(1) defines an employment center project as “a project located on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is located within a transit priority area.”

The Project is an infill development. Site 1 development is comprised of a new County 21-story office building over a parking structure and ground floor retail, and a new 11-story parking structure on Shatto Place. Site 2 is comprised of the redevelopment of the existing 12-story County office building into residential units and a new 8-story mixed use residential building with a parking structure and ground floor retail. Site 3 is comprised of the removal of the existing DPR building and the construction of a new six-story, senior affordable housing project with a community recreation center and underground parking. As shown in Figure 4.1.1-1, Site 1 is located approximately 1,025 feet (0.19 miles) from the existing Wilshire/Vermont Metro Rail Red/Purple Line station (an existing major transit stop per PRC 21064.3), located at the northeast corner of the intersection of Wilshire Boulevard and Vermont Avenue. Site 2 is located approximately 700 feet (0.13 miles) from the Wilshire/Vermont Station, and Site 3 is located approximately 1,600 feet (0.3 miles) from the Wilshire/Vermont Station. Accordingly, the Project Sites are located within a Transit Priority Area as defined by PRC 21099.

The Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. In addition, Site 1 is zoned for commercial uses, and is proposed to be developed with a County office building at an FAR greater than 0.75. As such, Site 1 would represent an employment center project as defined in PRC Section 21099. On Site 2, the existing 12-story County office building would be redeveloped with residential units and a new mixed use residential building with a parking structure and ground floor
Figure 4.1.1-1
Project Sites Location Within a Transit Priority Area

Source: EcoTierra Consulting and GoogleEarth, 2017.
retail would be constructed. Site 3 would be developed with a senior affordable housing project and community recreation center with underground parking.

Accordingly, proposed development of Sites 1, 2 and 3 would represent residential, mixed-use residential, and/or employment center projects on infill sites in a transit priority area. As such, CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, analyses regarding aesthetics/views, shade/shadow, and light/glare are provided in this Chapter of the Draft EIR for informational purposes.

INTRODUCTION

This subsection evaluates the potential impacts of the Project on aesthetics and views in the Project area. Aesthetics refers to the overall visual quality of an area or given field of view. Visual character includes aspects such as design, size, shape, color, texture, and the general composition of aesthetic features, as well as the relationships between these elements. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. Adverse visual quality effects can include the loss of existing aesthetic features of value or the introduction of contrasting features that could contribute to a decline in overall visual character. The analysis of aesthetics presented below focuses on the Project’s visual relationship with existing and planned land uses in the Project area.

The analysis of views assesses the Project’s potential impacts on visual access to visual resources. In this regard, the analysis considers focal views (i.e., views of a particular object, scene, or feature of visual interest) and panoramic views or vistas (i.e., views of a large geographic area that may be wide and extend into the distance). Building height, mass, and other elements are also considered as they directly relate to view obstruction.

ENVIRONMENTAL SETTING

Existing Conditions

Aesthetics/Visual Quality

Surrounding Locale

The Project Sites are located in an urbanized area. Land uses in the general vicinity of the Project Sites are characterized by a mix of varying levels of intensity residential, commercial, and institutional uses, which vary widely in building style and period of construction. Views of the existing uses in the area of the Project Sites are provided in Figures 3-3 through 3-12 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR. The Hollywood Freeway (US-101), the freeway nearest to the Project Sites, runs southeast-northwest in the Project area, and is approximately one mile to the northeast of the Project Sites. The nearest Metro Rail station (Wilshire/Vermont Station) is located at Vermont Avenue and Wilshire Boulevard, approximately 0.3 miles south of the Project Sites at its furthest point, and is also located at an intersection of two major arterial streets. The confluence of transportation modes has resulted in this area developing as a major activity center in the City.

The physical setting of the Project area consists of the flat portion of the Los Angeles basin, where development in the area has occurred continuously over the last century. Thus, the Project area consists of buildings varying in age that are both historic and modern, occupied primarily by commercial and
institutional uses and multi-family residential development. Overall, there is a lack of uniformity in design among nearby development.

The visual character of the areas immediately surrounding the Project Sites is defined by a number of mid-to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City and include the following (see Figure 4.1.1-2, Locations of High Rise Buildings in the Project Area):

- The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking);
- The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking;
- One Park Plaza (3250 Wilshire Boulevard) – 22 story tower;
- Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels;
- The Summit on 6th (3223 6th Street) – 12 story tower;
- Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower.

The remainder of the area surrounding the Project Sites is characterized by mid- to low-rise buildings located along Vermont Avenue and 6th Street, including the Wilshire Vermont Towers (seven stories) located atop the Metro Rail Station, the Young Oak Kim Academy (three stories) located to the north of the Project Sites, the Galleria Market (three stories) located north of Site 1, and a two-story commercial center located north of Site 3. These buildings are scattered among one-story commercial and institutional (Islamic Center) buildings and surface parking lots located throughout the area.

Low- to mid-rise office buildings and institutional (New Covenant Academy and Church) uses are located along Shatto Place, providing a visual environment that can be characterized as low to medium density urban development.

Land uses located directly adjacent to the Project Sites include commercial, office, retail, institutional, and multi-family residential uses. Site 1 is bounded by a retail center and parking structure on the north, a Walgreens pharmacy and a car wash across Vermont Avenue to the west, Site 2 to the south, and an office building to the east, north of the existing Shatto Place parking structure. Site 2 is bounded by Site 1 to the north, the Walgreens and a City parking lot across Vermont Avenue to the west and southwest, respectively, Central Middle School and a multi-family residential complex across 6th Street to the south, and a restaurant with a surface parking lot and an auto repair shop to the east. Site 3 is bounded by a retail center with surface parking lot to the north, an apartment building to the west, a vacant auto service center to the south, and a religious institution (the Islamic Center) to the east across Vermont Avenue. Photographs of the Project Sites and immediate surroundings are included in Section 3.0 Project Description and Environmental Setting, Figures 3-3 through 3-12.

**Project Sites**

The Project Sites are located in the Koreatown/Mid-Wilshire community of the City of Los Angeles. Site 1 is irregularly shaped and approximately 2.5 acres in size, located on the east side of Vermont Avenue, north of 6th Street. Existing development within Site 1 includes a two-story, 30,788 square foot office building that is occupied by DPR along with a 20-space surface parking lot to the north of this building; an unoccupied one-story, 13,325 square foot office building with rooftop parking spaces; a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot building that is occupied by a multi-family residential complex.
Figure 4.1.1-2
High Rise Buildings In the Area of the Project Sites

1: The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking)
2: The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking
3: One Park Plaza (3250 Wilshire Boulevard) – 22 story tower
4: Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels
5: The Summit on 6th (3223 6th Street) – 12 story tower
6: Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower

Project Site
Source: Google Earth, July 2017.
Shatto Place parking structure (six stories above grade and one story below grade) that connects to the existing occupied County office building and serves all County facilities in the area.

