IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. Aesthetics

1. Introduction

This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community, identifies applicable laws, regulations, guidelines and policies relating to aesthetics, and evaluates potential aesthetic impacts related to implementation of the Project.

The following provides an overview of the environmental topics related to aesthetics that are evaluated in this section of the Draft EIR.

a. Scenic Vistas

The term "scenic vista" generally refers to visual access to, or the visibility of, a particular site from a given vantage point or corridor. The City of Los Angeles (City) recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning of a broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

b. Scenic Resources

Scenic resources refer to natural or man-made features of high aesthetic quality. Such features can include landscaping, heritage trees, or natural trees and landforms, as well as historic buildings and other structures with aesthetic value. Pursuant to California Environmental Quality Act (CEQA) Guidelines Appendix G, this area of consideration includes specific mention of such natural or man-made features when they are located within the viewshed of a State scenic highway.

c. Scenic Quality

Scenic quality refers to the visual appeal of an area and is informed by features that contribute to overall aesthetic character. Aesthetic features may include unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The City has plans, policies and regulations that are relevant to the assessment of scenic quality, such as requirements for street trees, building setbacks, building heights, exterior lighting and signage.

d. Light and Glare

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

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

2. Environmental Setting

a. Regulatory Framework

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

- Senate Bill 743
- Assembly Bill 1560
- California Scenic Highways
- California Historic Parkways
- California Building Standards Code

- California Vehicle Code
- General Plan Framework Element
- General Plan Conservation Element
- General Plan Transportation Element (Mobility Plan 2035)
- Central City North Community Plan
- Los Angeles Municipal Code
- Citywide Design Guidelines

(1) State

(a) Senate Bill 743

Senate Bill (SB) 743, codified within the Public Resources Code (PRC) Section 21099 et. seq., states that "Aesthetic (…) impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (PRC Section 21099(d) (1)). If a project meets these conditions, aesthetic impacts associated with the project would not be considered significant. In addition, City of Los Angeles Zoning Information File No. 2452 (ZI No. 2452) states that projects meeting SB 743 criteria are exempted from a determination of significant impacts on aesthetic resources (scenic vistas, scenic resources, aesthetic character, and light and glare) as outlined in CEQA Guidelines Appendix G. However, ZI No. 2452 requires that projects in transit priority areas (TPAs) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality. Pursuant to PRC Section 21099, aesthetic impacts do not include impacts to historic or cultural resources. Such impacts are evaluated pursuant to CEQA in Section IV.C, Cultural Resources, of this Draft EIR.

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

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

- "Major transit stop" is defined by PRC Section 21064.3 to include any of the following:

  a) An existing rail or bus rapid transit station.

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

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

Projects that meet the criteria set forth in PRC Section 21099(d) are exempt from findings of significance related to aesthetic impacts, including view, visual quality, and light and glare impacts as described in the CEQA Guidelines Appendix G questions used by the City as thresholds of significance related to aesthetics.

(b) Assembly Bill 1560

AB 1560, codified at PRC Section 21060.2, supplements PRC Section 21064.3 by defining "bus rapid transit" and "bus rapid transit station" as it relates to a major transit stop. Specifically, "bus rapid transit" means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

- Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- Transit signal priority.
- All-door boarding.
- Fare collection system that promotes efficiency.
- Defined stations.

Lastly, "bus rapid transit station" is defined within PRC Section 21060.2 as a clearly defined bus station served by a bus rapid transit.

(c) California Scenic Highways

Appendix G of the CEQA Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such, the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, Section 260 et seq. The intent of the system is to establish the State's responsibility for the protection and enhancement of California's natural scenic

beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. The only State Scenic Highway within the City of Los Angeles includes portions of the Topanga Canyon State Scenic Highway (State Route [SR] 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park. Note that road segments within the City of Los Angeles that are listed as "eligible" for scenic highway designation in the Scenic Highway System List, such as the Pacific Coast Highway, do not fit the CEQA criteria for State scenic highways.