Site 2 is a rectangular, approximately 1 acre site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Existing development within Site 2 includes a twelve-story, 154,793 square foot office building occupied by DMH; a four-story, approximately 52,000 square foot office building occupied by WDACS; and a 14,010-square foot parking structure with one level below grade and one level at-grade. Site 3 is a rectangular, approximately .5 acre site located on the west side of Vermont Avenue, north of 5th Street. Existing development within Site 3 includes a four-story, 29,292 square foot office building occupied by DPR as well as a 65-space surface parking lot at the rear and north of the existing building. All existing buildings and structures within the Project Sites were built between 1938 and 1963. These buildings are non-descript, with no notable architectural characteristics, and do not contribute to the pedestrian environment along Vermont Avenue and 6th Street adjacent to the existing Project buildings. Site 1 includes limited landscaping with seven City of Los Angeles street trees, and an approximately ten-foot cement block wall with wrought iron bars. Four of these trees are Indian laurel fig trees (*Ficus microcarpa nitida*) located on Vermont Avenue. The three other trees are carrotwood trees (*Cupaniopsis anacardioides*) located on Shatto Place. Site 2 includes limited landscaping with four City of Los Angeles street trees, and chain link fencing at the door entryway. These trees are Indian laurel fig trees (*Ficus microcarpa nitida*) located on Vermont Avenue and 6th Street. Site 3 includes limited landscaping, and a ten-foot wrought iron fence near the building at the ground level.

**Visual Resources**

The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites.

The nearest designated scenic highway to the Project Sites is Highland Avenue, north of Wilshire Boulevard; Highland Avenue is approximately three miles west of the Project Sites.¹ The Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway.

There are no tall or topographic features on the Project Sites from which scenic vistas may be viewed, or that make up part of the scenic landscape of the surrounding community. The Project Sites are located approximately three miles south of the Hollywood Hills. Because of this distance, and the blockage of the views by the surrounding mid-rise uses, the Hollywood Hills do not provide a substantial scenic resource in this area. No other visually prominent scenic resources are located in the vicinity of the Project Sites. As noted above, the visual environment on and in the vicinity of the Project Sites is characterized by the existing urban development with no iconic or historic buildings in the vicinity of the Project Sites and no views of the downtown skyline available. The only historical resource in the vicinity of the Project is located at 432-436 South New Hampshire Avenue, which is immediately west of Site 3. The historical resource is the Brynmoor Apartments Neon Roof Sign, which is designated Los Angeles Historic-Cultural Monument #641. At the time of its construction, the Brynmoor Apartments Neon Roof Sign was oriented towards Wilshire Boulevard and visible from this major automobile thoroughfare. However, while the roof sign is visible from Vermont Avenue, it is primarily oriented towards Wilshire Boulevard, the major

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thoroughfare when the building was constructed, and only minimally visible from Vermont Avenue. This secondary view of the sign would be obscured. Furthermore, the intersection of Vermont Avenue and Wilshire Boulevard is not identified by the City or the County as an important view location, and it is not a defined scenic resource. The new building would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from the primary view from Wilshire Boulevard and secondary view from Vermont Avenue.

Existing Views

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private properties. The views associated with the Project Sites are discussed in detail in the following paragraphs.

A range of low- to high-intensity commercial and residential land uses define the viewsheds in the Project area, with multiple high-rise structures located along Wilshire Boulevard (south of the Project Sites) and a smaller number of taller buildings (including the existing County DMH building) along 6th Street (west of Site 2). The remainder of the area is characterized by mid- to low-rise residential, commercial, and institutional buildings.

At the street level, views are limited predominantly to those available from Vermont Avenue, Wilshire Boulevard and 6th Street. No visually prominent scenic resources are located in the area of the Project Sites. The existing viewsheds are defined primarily by existing urban development and the existing urban development prevents the availability of expansive scenic views from around the Project Sites.

Views From the Project Sites

The Project Sites are located in an urbanized setting. As a result, the Project Sites provide direct public views of surrounding low- to mid-rise commercial and residential development to the north, west, and east. Direct views of high rise development to the south are available from Site 2 and Site 3 (most view lines to the south from Site 1 are blocked by the existing Site 2 building).

Views Of and Toward the Project Sites

The area of the Project Sites is relatively flat. The Project Sites contain existing urban development, characterized by non-descript buildings, with no discernible architectural characteristics, with walls and fencing and limited landscaping at the ground level. Only the existing 12-story DMH building is at all prominent. The other two- to four-story buildings are not visually discernible from the surrounding development. Public vantage points are primarily available from area roadways, most notably Vermont Avenue and 6th Street. Due to the surrounding development, distant public views of the Project Sites are not available.

Several public parks and recreation facilities are located in the Project area. The closest recreation facility to the Project Sites is Shatto Recreation Center, located approximately 0.15 miles northeast of Site 3. However, due to the existing development, views of the Project Sites and the mid-rise buildings in the immediate area are not available from this facility.
Views Through the Project Sites

Due to the location of the Project Sites and existing surrounding development, there are no expansive views through the Project Sites. Moreover, no scenic or visual resources are located in the vicinity of the Project Sites.

Regulatory Framework

Federal

No federal aesthetic regulations apply to the Project.

State

California’s Scenic Highway Program was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler’s enjoyment of the view. The California Department of Transportation (Caltrans) defines a State Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Eligibility for designation as a State Scenic Highway is based on vividness, intactness, and unity of the roadway. No State-designated scenic highways are located in the area of the Project Sites.

County of Los Angeles

County of Los Angeles General Plan, Conservation and Natural Resources Element

The Conservation and Natural Resources Element includes policies intended to protect open space-related resources, including land and water areas devoted to recreation, scenic beauty, and the conservation and use of natural resources. As noted above, no scenic resources are located in the area of the Project Sites.

County of Los Angeles General Plan, Land Use Element

The Land Use Element provides strategies and planning tools to facilitate development and revitalization efforts. It includes goals and policies aimed at encouraging a more concentrated urban development pattern through the revitalization of deteriorating urban areas, infilling of bypassed lands and focusing new urban development in the most suitable locations. The Land Use Element also includes policies intended to conserve natural resources and ensure compatibility between new development and the natural and manmade environment.

City of Los Angeles

General Plan Framework

As discussed in further detail in Section 4.9 (Land Use and Planning) of this Draft EIR, the City of Los Angeles General Plan Framework Element (the “Framework”) includes a Long Range Land Use Diagram for the Metro region, which identifies all three Project Sites as being located in a Regional Center. According to the Framework’s Long-Range Land Use Diagram for the Metro region, a Regional Center is an area
targeted for high-density land uses, and a focal point of regional commerce, identity, and activity.\(^2\) Regional Centers generally have a range of floor area ratios from 1.5:1 to 6.0:1 and are characterized by buildings ranging from 6 to 20 stories high (or higher).

The Urban Form and Neighborhood Design chapter of the Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales.

**Wilshire Community Plan**

As discussed in further detail in Section 4.9 (Land Use and Planning) of this Draft EIR, the Wilshire Community Plan (the “Community Plan”) guides land uses on the Project Sites and in the surrounding areas (the “Community Plan Area”, or “CPA”). Although the land use designations in the Community Plan are not directly applicable to Sites 1 and 3, the Plan establishes the vision for the long-term development of the CPA, which would also work to establish the visual environment of the area. The Community Plan designates the Project Sites for Community Commercial land uses. The Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 2 and 3 are zoned C2-1. An assessment of the Project’s compliance with the purpose of the Community Plan is analyzed in greater detail in Section 4.9 (Land Use and Planning) of this Draft EIR.

**Citywide Design Guidelines**

The Citywide Design Guidelines serve to implement the General Plan Framework’s urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the General Plan Framework and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and “flexibility is necessary and encouraged to achieve excellent design.”\(^3\) The City’s Urban Design Studio, which is part of the City of Los Angeles Department of City Planning, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals.\(^4\) Accordingly, the elements of the Citywide Design Guidelines are considered in the aesthetic impact analysis for Site 2 along with project-specific input received during the City’s urban design review processes, which has been applied to the Project.

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\(^2\) City of Los Angeles Department of City Planning, City of Los Angeles General Plan Framework, Long Range Land Use Diagram, Metro.

\(^3\) Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.

Walkability Checklist

In January of 2007, the Department of City Planning created the Walkability Checklist: Guidance for Entitlement Review (Walkability Checklist). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. In this case the Walkability Checklist would only be applicable to Site 2. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the City Framework. Incorporating these guidelines into a project’s design encourages pedestrian activity, more adequate forms, and place making.

City of Los Angeles Planning and Zoning Code

All on-site development activity on Site 2 is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. Sites 2 is zoned C2-1.5

C2 is a commercial zone, which allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses. The Project would include uses that are within these categories and would therefore be consistent with the C2 zoning designation.

Site 2 is located within Height District 1. Height District 1 permits development at a Floor Area Ratio (FAR) of 1.5:1 with no height limit (i.e., height is only limited by the allowable floor area). Although the existing Site 2 office building exceeds the C2-1 1.5:1 floor area, the Adaptive Reuse Specific Plan nevertheless permits adaptive reuse of the existing commercial square footage for residential and ground floor commercial uses. However, the new construction proposed at Site 2 would require entitlements from the City of Los Angeles to exceed the 1.5 to 1 floor area limitation otherwise allowed by the C2-1 zone/height district.

ENVIRONMENTAL IMPACTS

Methodology

Aesthetics

The analysis of aesthetics considers the visual quality of the area immediately surrounding the Project Sites and the impacts of the Project with respect to the existing aesthetic environment. The analysis evaluates the visual impacts that the Project would have on the overall visual environment of the Project area and whether the Project development would be compatible with and would respect surrounding development. Specifically, the analysis considers the physical aspects of the Project and its associated

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5 For disclosure purposes, the Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 3 is zoned C2-1.5 However, as discussed above, City zoning and building requirements do not apply to Sites 1 and 3.
design features, and includes renderings showing future conditions at representative locations where the Project is visible from the public right-of-way.

**Views**

The analysis of views evaluates the changes to existing public views that may result from Project development. The intent of the analysis is to determine if valued view resources are visible in the Project area and whether visual access to such resources would be blocked or diminished as a result of the Project. The analysis further considers whether the Project would enhance viewing conditions through the creation of new resources and whether the Project includes design features that would offset or mitigate specific impacts.

To determine whether a potential view impact would occur, a three-step process is used to weigh several considerations, as follows:

**Step 1:** Define the view resources that could be affected by proposed development.

**Step 2:** Identify the potential obstruction of view resources as a result of development of the particular Project Site.

**Step 3:** Evaluate whether a potential obstruction would substantially alter the view. The “substantiality” of an alteration in viewing is somewhat subjective and dependent on many factors. In this case, an obstruction in the view of a particular view resource is considered to be substantial if it exhibits the following traits:

1. the area viewed contains a valued view resource;
2. the obstruction of the resource covers more than an incidental/small portion of the resource; and
3. the obstruction would occur along a public view area.

**Thresholds of Significance**

The following threshold questions have been included in accordance with guidance provided in Appendix G to the State CEQA Guidelines:

**Threshold 4.1.1-1:** Would the Project have a substantial adverse effect on a scenic vista?

**Threshold 4.1.1-2:** Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

**Threshold 4.1.1-3:** Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

An affirmative answer to any of these questions would represent a significant impact. The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites. Furthermore, the nearest designated scenic highway to the Project Sites is Highland Avenue, which
is approximately three miles west of the Project Sites. Accordingly, the Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway. As such, no further analysis of Thresholds 4.1.1-1 and 4.1.1-2 is necessary. These topics are addressed in Section 6.5, Effects Found Not to be Significant, of this Draft EIR.

Project Design Elements

The Project would include one structure up to 280 feet in height that would accommodate governmental offices and commercial retail, three structures that would be 173, 105 and 95 feet in height, respectively, that would accommodate multi-family residential, and community recreation center, and a structure up to 130 feet in height that would accommodate parking uses. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their contribution to the visual environment on and in the vicinity of the Project Sites.

Impact Analysis

Threshold 4.1.1-3: Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction

Construction activities typically contrast with, and disrupt the general order and existing aesthetic character of a given location or area. As proposed, the Project would be constructed in two phases. Site 1 and Site 3 would be developed in Phase I, which is anticipated to begin in summer 2018 and summer 2019, respectively. Construction activities on Site 1 and Site 3 are expected to be completed by summer of 2019 and 2020, respectively. Site 2 would be developed in Phase II, which is anticipated to begin in fall 2021 and completed by late 2023.

Project construction activities would include the demolition and removal of certain existing uses; site preparation, grading, and excavation; staging of construction equipment and materials; construction of structures; and the installation of landscaping and hardscaping. The construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities occurring during each time period. Although temporary in nature, these construction activities would alter the visual appearance of the Project Sites and would be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, the Project Sites’ appearance during construction would be typical of construction sites in urban areas. Temporary barriers, which would likely be K-rail and plywood extending to eight feet in height, would be installed around each of the Project Sites during construction to screen the construction activities and equipment from street level views.

Construction activities typically include both a disturbance in existing natural and man-made features and the development of structures, which, at least temporarily, are devoid of external treatments designed to improve visual character. These could cause substantial changes in visual character if they occur within close proximity to surrounding viewsheds, and are uncharacteristic of the existing setting. However, no visually prominent scenic resources are located in the area of the Project Sites. The existing viewsheds are defined primarily by existing urban development, and the existing urban development prevents the availability of expansive scenic views from around the Project Sites. Construction of structures that include the use of temporary towers and cranes could also interfere with existing views. Some Project
construction activities would likely be visible above the ground level barriers from surrounding properties that currently have views of the Project Sites.

In terms of visual character, Project construction activities would result in temporary changes as viewed from the street and from the adjacent buildings. Thus, while Project construction would alter the visual character of the Project Sites, such activities would be partially screened, temporary in nature, and visual impacts associated with construction would cease after completion. Based on the above, Project construction activities would not substantially alter or degrade the existing visual character of the Project Sites or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Operation

Height and Massing

The Project would involve development of the Project Sites as described below.

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helistop), and would consist of 21 total stories (13 office floors over an eight-story parking structure (seven levels above grade and one level at grade)). In addition, a new parking structure would be constructed on the site of the existing seven-story parking structure on Shatto Place. This new structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. The new parking structure would be up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room).

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units, 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space, and an approximately 7,500 square foot roof deck amenity. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units, and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).
Site 3

Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new 80,837 square foot, six-story, one hundred percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

The size and nature of the Project development would result in greater building mass and density at each of the Project Sites compared to existing conditions. The new County office building on Site 1, with a 13-story office tower over one at grade and seven above-ground parking levels, would represent a substantial change from the existing one- and two-story structures on this Site. Furthermore, this new structure would be visually prominent in this area as a result of both its height and mass. The new Shatto Place parking structure on Site 1 would occupy the same footprint as the existing parking structure, but would be 11 stories, approximately four stories taller than the existing structure.

The redevelopment of the existing Site 2 DMH building would result in similar height and mass as the existing building, approximately 12 stories. However, the new mixed use building would be eight stories, approximately four stories taller than the existing four-story building.

Existing development within Site 3 includes a four-story, office building occupied by DPR as well as a 65-space surface parking lot at the rear and north of the existing building. The height of the building on Site 3 would increase from a four-story structure to a six-story structure.