(d) California Historic Parkways

Streets & Highways Code, Section 280 regulates the designation and maintenance of the system of California Historic Parkways. In order to be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

The only designated Historic Parkway within the City of Los Angeles, the Arroyo Seco Parkway (SR-110), runs northeasterly from the four-level interchange with US 101 just outside of downtown Los Angeles (milepost 23.69) to East Glenarm Street in the City of Pasadena (milepost 31.89).[1] The Arroyo Seco Parkway is located between 0.13 and 0.35 miles to the northwest of the Project Site depending upon the specific location within the Project Site. The Arroyo Seco Parkway is also a National Civil Engineering Landmark and a National Scenic Byway.

[1] *National Parks Service, Arroyo Seco Parkway, www.nps.gov/places/arroyo-seco-parkway.htm, accessed February 11, 2025.*

(e) California Building Standards Code

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

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

(2) City of Los Angeles

(a) General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan.[2] The Framework Element provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development.[3] Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The Framework Element also states that the livability of all neighborhoods would be improved by upgrading the

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

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

quality of development and improving the quality of the aesthetics and visual appearance of the urban environment immediately surrounding the Project (Objective 5.5).[4]

Chapter 5 of the Framework Element, Urban Form and Neighborhood Design, establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods. "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. The land use forms and spatial relationships identified in the Framework Element are discussed in Section IV.I, Land Use and Planning, of this Draft EIR. To the extent the policies included therein relate to the appearance of development, Project consistency with these policies is analyzed later in this section. The Project's consistency with the Framework Element is provided in Section IV.I, Land Use and Planning, of this Draft EIR. The aesthetics goals, objectives, and policies of the Framework Element that are applicable to the Project are discussed under Threshold (c) later in this section.

(b) General Plan Conservation Element

The City's various landforms and scenic vistas are described in the General Plan Conservation Element. The hills and mountains within the City, and the Los Angeles River and its associated tributaries and floodplains, are identified as prominent topographic features. The Conservation Element defines scenic vistas or vistas as the "panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features."[5] To the extent the policies included in the Conservation Element relate to aesthetics, Project consistency with these policies is discussed later in this section.

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

Mobility Plan 2035 (adopted in 2016) provides an inventory of City-designated scenic highways. Scenic highways depicted in the City have special controls for protection and enhancement of visual resources. City-designated scenic highways are discussed further below.

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[4] *City of Los Angeles Department of City Planning, General Plan Framework, Chapter 5, Goal 5A, Objective 5-5, originally adopted December 11, 1996, and readopted August 8, 2001.*

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

(d) Central City North Community Plan

The 35 community plans established throughout the City collectively comprise the Land Use Element of the City's General Plan. Community plans are intended to implement the policies of the Framework Element. Community plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land uses.

The Project Site is located within the Central City North Community Plan (Community Plan) area.[6] The Community Plan identifies goals, objectives, and policies related to aesthetics for each land use type (residential, commercial, etc.) along with a set of separate urban design standards applicable to new development in the community plan areas. The aesthetics-related goals, objectives, policies and standards of the Community Plan applicable to the Project are discussed in the impact analysis under Threshold (c) later in this section.

The City of Los Angeles recently updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (also known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan or Downtown Community Plan. Ordinances implementing the Downtown Community Plan were adopted in December 2024 and became effective on January 27, 2025. However, the applicable regulatory framework for the Project is the Central City North Community Plan as it was the governing applicable land use plan at the time the City deemed the Project's application complete.

(e) Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) regulates all aspects of building development in the City, including aesthetic aspects, such as lighting and signage. Several of the provisions in the LAMC that are applicable to the Project are described below.

- Chapter I, Article 2, Section 12.21 A.5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter I, Article 4.4, Section 14.4.4 E. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter I, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

[6] *City of Los Angeles, ZIMAS Parcel Profile Report for the Project, February 12, 2025.*

- Chapter IX, Article 3, Division 1, Section 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two-foot candles (21.5 lx) of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminance or insufficiently shielded light sources that are in the field of view.

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

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

  3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.[7]

(f) Citywide Design Guidelines

Adopted in 2019, the Citywide Design Guidelines (Guidelines) establish ten guidelines and various best practices to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. The Guidelines are organized around one of three design approaches and consist of the following general design direction:

- Pedestrian-First Design
  - Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
  - Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
  - Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.
- 360 Degree Design
  - Guideline 4: Organize and shape projects to recognize and respect surrounding context.

[7] *Certain exceptions apply related to frosted light sources emitting 800 lumens or less, other sources emitting 800 lumens or more not visible to persons on other residential properties, tennis or paddle tennis courts conforming to certain standards, certain temporary decorative lights, emergency lights, agency controlled light sources, and light sources a minimum distance of 2,000 feet from residential uses.*

  - Guideline 5: Express a clear and coherent architectural idea.
  - Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
  - Guideline 7: Carefully arrange design elements and uses to protect site users.
- Climate-Adapted Design
  - Guideline 8: Protect the site's natural resources and features.
  - Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.
  - Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Guidelines apply to all new development and substantial building alterations that seek a discretionary action for which the Department of City Planning has design authority. Projects that are subject to the Guidelines will need to include as part of their application a written statement that describes how their project complies with each of the ten guidelines. Compared to the Zoning Code and other regulations governing the development of a particular property, the Guidelines are intended as a more flexible, less prescriptive means of shaping proposed projects and conveying general design expectations.

b. Existing Conditions

The Project Site is comprised of approximately 8.08 acres and is partially developed, with portions of the Project Site currently used transportation operations and maintenance-related facilities, bus parking and construction staging.[8] The Project Site's topography consists of a south-facing vegetated sloped area that spans from the North Parcel to the South Parcel until reaching the vicinity of Mandarin Plaza, at which point the South Parcel becomes mostly paved. The sloped area faces towards Metro A Line tracks and the Los Angeles State Historic Park and consists mainly of bare ground with limited vegetation, containing remnants of concrete foundations/footings, and retaining walls. Chain link fencing is located along the perimeter of the Project Site between North Broadway and the Metro A Line tracks. The Project Site includes 20 existing on-site trees, consisting of Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), and desert fan palm (*Washingtonia filifera*), and three street trees, consisting of jacaranda trees (*jacaranda mimosafolia*), which are not protected under the City's Protected Tree and Shrub Regulations (Ordinance

[8] *The Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of 7.87 acres.*

No. 186,873).[9] Further, the Project Site has 13 static billboards along North Broadway, including three billboards on the South Parcel and 10 billboards on the North Parcel.

The South Parcel is largely paved and partially developed with structures associated with transportation- and maintenance-related facilities, including an approximately 12,800-square-foot rectangular one-story metal auto repair building located in the southern portion of the South Parcel, with vehicle bays and roll-up doors, as well as a vehicle shelter/wash bay, trash enclosure, paved surface parking areas, paved outdoor storage yard, utility infrastructure, retaining walls, concrete foundations/footings, and fencing. Additionally, an approximately 2,132-square-foot addition to the rear of an existing off-site restaurant (the Golden Dragon Restaurant) and associated parking that encroaches onto the Project Site is located in the southwestern portion of the South Parcel. The North Parcel includes foundation remnants and graded areas and is generally used for construction staging and bus parking. There are no existing buildings on the North Parcel.

The Zanja Madre (the "Mother Ditch"), a subsurface brick conduit constructed in 1781, was the first irrigation ditch, which would eventually be expanded into a complex network of irrigation ditches to convey water from the Los Angeles River to the El Pueblo de Los Angeles and local agricultural lands. A portion of the Zanja Madre is exposed at grade within the Metro property generally across from Bishops Road near the narrowest portion of the Project Site. Through investigations as a part of this Draft EIR, a portion of the Zanja Madre has been identified in the southern portion of the Project Site and is further discussed in Section IV.C, Cultural Resources of this Draft EIR.

The Project Site is designated as Light Industrial by the Community Plan and is zoned as MR2-1 (Restricted Light Industrial) by the LAMC. The MR2 zone corresponds to the Project Site's Light Industrial land use designation. The MR2 zone allows for various industrial and manufacturing uses, as well as uses permitted under the MR1 zone, including commercial manufacturing and limited commercial uses. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District 1. All uses located in the MR2-1 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property's buildable area. Height District 1 does not impose a vertical height limitation on the Project Site.

The Project Site is located within the Santa Monica Mountains Zone (SMMZ) within the City, as specified in PRC Section 33105, and mapped by the Santa Monica Mountains Conservancy (SMMC).