Furthermore, the changes in height and mass of buildings on the Project Sites would be consistent with height and mass of other buildings located in the area. Specifically, the Project Sites height and massing would be similar to The Vermont’s 23-story and 28-story high-rise buildings on Wilshire Boulevard and the 12-story residential building to the west of Site 2 on 6th Street. In addition, the Project Sites would be in keeping with the character of the project area which is centered on the Wilshire/Vermont Metro Rail station. Even with the increased height and mass, the proposed new and redeveloped buildings on the Project Sites would represent a notable improvement in the appearance of the Project Sites. With the exception of the Site 1 County office building, the other new development would only be an incremental increase from existing buildings (i.e., four stories to eight stories, and lower than the 12-story County office building that would be redeveloped, on Site 2, and four stories to six stories on Site 3).

Visibility of the Project Sites

The Project would substantially increase the visibility of the Project Sites, particularly Site 1, from a distance, as compared to existing conditions. Due to the height of the new County office building on Site 1, the County office building would likely be visually prominent from the surrounding area. This increased visibility would occur on nearby roadways and adjoining sidewalks, including Vermont Avenue, Wilshire Boulevard and 6th Street. The intersection of Vermont Avenue and Wilshire Boulevard is approximately 0.18 miles southwest of Site 1. Additionally, the greater height and mass would increase the visibility of Site 1 from nearby residential and commercial properties. Although there is a public park in the Project area (Shatto Recreation Center), the new County office building likely would not be visible from this park due to distance and intervening development. Even with increased prominence, however, the Project at Site 1 would be visually integrated with the existing character of the area south of Site 1, because the area is characterized by high-rise development in an urbanized setting. In addition, most view lines of Site 1 from the south are blocked by the existing Site 2 building.
As discussed previously, the visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City and include the following (see Figure 4.1.1-2, Locations of High Rise Buildings in the Project Area):

- The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking);
- The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking;
- One Park Plaza (3250 Wilshire Boulevard) – 22 story tower;
- Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels;
- The Summit on 6th (3223 6th Street) – 12 story tower;
- Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower.

The remainder of the area surrounding the Project Sites is characterized by mid- to low-rise buildings located along Vermont Avenue and 6th Street, including the Wilshire Vermont Towers (seven stories) located atop the Metro Rail Station, the Young Oak Kim Academy (three stories) located to the north of the Project Sites, the Galleria Market (three stories) located north of Site 1, and a two-story commercial center located north of Site 3. These buildings are scattered among one-story commercial and institutional (Islamic Center) buildings and surface parking lots located throughout the area. There is no consistent architectural style that presently characterizes the area of the Project Sites.

Moreover, new Project development on all Project Sites would provide urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted City of Los Angeles land use plans, including the Wilshire Community Plan, which envision the concentration of development in transit station areas in the future.

**Architectural Design**

The overall effect of the Project with respect to design would be to improve the current appearance of the Project Sites and to provide an aesthetically pleasing and pedestrian-friendly scale and atmosphere along Vermont Avenue and 6th Street. The existing buildings on the Project Sites were built in the 1950s and 1960s and do not include any noteworthy architectural design features. The Project would upgrade the architectural quality of all three Project Sites through the construction of new buildings and upgrading of the existing County office building on Site 2. At each Site, the Project would integrate a pedestrian scale design, including locating building entrances at grade, the use of a variety of textures, materials, signage, and architectural features appropriate to each Project Site, including eco-friendly building materials, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance exterior sheathing on the buildings, thereby minimizing the effects of building mass and blank street walls. The Project’s ground floor commercial spaces on Vermont Avenue (Sites 1 and 2) and 6th Street (Site 2) would serve to activate the street level along Vermont Avenue and improve the pedestrian experience. The buildings would be modern in style. In addition, Section 3.0 Project Description and Environmental Setting of the Draft EIR, provides an illustration of the access entry points to the Project Sites in Figures 3-13, 15, and 17.

The Site 1 building has been designed in 360 degrees with no one side containing less architectural detail in building textures and materials. Entrances would be provided both from Vermont Avenue and from the new Shatto Place parking structure. The Vermont Avenue entrance would be designed to
accommodate employees and visitors arriving at Site 1 by transit. The proposed building features ground level retail and lobby areas along Vermont Avenue that consist of high storefront glazing which fronts a concrete parking structure podium clad above ground level with horizontal and diagonal aluminum fins in combination with metal mesh screen. This transitions up to a steel structure office tower consisting of a high-performance aluminum curtainwall glazing system with extruded aluminum fins to maximize energy performance and to carry the building aesthetic up from the ground floor level. The building also includes a spacious outdoor terrace level that serves as primary building entry for the Department of Mental Health. The terrace level consists of architectural concrete, a large operable glass folding wall and substantial landscaping to support an indoor/outdoor working environment.

The Shatto Parking would be a concrete structure with an architectural metal mesh screen along Shatto Place to create an architecturally unifying design.

The redevelopment of the existing DMH building on Site 2 would involve removal of the existing exterior materials and construction of a new exterior façade using energy efficient thermal glass and new structural reinforcement members acting as an exoskeleton structural rehabilitation. The design is meant to create a one of a kind architectural expression that is differentiated from the new office building, but that still compliments the area and the new County office tower.

A new three-story concrete parking structure with five levels of residential units above would be constructed to the East of the existing building. Figure 4.1.1-3 illustrates the proposed views of Project Sites 1 and 2 as seen from Vermont Avenue.

Construction of the new senior affordable housing and community recreation center project on Site 3 would provide a contemporary architectural design utilizing building textures, neutral color tones, and materials such as board formed concrete, cementitious siding, reveal panel system, and Portland cement that would also create visual interest on the segment of Vermont Avenue between 4th and 5th Street. Figure 4.1.1-4 shows the view of the affordable housing and community recreation center project on Site 3 from Vermont Avenue.

**Landscaping**

The Project’s ground floor plan contains enhanced landscaping designed to improve the pedestrian experience on the Project’s Vermont Avenue frontage on all three Project Sites. Figure 4.1.1-5 illustrates the street level view of Sites 1 and 2 as seen from Vermont Avenue. On Site 1, the Project includes sidewalk improvements and construction that would significantly impact seven City of Los Angeles Street Trees, and ten non-protected significant trees located within Site 1. The seven street trees would be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of fourteen (14) new street trees. The ten non-protected significant trees would be removed and replaced at a ratio of 1:1 upon the completion of construction, for a total of 24 new trees on Site 1.
Figure 4.1.1-3
Views of Project Sites 1 and 2 from Vermont Avenue

Figure 4.1.1-4
Views of Project Site 3 from Vermont Avenue
Source: Gensler, 2017.

Figure 4.1.1-5
Street Level View of Sites 1 and 2 from Vermont Avenue
On Site 2, the Project includes sidewalk improvements and construction that will significantly impact four City of Los Angeles Street Trees, and ten non-protected significant trees within Site 2 would be removed and replaced at a ratio of 1:1 upon the completion of construction, for a total of 18 new trees on Site 2. Landscaping would also be provided on 6th Street adjacent to Site 2, and on Vermont Avenue adjacent to Site 3.

No trees would be impacted on Site 3, so no trees would be replaced.

**Conclusion**

Thus, while Project construction would alter the visual character of the Project Sites, such activities would be partially screened, temporary in nature, and visual impacts associated with construction would cease after completion. Based on the above, Project construction activities would not substantially alter or degrade the existing visual character of the Project Site or surrounding area.