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[9] *The Tree Resource, 2016 Tree Report, 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum. See Appendix A of this Draft EIR.*

As shown in Figure II-2 in Section II, Project Description, of this Draft EIR, the Project Site is located within an urbanized area and includes a mix of land uses located north of Downtown Los Angeles within the vicinity of the Chinatown neighborhood. The Project Site is adjacent to the Metro A Line tracks to the southeast. The South Parcel is located approximately 400 feet north of the Metro A Line Chinatown Station. The Los Angeles State Historic Park (formerly Cornfield Park) contains 32 acres of active and passive open spaces and recreational amenities, located to the southeast of the Metro A Line tracks.[10] The Capitol Milling Company is located south of the Project Site and includes retail uses, restaurants, and offices. Various industrial, commercial, and warehouse uses are located along the southeastern side of North Spring Street and along Baker Street. A channelized portion of the Los Angeles River is located approximately 575 feet east of the northeastern most portion of the Project Site. The South Parcel is largely located behind Mandarin Plaza commercial center, which includes one- and two-story commercial buildings and a two-level parking structure located along the frontage of North Broadway. Northwest of the Project Site across North Broadway are various commercial uses, a high school, religious centers, surface parking lots, multi-family residences, and vacant lots. In addition, located across North Broadway is the approximately 600-acre Elysian Park, Radio Hill Gardens, and the Solano Canyon residential neighborhood, which includes single- and multi-family homes. Dodger Stadium is also located approximately 0.45 miles to the northwest of the Project Site.

The Project is a mixed-use residential project located within an infill site. The Project Site is also located on a site listed as a TPA by ZIMAS and the majority of the Project Site is identified by SCAG's 2024–2050 RTP/SCS as a TPA.[11,12] However, a portion of the North Parcel is located farther than one-half mile from the closest major transit stop and more than 10 percent of the residential units in the Project are farther than one-half mile from the major transit stop. Thus, per ZI 2452, the Project does not meet the one-half mile requirement for a TPA project under SB 743. As such, an analysis of aesthetics has been provided in this section of the Draft EIR.

(1) Scenic Vistas and Public Views in Project Vicinity

As indicated previously, the term "scenic vista" generally refers to visual access to, or the visibility of, a particular site from a given vantage point or corridor. The City recognizes the value of preserving sightlines (view access) to designated visual resources or subjects of visual interest from public vantage points.

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[10] *California State Parks, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 10, 2005, p. 3.*

[11] *City of Los Angeles, ZIMAS Parcel Profile Report for the Project, December 13, 2024.*

[12] *SCAG, 2050 Transit Priority Areas (TPAs)—SCAG Region, https://hub.scag.ca.gov/datasets/10edc64279ff4ebeb99a191161416422_0/explore?location=34.060478%2C-118.227490%2C14.77, accessed January 16, 2025.*

Visual resources in the Project vicinity include Elysian Park, the Los Angeles State Historic Park, the Downtown Los Angeles skyline, mature trees, and historical resources. In addition, City-designated scenic roadways in the Project vicinity include portions of SR-110 and Stadium Way, which have been designated by the Central City North Community Plan as a Scenic Freeway and Scenic Collector Highway, respectively. Visibility of the Project Site from SR-110 is limited by distance, topography, existing mature trees and vegetation, freeway walls, tunnels, and existing buildings, and further, is not part of the scenic resource that led to the designation of the Scenic Freeway and Scenic Collector Highway. In addition, due to distance, topography and existing buildings and trees, views of the Project Site are generally limited to the portions of Stadium Way that are closest to the Project Site.

Due to surrounding topography there are public locations from which the Project Site is visible. To evaluate the extent to which there are public scenic vistas, numerous public view locations were evaluated. Specifically, based on field visits and imaging available on-line, 10 representative public views were analyzed (Viewpoints 1 through 10 as identified in Figure IV.A-1 on page IV.A-14) as they are intended to represent a range of public viewpoints within the Project Site vicinity. Descriptions of these public viewpoints are provided below.

- Viewpoint 1 (Lookout Drive): As shown in Figure IV.A-2 on page IV.A-15, Viewpoint 1 has an elevated southeasterly public view of the South Parcel along Lookout Drive located to the northwest of the Project Site. Views include distant hills in the background, and the foreground includes a variety of building types, mature trees, Stadium Way and SR-110. Intervening buildings and trees block views of the existing uses on the Project Site from this viewpoint.

- Viewpoint 2 (Spring Street—South): As shown in Figure IV.A-3 on page IV.A-16, Viewpoint 2 is located to the south of the Project Site along North Spring Street looking west. Views include the Elysian Hills in the background on the right, and the Downtown Los Angeles skyline in the background on the left. The foreground includes views of North Spring Street and the Los Angeles State Historic Park. Intervening vegetation blocks views of the existing uses on the Project Site from this viewpoint.

- Viewpoint 3 (Spring Street—North): As shown in Figure IV.A-4 on page IV.A-17, Viewpoint 3 is a view located to the south of the North Parcel along North Spring Street looking east. The Rose Hills neighborhood is visible in the background on the right, and the Elysian Hills are visible in the midground within the center and left of photograph. North Spring Street and the Los Angeles State Historic Park comprise the foreground. Intervening vegetation obstructs views of the existing uses on the Project Site from this viewpoint.

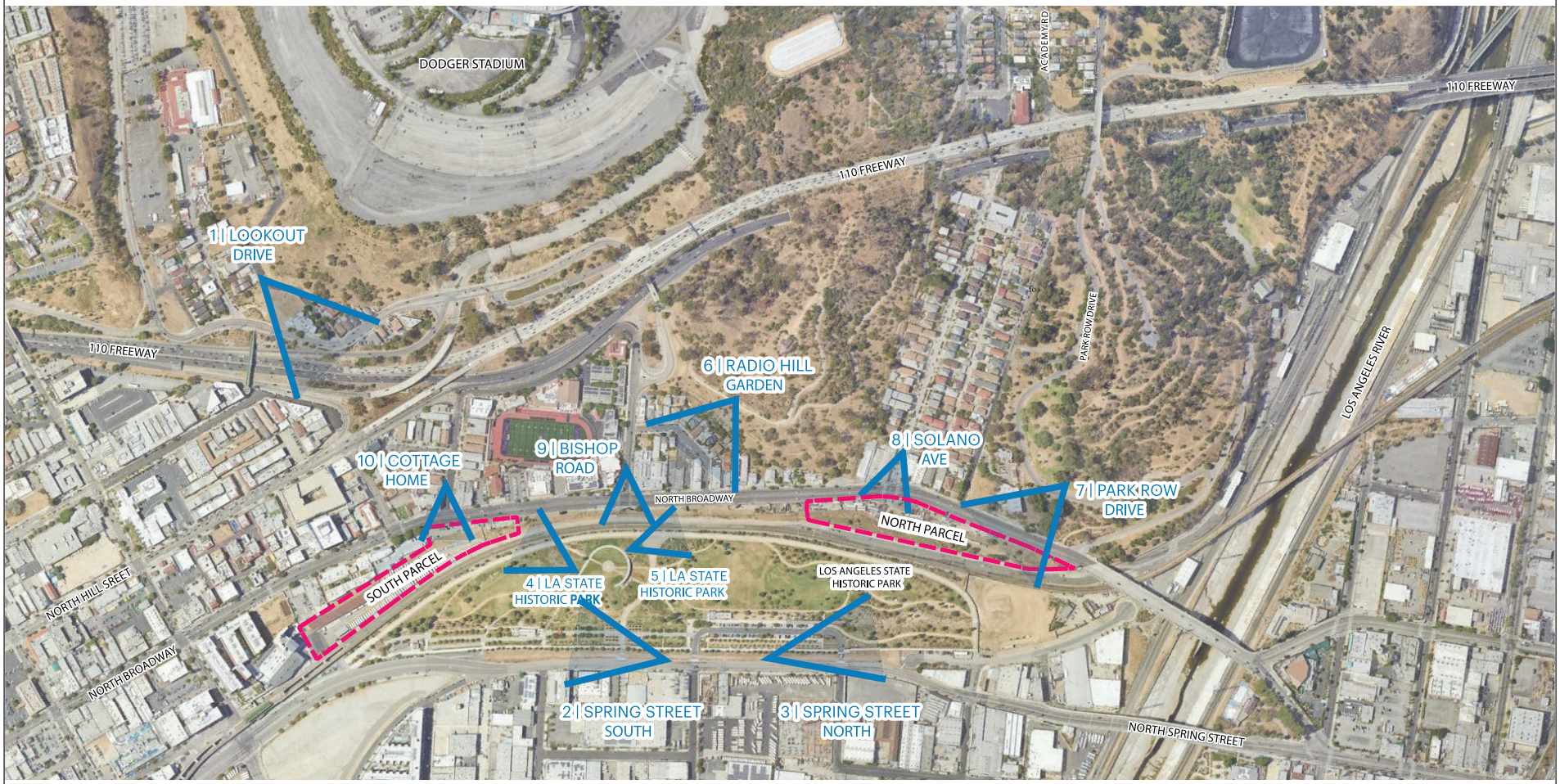

Figure IV.A-1
Viewpoint Location Map

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-2
Viewpoint 1 – View of the South Parcel
Looking Northeast from Lookout Drive

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-3
Viewpoint 2 – View of the South Parcel Looking West from North Spring Street at Sotello Street

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-4
Viewpoint 3 – View of the North Parcel Looking East along North Spring Street North of Sotello Street

Source: RIOS, 2025.

- Viewpoint 4 (Los Angeles State Historic Park—1): As shown in Figure IV.A-5 on page IV.A-19, Viewpoint 4 is a view of the South Parcel from within the Los Angeles State Historic Park looking west. Views include the Downtown Los Angeles skyline in the background and the Los Angeles State Historic Park within the midground and foreground. The South Parcel is visible on the center and right side of the view.

- Viewpoint 5 (Los Angeles State Historic Park—2): As shown in Figure IV.A-6 on page IV.A-20, Viewpoint 5 is a view of the North Parcel from within the Los Angeles State Historic Park looking east. Views include the distant Rose Hills neighborhood in the background on the right, and Elysian Park, the Metro rail tracks, and structures along North Broadway in the midground. The Los Angeles State Historic Park is shown in the midground and the foreground. The North Parcel is visible on the center of the view. Intervening vegetation obstructs portions of the view of the North Parcel from this viewpoint.