The Project’s architectural design described above and orientation on the Project Sites, would be integrated into the Project area by incorporating appropriate design, architecture, size, and massing. In addition, the Project’s location, height, scale, and architectural features are generally compatible with the existing and planned development for the Wilshire Community Plan Area. As stated above, the visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City. Moreover, new Project development on all Project Sites would provide urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted City of Los Angeles land use plans, including the Wilshire Community Plan, which envision the concentration of development in transit station areas in the future. Thus, the Project would not substantially degrade the existing visual character of the Project Sites or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

**CUMULATIVE IMPACTS**

As indicated in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are 115 related projects in the vicinity of the Project Sites. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, and hotel developments. There are 3 related projects located near the Project Sites. These proposed developments comprise a variety of uses, including apartments, as well as mixed-use developments, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Wilshire Community Plan Area, which will likely entail general increases in the height, mass, and scale of buildings throughout the area. However, only those projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or affect the same off-site sensitive uses could pose cumulative effects in conjunction with the Project.

Cumulative impacts regarding aesthetics may occur if any of the related projects are located in close enough proximity to the Project Sites to combine with the Project and result in significant adverse changes in the visual quality and character of the surrounding area. As shown in Figure 3-22 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are three related projects that are located
sufficiently close to the Project Sites to enter the same field of view as the Project: Related Project No. 68, No. 84, and No. 92. With respect to visual quality and character, these related projects would be similar to or smaller in scale than the Project and generally representative of the existing urban fabric and character in the area. Therefore, it is not anticipated that future development, inclusive of the Project and nearby related projects, would substantially alter, degrade, or eliminate the existing visual character of the Project area, including valued existing features or resources, or introduce elements that would substantially detract from the visual character of the area.

In general, related projects have the potential to block views from local streets and other public vantages throughout a Project area. With respect to the Project, the views most likely to be affected on a cumulative basis are views of the Hollywood Hills. As previously indicated, the Project would not affect views of the Hollywood Hills. Related Project Nos. 68, 84, and 92 are located sufficiently close to the Project Sites to enter the same field of view as the Project. Cumulative impacts would occur if the Project and the three closest related projects would further obstruct views of these valued visual resources. Due to the location of the Project and the three closest related projects views of the Hollywood Hills would remain intermittent similar to the existing uses due to the distance to the Hollywood Hills, and the height of the surrounding uses.

The study area for the analysis of cumulative aesthetic impacts includes areas with views of the Project Sites, which occur in certain portions of the Wilshire Community Plan Area. Development of the Project in combination with the related projects located within the CPA would result in an intensification of land uses in an already urbanized area of the City. However, anticipated growth would continue to be guided by the Community Plan and other planning tools that anticipate the continued densification and concentration of development in this area of the City. Consequently, no changes in the nature or land use of various communities that would substantially degrade the area would be permitted to occur under the Community Plan and CEQA review, thereby protecting the visual character of the area. Thus, development of the Project in combination with the related projects located in the Wilshire Community Plan Area would not result in adverse cumulative visual compatibility impacts. As such, cumulative aesthetic and view impacts would not be cumulatively considerable. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

**PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS**

**Project Design Features**

No specific Project Design Features are proposed relevant to aesthetics/views, other than the design characteristics of the Project buildings as described in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

**Regulatory Requirements**

No Regulatory Requirements are related to aesthetic/view impacts.
MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
4.1 AESTHETICS
4.1.2. SHADE/SHADOW

INTRODUCTION

The issue of shade and shadow refers to the blockage of direct sunlight for a given amount of time and is a common and expected occurrence in developed areas. Shading can have an adverse impact if it substantially interferes with the enjoyment or performance of sun-related activities. Users or occupants of certain land uses, such as residential, recreational, schools, and outdoor restaurants have expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive,” because sunlight is important to function, physical comfort, and commerce. This subsection includes an assessment of several shade-related factors, including the height and size of the building, the proximity and sensitivity of surrounding uses, the season of the year, and the duration of shadow projection. The angle of the sun varies based on the rotation of the earth (i.e., time of day) and elliptical orbit (i.e., change in seasons). The longest shadows are cast during the winter months, and the shortest shadows are cast during the summer months. This section also includes a depiction of the shadows that would be cast by the Project. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, the following analysis regarding shading is provided for informational purposes only.

ENVIRONMENTAL SETTING

Existing Conditions

Shading

Winter and Summer Solstice

“Solstice” is either of the two points on the sun’s elliptic that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 ½° of the arc. At the time of summer solstice, around June 21, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. At winter solstice, around December 21, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. Measuring shadow lengths for the winter and summer solstices represents the extreme shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice. Shadows cast during the winter solstices generate the longest shadows all year as a result of the angle of the sun.

Spring and Fall Equinoxes

“Equinox” is either of two points of intersection of the sun’s apparent annual path and the plane of the earth’s equator, that is, a point of intersection of the elliptic and the celestial equator. At the equinoxes,
day and night are the same duration as the sun’s transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices.

**Shadow-Sensitive Land Uses**

Facilities and operations that are sensitive to the effects of shading generally include, but are not limited to:

- routinely usable outdoor spaces associated with residential or institutional land uses;
- commercial uses, such as pedestrian-oriented outdoor areas or restaurants with outdoor eating areas;
- nurseries;
- existing solar collectors; and
- recreational areas, such as parks.

These land uses are considered to be sensitive because sunlight is important to function, physical comfort, or commerce. The shadow sensitive receptors to Sites 1 and 2 are:

- school use to the south (85 feet);
- school use to the east (90 feet);
- residences to the east (280 feet); and
- residences to the west (300 feet).

The nearest sensitive receptors to Site 3 are:

- adjacent residences to the west (50 feet);
- residences to the north (300 feet);
- residences to the south (335 feet); and
- recreational and residential uses to the northeast (450 feet).

No other shadow-sensitive land uses are located close enough to the Project Sites to be potentially affected by shadows from Project buildings. Non-shadow sensitive uses located in the vicinity of the Project Sites include the Galleria Market, located north of Site 1, office buildings located north of the Shatto Place parking structure, and a commercial center located north of Site 3.

**Existing Shadow Patterns**

Shadows from the existing buildings on the Project Sites, including the two DPR buildings on Site 1, existing Shatto Place parking structure, existing DMH building and existing WDACS building on Site 2, and existing DPR building on Site 3, are shown in Figures 4.1.2-1 and 4.1.2-2 for the equinox and winter solstice time frames respectively. As shown in Figure 4.1.2-1, equinox shadows from existing buildings on Site 1 cover a small part of the Galleria Market commercial space during the afternoon hours. Existing shadows from the Shatto Place parking structure cover portions of the office buildings to the north throughout the daytime hours, as this structure is immediately adjacent to the office building to the north. Existing shadows from Site 2 only fall on Site 1 and on Vermont Avenue, while existing shadows from Site 3 cover a small portion of the commercial center to the north during portions of the morning and afternoon hours. Existing shadows from Sites 1, 2 and 3 do not fall on any shadow-sensitive receptors during the spring/fall equinox time frame.
Figure 4.1.2-1
Spring/Fall Equinox Shadows
September 22nd and March 22nd

Source: Google Earth, December 2016.
Figure 4.1.2-2
Winter Solstice Shadows
December 21st