- Viewpoint 6 (Radio Hill Gardens): As shown in Figure IV.A-7 on page IV.A-21, Viewpoint 6 has an elevated expansive southwesterly public view of the South Parcel from within the Radio Hill Gardens within Elysian Park. The view includes the Downtown Los Angeles skyline in the background on the right. The Los Angeles State Historic Park and buildings along North Broadway are located in the midground, and vegetation is located along the slope within the foreground. Portions of the Project Site are visible in the midground.

- Viewpoint 7 (Park Row Drive): As shown in Figure IV.A-8 on page IV.A-22, Viewpoint 7 has an elevated southwesterly public view of the South Parcel from Elysian Park located to the northeast of the Project Site. Views include the Downtown Los Angeles skyline in the background, the Los Angeles State Historic Park and the South Parcel in the midground and Elysian Park and multi-family residential uses in the foreground.

- Viewpoint 8 (Solano Avenue): As shown in Figure IV.A-9 on page IV.A-23, Viewpoint 8 has an elevated southerly public view of the southern portion of the North Parcel from Solano Avenue north of the Project Site. Industrial uses south of the Los Angeles State Historic Park are visible in the background. The North Parcel and North Broadway comprise the midground and foreground. Due to topography, the Los Angeles State Historic Park, which is at a lower elevation than North Broadway, is generally not visible from this viewpoint.

- Viewpoint 9 (Bishops Road): As shown in Figure IV.A-10 on page IV.A-24, Viewpoint 9 has an elevated southerly public view of the central portion of the Project Site between the North Parcel and South Parcel from Bishops Road located to the north of the Project Site. Industrial uses south of the Los Angeles State Historic Park and high-rise government buildings within the northern edge of Downtown Los Angeles are visible in the background. Due to topography, only a portion of the Los Angeles State Historic Park is visible from this viewpoint. Two large billboard signs dominate the foreground.



Current



Proposed

Figure IV.A-5
Viewpoint 4 – View of the South Parcel Looking West from within the Los Angeles State Historic Park

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-6
Viewpoint 5 – View of the North Parcel Looking East from within the Los Angeles State Historic Park

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-7
Viewpoint 6 – View of the South Parcel Looking Southwest from Radio Hill Gardens within Elysian Park

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-8
Viewpoint 7 – View of the South Parcel Looking Southwest along Park Row Drive East from Buena Vista Hill within Elysian Park

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-9
Viewpoint 8 – View of the South Parcel Looking South along Park Row Drive East from Buena Vista Hill within Elysian Park

Source: RIOS, 2025.



Current



Proposed

Figure IV.A-10
Viewpoint 9 – View of the Project Site between the North and South Parcels Looking South from Bishops Road

Source: RIOS, 2025.

- Viewpoint 10 (Cottage Home Street): As shown in Figure IV.A-11 on page IV.A-26, Viewpoint 10 is a view of the northern portion of the South Parcel from Cottage Home Street looking south. Industrial uses south of the Los Angeles State Historic Park and high-rise multi-family residential buildings are visible in the background. North Broadway, a large billboard sign, and trees within the Los Angeles State Historic Park comprise the midground, and Cottage Home Street at North Broadway and an adjacent low-rise building comprise the foreground.

(2) Scenic Resources

As described above, scenic resources refer to natural or manmade features of high aesthetic quality, such as landscaping, natural trees (including heritage trees), landforms, historic buildings, and other structures with aesthetic value within a State scenic highway. As discussed above, the Project is not located within the vicinity of a State-designated scenic highway.

As described above, SR-110 is a designated Historic Parkway that is located between 0.13 and 0.35 miles to the northwest of the Project Site depending upon the specific location within the Project Site. In addition, the Community Plan designates portions of SR-110 and Stadium Way as a Scenic Freeway and Scenic Collector Highway, respectively. The Mobility Plan 2035 also identifies Stadium Way from SR-110 to I-5, winding through Elysian Park, as a Scenic Collector Highway.

While not located within the vicinity of a State-designated scenic highway, visual resources in the Project vicinity include the elevated portions of Elysian Park to the north, the Los Angeles State Historic Park to the south, the Downtown Los Angeles skyline to the southwest, various historic buildings, and mature trees.

(3) Scenic Quality

As discussed above, scenic quality refers to the visual appeal of an area and is informed by features that contribute to overall aesthetic character. Aesthetic features may include unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. As described above, in Section 2.a, Regulatory Framework, the City has numerous plans, policies and regulations that are relevant to the assessment of scenic quality.

(4) Light and Glare

Given the types of uses in the vicinity of the Project Site, existing nighttime light levels are characterized as medium brightness. Artificial nighttime light levels in the vicinity of the Project Site are associated with the nearby commercial, industrial, and residential uses, which typically utilize moderate levels of exterior lighting for security, signage, parking, architectural



Current



Proposed

Figure IV.A-11
Viewpoint 10 – View of the Northern Portion of the South Parcel Looking Southeast from Cottage Home Street

Source: RIOS, 2025.

building highlighting, and landscaping. Other exterior lighting sources include billboard signs, pole-mounted street lights, as well as vehicle headlights along adjacent streets. Interior lighting from windows of the nearby buildings also contribute to the ambient artificial light levels.

Daytime glare is generally associated with reflected sunlight from buildings with highly reflective surfaces, such as glass, shiny surfaces, and metal. The existing buildings on the Project Site presently do not generate substantial glare. The Project Site also includes surface parking lots with minimal sources of glare, such as daytime glare emanating from sunlight reflecting off parked vehicles within the Project Site. However, these glare sources are not considerable in the context of the urban environment.

In the immediate vicinity of the Project Site, the nearest off-site receptors that are considered sensitive relative to light and glare include existing multi-family residential uses and motel uses located to the north of the Project Site across North Broadway. Motorists traveling along roadways in the vicinity of the Project Site may also be sensitive to daytime glare.