LEGEND

SITES 1 AND 2
1 school use to the south (85 feet)
2 school use to the east (90 feet)
3 residences to the east (280 feet)
4 residences to the west (300 feet)

SITE 3
5 adjacent residences to the west (50 feet)
6 residences to the north (300 feet)
7 residences to the south (335 feet)
8 recreational and residential uses to the northeast (450 feet)

9 Galleria Market
10 Shatto Place parking structure

EXISTING BUILDINGS
PROPOSED BUILDINGS

Source: Google Earth, December 2016.
As shown in Figure 4.1.2-2, winter solstice shadows from Site 1 cover part of Vermont Avenue during the morning hours, and a small portion of the Galleria Market commercial space during the afternoon hours. Existing shadows from the Shatto Place parking structure cover portions of Site 1 during the morning hours, and portions of the office buildings to the north during the afternoon hours. Existing shadows from Site 2 extend over the commercial uses on the west side of Vermont Avenue during the morning hours, fall on Site 1 at noon, and fall to the east over the office buildings to the north of the Shatto Place structure during the afternoon hours. Existing shadows from Site 3 cover a small portion of the residential building located to the northwest of Site 3 for a short time during the morning hours, cover a small portion of the commercial center to the north during portions of the morning and afternoon hours, and extend onto Vermont Avenue during the late afternoon hours. Except for the corner of the residential building shaded by the existing Site 3 building for a short period of time in the morning, existing shadows from Sites 1, 2 and 3 do not fall on any shadow-sensitive receptors during the winter solstice time frame.

**Regulatory Framework**

*County of Los Angeles*

There are no existing regulations or County ordinances related to shade and shadow that would apply to the Project.

*City of Los Angeles*

There are no existing regulations or City ordinances related to shade and shadow that would apply to the Project.

**ENVIRONMENTAL IMPACTS**

**Methodology**

The effects of shadows on land uses can be positive, such as cooling effects during warm weather, or negative, such as loss of warmth during cooler weather or loss of natural light. Shadow effects are dependent on several factors, including local topography, the height and bulk of a project’s structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of sensitive uses (such as residential, recreational, schools, and outdoor restaurants) in the surrounding area are identified and the shading effects are calculated according to the proposed building heights and the distance from the sun obstructing structures to the sensitive use.

Shadows have been calculated and plotted for representative hours during the spring and fall equinoxes and winter solstice. Residential, recreational, school, and outdoor restaurant land uses with routinely used outdoor areas and where sunlight may be important to physical comfort or function, are considered sensitive uses. The varying and seasonally adjusted daytime hours represent the period of the day in which the expectation of available sunlight exists. For the purpose of establishing the hours in which significant impacts may occur, winter and spring are described as occurring between late October to early April, and fall is described as occurring between early April and late October.6 Summer solstice shadows,

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6 *City of Los Angeles CEQA Thresholds Guide 2006.*
which occur in June, are shorter than the fall equinox shadows and are therefore not specifically considered in this analysis.

Graphical representations of the shadows that would be cast by the Project’s structures have been prepared and provide the basis for the shadow impact analysis in this Draft EIR.

Thresholds of Significance

Appendix G of the State CEQA Guidelines does not include a threshold related to shade/shadow.

The County does not have a numeric threshold for assessing shadow impacts. The County considers shade and shadow impacts significant when they cover shadow-sensitive uses for a substantial amount of time.

The City of Los Angeles, a Responsible Agency under CEQA for this Draft EIR, has adopted specific local thresholds for shading. The City considers that a project would have a significant shading impact if it would cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October).

While the County of Los Angeles is not required to utilize the City's local thresholds, the Lead Agency has evaluated those thresholds and has determined based on substantial evidence in the entire record that the application of the City’s shading threshold to this Project is appropriate and sufficient to analyze the potential significant environmental effects of the Project. The Project Sites are located in the City and development on the Project Sites would potentially affect off-site uses that are located wholly within the City limits. The City’s threshold is not inconsistent with the County’s, rather it would provide a more quantitative approach compared to the County’s qualitative threshold. Since the City’s threshold is more specific and stringent than the County threshold, the following threshold is used in the shade/shadow analysis for the Project.

Threshold 4.1.2-1: Would the Project cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October)?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

Project characteristics relevant to shade and shadow are discussed in Section 4.1.1, Aesthetics/Views, above. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their contribution to shading on and in the vicinity of the Project Sites. No specific Project Design Elements in regards to shade and shadow are proposed.

Impact Analysis

Threshold 4.1.2-1: Would the Project cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October)?
The Project would involve development of the Project Sites as described below.

**Site 1**

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helistop), and would consist of 21 stories. In addition, a new parking structure would be constructed on the site of the existing seven-story parking structure. This new structure would be approximately 11 stories, up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room).

**Site 2**

Proposed development on Site 2 would involve reuse and conversion of the existing 12-story DMH building into a 12-story, mixed use structure. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

**Site 3**

Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new six-story, senior affordable housing project. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

Shadow figures for buildout of the Project are as follows:

- Figure 4.1.2-1 (Project Equinox Shadows) depicts the maximum extent of the Project’s shadows during the spring and fall equinox between the hours of 8:00 AM and 4:00 PM.
- Figure 4.1.2-2 (Project Winter Solstice Shadows) depicts the maximum extent of the Project’s winter shadows between the hours of 9:00 AM and 3:00 PM.

**Equinox Shadows**

As shown in Figure 4.1.2-1, Project Equinox Shadows, Project buildings would cast shadows to the northwest in the morning, shifting to the northeast through the end of the day during the Spring and Fall Equinox.

At 8:00 AM, the spring/fall shadow from the new County office building on Site 1 would be cast in a northwesterly direction. The shadow would shade non-sensitive commercial uses on the west side of Vermont Avenue and would extend to the northern boundary of Site 3. Shadows from the new Shatto parking structure would extend onto Site 1 and the office building to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height and bulk of this building would not change, and would extend onto Vermont Avenue. Shadows from the new parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the residential buildings to the west of Site 3.

At 12:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northerly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend onto Site 1. Shadows from the new
parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3. These shadows would be completely off the residential uses to the west by 12:00 PM. Accordingly, the Site 3 building would not shade the shadow sensitive use for more than four hours. At 12:00 PM on the spring/fall equinox, no sensitive uses would be covered by shadows from Project buildings.

At 4:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northeasterly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1, and commercial and office uses located along Shatto Place to the northeast of Site 1. Shadows from the new County office building on Site 1 would not reach the residential uses located to the northeast of Site 1. Site 1 Shadows from the Shatto Place parking structure would extend onto the office buildings to the north and onto Shatto Place. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would fall within the shadow cast by the new County office building on Site 1. Shadows from the new parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3, its surface parking lot, and onto Vermont Avenue. No sensitive uses would be covered by these shadows at this time.

No sensitive uses would be covered by shadows from Project Site 1 or Project Site 2 buildings during the spring/fall equinox. Residential land uses to the west of Site 3 would not be shaded by the Project more than four hours between the hours of 8:00 AM and 4:00 PM during the spring/fall equinox. Consequently, spring/fall shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

**Winter Shadows**

As shown in Figure 4.1.2-2, Winter Solstice Shadows, Project buildings would cast shadows to the northwest in the morning, shifting to the northeast through the end of the day during the Winter Solstice.

At 9:00 AM, the winter shadow from the new County office building on Site 1 would be cast in a northwesterly direction. The shadow would shade residential and commercial uses on the west side of Vermont Avenue. Shadows from the Shatto Place parking structure would extend onto Site 1 and the office building to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend across Vermont Avenue onto commercial uses located west of Vermont Avenue. Shadows from the new parking structure and the mixed use building on Site 2 would extend onto Site 1 and a small portion of Vermont Avenue. Shadows from the new building on Site 3 would fall on the residential buildings to the west and northwest of Site 3.

At 12:00 PM, the winter shadows from the new County office building on Site 1 would be cast in a northerly direction. The shadow would shade the Galleria Market commercial building and the Islamic Center located to the north of Site 1. Shadows for the Site 1 County office building would be completely off the residential uses to the west by approximately 11:00 AM. Accordingly, the Site 1 building would not shade the shadow sensitive use for more than three hours. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend onto Site 1. Shadows from the new mixed use building with a parking structure on Site 2
would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3. These shadows would be completely off the residential uses to the west by 12:00 PM. Accordingly, the Site 3 building would not shade the shadow sensitive use for more than three hours. At 12:00 PM on the winter solstice, no sensitive uses would be covered by shadows from Project buildings.

At 3:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northeasterly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1, commercial and office uses located along Shatto Place to the northeast of Site 1, and would extend to the residential uses located to the northeast of Site 1. However, this shadow would fall on the residential area for less than three hours. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north and across Shatto Place onto office buildings and a small part of a surface parking lot located on the east side of Shatto Place. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would fall within the shadow cast by the new County office building on Site 1. Shadows from the new mixed use building with a parking structure on Site 2 would extend onto Site 1 and would fall within the shadow cast by the Shatto Place parking structure. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3, its surface parking lot, and across Vermont Avenue onto a commercial use located northeast of Site 3. No sensitive uses would be covered by these shadows at this time.

Residential land uses would not be shaded by the Project Sites for more than three hours between the hours of 9:00 AM and 3:00 PM. Consequently, winter shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

**CUMULATIVE IMPACTS**

The Project Sites and surrounding area are situated in a high-density, mixed-use area of the Koreatown/Mid-Wilshire community. Development of the Project, in conjunction with the related projects listed in Section 3.0, Project Description and Environmental Setting of this Draft EIR, would result in an increase of shading impacts in the Project vicinity. A cumulative shading impact may occur if a related project were constructed adjacent to or near the Project that resulted in a shadow overlap such that the new combined shadow would be cast upon shadow-sensitive uses in excess of the threshold. The related projects nearest to Sites 1 and 2 include Related Project 92 (605 S Vermont Avenue) and Related Project 114 (631 S Vermont Avenue). Related Project 92, located southeast of Site 2, would consist of a mid-rise building with 103 residential units and would cast shadows that would likely fall on commercial uses to the north of 6th Street, and onto Site 2. Related Project 114 is a high-rise Project located approximately 300 feet southwest of Site 2. Shadows from these projects would not overlap with the Project shadows because of the offset from Site 2. The related project nearest to Site 3 is Related Project 68 (427 W Berendo St). This project is located approximately 650 feet west of Site 3. Shadows from this project would not overlap with the Project shadows because of this offset. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to shade/shadow.

Regulatory Requirements

No Regulatory Requirements are related to shade/shadow impacts.

MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
4.1 AESTHETICS
4.1.3. LIGHT/GLARE

INTRODUCTION

This subsection addresses the effects of artificial light and glare (including nighttime illumination) and daytime glare on adjacent land uses cast by the Project buildings and cumulative artificial light and glare cast by existing development, other related development that may occur in the future near the Project Sites, and the Project. Artificial light impacts are typically associated with light during the evening and nighttime hours, and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Land uses such as residences and hotels are considered to be light sensitive because they are typically occupied by persons who have expectations for privacy during evening hours and who are subject to disturbance by bright light.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Glare is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, the following light/glare analysis is provided for informational purposes only.

ENVIRONMENTAL SETTING

Introduction

Artificial Light

The term “artificial light” in this analysis refers to man-made light. Artificial light sources are generally of two types, including:

1. point sources of light which include unshielded light sources (e.g., lenses or lamp reflectors); and
2. illuminated surfaces which may include light reflected off of the ground, walls, or trees.

Light-sensitive uses are those that light has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime environment. Residences are considered to be light-sensitive because they are typically occupied during the evening hours, and are occupied by persons who have reasonable expectations of non-interference in their activities. Artificial light sources can be invasive and interfere with residential privacy by intruding into an individual’s living environment, disrupting evening views, and changing neighborhood character. Additional light-sensitive
land uses may include, but are not limited to, board and care facilities, commercial or institutional land uses that require minimal nighttime illumination for proper function, physical comfort, or commerce and natural areas.

**Glare**

Glare is a lighting condition that causes an observer to experience visual discomfort as a result of high brightness. 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; 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 the Project Sites, the sun does not shine on glare sources from due north. In other words, when the sun reaches its highest point in the sky for the year (on the summer solstice), it is not located in a position where it would shine on the north faces of buildings or other sources of glare. Since the sun must shine on a reflective surface to be reflected back as glare, glare-sensitive uses in Los Angeles are not impacted by glare sources that are located to the south of the glare-sensitive use.

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). Lighting may also result in nighttime glare. Nighttime glare can be generated in any direction, so long as the glare sources (e.g., reflective buildings, automobile headlights, and special events lighting) and glare-sensitive uses are within close proximity (several hundred feet) to one another. As no adopted County or City policies exist regarding the measurement of reflective glare impacts, the determination of significance is generally subjective.

**Existing Conditions**

**Artificial Light**

The Project Sites are located in a well-lit urban area where there are high levels of ambient nighttime lighting, including street lights, building and security lights, indoor building illumination (light emanating from the interior of structures as it passes through windows) and automobile headlights. Artificial light impacts are largely a function of proximity. The Project Sites are located within an urban environment, so that light emanating from any one source contributes to, rather than is solely responsible for, lighting

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7 Mid- to high-rise structures that 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, from the perspective of an observer on earth, the sun is constantly moving, making reflective glare transitory. The larger the surface, the longer the sunlight can reflect on this surface, and the longer reflective glare can be generated.
impacts. Since development surrounding the Project Sites is already impacted by lighting from existing development, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any noticeable effect.

The Project Sites are developed with County office buildings, surface parking lots, and parking structures containing existing light sources that provide nighttime illumination. The Project Sites are generally surrounded by low- to high-intensity commercial, residential and institutional land uses. As such, the Project area, including the Project Sites, already provides high levels of ambient nighttime lighting. The surrounding low- to mid-rise commercial buildings and parking lots contain multiple ambient light sources, including interior uses, exterior security light, and signage. Additionally, along the roadways adjacent to the Project Sites, Vermont Avenue and 6th Street, a high level of artificial lighting currently exists that is typical of major streets. Lighting along these roadways includes street lights, illuminated signage, interior/exterior building light, outdoor activity lights, parking lot lights, security lights, and vehicle headlights.

The nearest sensitive land uses are multi-family residences located to the west and northwest of Site 3, and west and south of Site 2. These land uses presently experience high levels of ambient light typical of the surrounding urbanized area. These land uses also experience light levels generated from the existing light on Project Site 2 and Project Site 3, and perceive the ambient glow that is generated by the surrounding land uses, including the nearby low- to mid-rise buildings.

**Glare**

Sources of glare in the vicinity of the Project Sites include building windows, light-colored building surfaces and cement parking lots, metal surfaces, and car windshields. Receptors sensitive to daytime glare from reflected sunlight include motorists traveling on the roadways, and the surrounding residential uses. At the Project Sites, the primary sources of glare are windows in the existing buildings, and automobiles located in surface parking lots.

**Regulatory Framework**

**County of Los Angeles**

Other than specified areas such as Rural Outdoor Lighting Districts (Los Angeles County Code, Section Chapter 22.44.500), and within the Coastal Zone (Los Angeles County Code, Section 22.44.1270), the County has not established specific standards for exterior lighting. The County has not established specific standards related to glare.

County Code Section 12.12.030 limits the hours of construction projects to 6:30 AM to 8:00 PM, Monday through Saturday. Construction is prohibited on Sundays.

**City of Los Angeles**

Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units.

3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

In addition, pursuant to LAMC 17.08.C, plans for street lighting shall be submitted to and approved by the City’s Bureau of Street Lighting, which maintains a list of general street lighting standards that would be applicable to the Project, including:

- addressing the need for determination of roadway and sidewalk illumination levels in accordance with Illuminating Engineers Society (IES) standards and adopted City standards;
- the necessity for equipment testing and approval of the Bureau of Street Lighting;
- mandatory street tree placement at least 20 feet from existing or proposed streetlights; and
- the minimization of glare and light impacts on private off-site property.

Pursuant to LAMC Section 41.40, construction activities in the City are limited to 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday.

ENVIRONMENTAL IMPACTS

Methodology

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient lighting conditions in the Project area. The analysis evaluates the Project’s proposed light and glare sources and the extent to which Project lighting may spill off the Project Sites onto off-site light-sensitive uses. The analysis also describes the affected street frontages, the direction in which light would be focused, and the extent to which the Project would illuminate off-site sensitive land uses. In addition, the analysis considers the potential for sunlight to reflect off of building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

Thresholds of Significance

The following threshold question has been included in accordance with guidance provided in Appendix G to the State CEQA Guidelines:

Threshold 4.1.3-1: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

Project characteristics relevant to light and glare are discussed in Section 4.1.1, Aesthetics/Views, above. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their
contribution to light and glare on and in the vicinity of the Project Sites. Design of lighting sources for Project buildings would include shielding of light fixtures to focus light downward and minimize light trespass onto neighboring properties. Design of Project buildings would also not include highly reflective building materials such as mirrored glass in exterior façades. Site 2 development would follow the City of Los Angeles regulations Chapter IX, Article 3, Section 93.0117(b) of the LAMC related to lighting as discussed above.

Impact Analysis

Threshold 4.1.3-1: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Artificial Light

Construction

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlight focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction light would be to increase the overall ambient glow emanating from the Project Sites. This analysis assumes that construction hours would follow County requirements for Sites 1 and 3, and City requirements for Site 2, and would generally be from 6:30 AM to 8:00 PM, Monday through Saturday (Sites 1 and 3), and 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday (Site 2). Construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours when daylight is no longer sufficient. In addition, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Sites boundary. As the lighting would be shielded and limited to specific hours, Project construction lighting would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Operation

The Project would have the potential to alter nearby lighting patterns. Nighttime sources of light from Project buildings and operations would include interior and exterior building lights, parking structure and other security lighting, and vehicle headlights. Project lighting for the entryways to the buildings would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits for the buildings and the parking structures and would remain on from dusk to dawn, but would be designed to minimize light trespass onto adjacent properties. Illuminated areas near the building and parking structure entry/exits would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Furthermore, the majority of lighting associated with the Project would be directed internal to the Project Sites, away from neighboring land uses. As a result of distance from adjacent uses, interior and exterior lights on the Project Sites would not shine directly onto light-sensitive uses, and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because
it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Although additional light associated with the Project could incrementally add to the ambient glow of the Project Sites and surrounding area, the area already has high ambient light levels, including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures as it passes through windows) and automobile headlights. Given the high levels of existing ambient lighting, the Project’s contributions to ambient glow likely would not be perceptible from the nearby sensitive receptors across West 6th Street, approximately 90 feet from the Project Sites. In general, light dissipates over distance. As such, lighting from the Project would not result in substantial changes to existing artificial light conditions, and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

**Glare**

The Project would increase the use of reflective materials such as glass compared to current conditions. Sources of glare that may cause daytime glare include exterior building materials, such as glass and metallic façade materials and finishes. The increased glare associated with this building material could increase the amount of glare that the surrounding commercial, retail and residential land uses experience compared to existing conditions. However, Project design would incorporate the use of low-reflectivity materials that would assure that Project impacts would be less than significant. Examples of commonly used non-reflective building materials include cement, plaster, concrete, wood, coated steel, and non-mirrored glass.

Existing sources of daytime glare on the Project Site (i.e., cars in the surface parking lots that contain light-colored cars, car mirrors, and windshields) would be replaced with less reflective surfaces of building facades and windows, which would result only in a transitory glare condition from certain perspectives during the day. To address daytime glare conditions, glass used in building façades shall be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, daytime glare attributable to the Project Sites would be controlled. Project development would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Sites or interfere with the performance of an off-site activity. As such, the Project would not include substantial amounts of reflective building materials that would adversely affect day or nighttime views of off-site glare-sensitive uses located on West 6th Street and Shatto Place. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Project buildings would not result in substantial sources of auto headlight-related glare in close proximity to glare-sensitive land uses. The Site 1 office building would be primarily a daytime use, while the auto entrances to residential uses on Sites 2 and 3 would be provided from 6th Street and Vermont Avenue, respectively, streets which already experience high levels of nighttime traffic. Overall, additional nighttime glare introduced to the Project Sites would be comparable to that of adjacent land uses and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
CUMULATIVE IMPACTS

As indicated in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are 115 related projects in the vicinity of the Project Sites. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, and hotel developments. There are 3 related projects located near the Project Sites. These proposed developments comprise a variety of uses, including apartments, as well as mixed-use developments, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Wilshire Community Plan Area, which will likely entail general increases in light and glare throughout the area.

Cumulative impacts regarding light and glare may occur if any of the related projects are located in close enough proximity to the Project Sites to combine with the Project and result in significant adverse changes in the surrounding area. As shown in Figure 3-22 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are three related projects that are located sufficiently close to the Project Sites: Related Project No. 68, No. 84, and No. 92. The existing level of ambient lighting in the Project area is high, due to the high density of development that is already present. The Project, in combination with the Related Project No. 68, no. 84, and No 92, would increase ambient light levels from buildings and signage. However, the incremental increases would not be notable in the context of the high density urban setting, which already experiences high levels of ambient light and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

The Project would remove existing sources of glare emanating from surface parking lots. Furthermore, the facade of Project’s building would be clad primarily with high-quality building materials and low- or non-reflective glass, which would produce only transitory glare at certain times of the day. It is anticipated that, like the Project, new buildings developed as part of the related projects would be clad primarily with high-quality building materials and low- or non-reflective glass. Furthermore, the effects of any new glare sources would be transitory and would not disrupt off-site activities or adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

PDF LG-1: Project outdoor lighting shall be designed and installed with shielding from adjacent residential properties, the public right-of-way, and from above.

PDF LG-2: All Project buildings, parking structures, and signage within the Project Sites shall be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Exterior materials, including glazing shall have Visible Light Reflectance (Exterior) of 34 percent or less.
4.1.3 Aesthetics – Light/Glare

Regulatory Requirements

The following Regulatory Requirement is applicable to Site 2 only.

RR LG-1: Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source:

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

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

3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.