With regard to shading, the closest public gathering spaces to the Project Site that could be sensitive to shading include the Los Angeles State Historic Park to the south, Elysian Park to the north, and Chinatown Central Plaza to the west.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to aesthetics if it would:

Threshold (a): Have a substantial adverse effect on a scenic vista; or

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

Threshold (c): In non-urbanized areas, substantially degrade the exiting visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project

conflict with applicable zoning and other regulations governing scenic quality;[13] or

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

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

(a) Scenic Vistas

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

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

(b) Scenic Resources within a Designated State Scenic Highway

As discussed above, the Project is not visible from a designated State-designated scenic highway. As such, no impacts would occur, and no further analysis of this topic is necessary. In addition, refer to the discussions for Threshold (c) regarding scenic quality with regard to Project impacts associated with scenic highways designated by the Community Plan and Mobility Plan and the Project's impacts associated with the historic Arroyo Seco Parkway.

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[13] *Pursuant to California Public Resources Code Sections 21060 and 21071, for purposes of CEQA an "urbanized area" means "(a) an incorporated city that meets either of the following criteria: (1) has a population of at least 100,000 persons, or (2) has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." CEQA Guidelines Section 15191(m) similarly defines an urbanized area as "[a]n incorporated city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons." The Project Site is located in the City of Los Angeles which is an incorporated city with a population of greater than 3.8 million people. Thus, the City has determined that the form of Threshold (c) applicable to urbanized areas is the most appropriate threshold for this analysis.*

(c) Scenic Quality

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

(d) Light and Glare

Light and glare impacts are typically associated with outdoor artificial light (including from motor vehicles) and glare associated with high contrast of light as discussed above. Glare may also be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Accordingly, the analysis of this impact category will include a consideration of the following factors set forth in the Thresholds Guide:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

(e) Shade and Shadow

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

b. Methodology

(1) Scenic Vistas

The assessment of impacts to a scenic vista focuses on the anticipated changes to existing scenic vistas with views of visual resources available from the representative public views in the vicinity of the Project Site. Scenic vistas were identified through review of the relevant plans, including the Community Plan, numerous field visits to the Project Site vicinity, and review of satellite imagery available on-line.

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

(2) Scenic Quality

As discussed previously, the Project Site is located in the City of Los Angeles, which meets the definition of an urbanized area.[14] As such, and in accordance with Threshold (c) of State CEQA Guidelines Appendix G, the analysis focuses on whether the Project would conflict with zoning and other regulations governing scenic quality. The determination of conflicts with applicable regulations governing scenic quality is based on a description of Project characteristics (and similarities with existing development) and review of the previously identified applicable City plans and regulations pertaining to scenic quality. These include the City's General Plan (including the Framework Element, the Conservation Element and the Community Plan), the LAMC, and the Citywide Design Guidelines.

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

(3) Light and Glare

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient conditions on the Project Site and vicinity. The analysis describes the Project's proposed light and glare sources and evaluates the extent to which Project lighting may spill off the Project Site onto off-site light-sensitive uses. The

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

analysis also considers the potential for reflected sunlight from building surfaces (glare) and the extent to which such glare would interfere with the operation of a motor vehicle or other activities.

(4) Shade and Shadow

The shade and shadow analysis was completed based on shading models of existing and proposed conditions in the Project vicinity. The increase in shadows over existing conditions was evaluated to determine whether the Project would shade public gathering spaces for more than 90 minutes between the hours of 10:00 A.M. and 2:00 P.M. during the winter solstice.

c. Project Design Features

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

(1) Construction

Project Design Feature AES-PDF-1: Construction fencing will be installed around construction sites that are visible from adjacent public streets and the Los Angeles State Historic Park. Any graffiti that may appear on this construction fencing will be removed on a regular basis.

Project Design Feature AES-PDF-2: Outdoor lighting will be directed away from nearby residential properties, the public right-of-way, and the Los Angeles State Historic Park. However, construction lighting will not be so limited as to compromise the safety of construction workers.

(2) Operation

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

Project Design Feature AES-PDF-4: The Project will use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight.

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

As discussed in Section 2.b, Existing Conditions, above, the Project Site is visible from numerous public locations surrounding the Project Site, including from within the Los Angeles State Historic Park. Views of the Project Site from areas within Elysian Park are also available to the north of the Project Site, and the degree of visibility is dependent on the intervening topography, mature trees, and intervening structures. The analysis below addresses the representative public view locations within the Project vicinity to determine whether the Project would substantially obstruct scenic views of visual resources (e.g., visual resources in the Project vicinity include Elysian Park, the Los Angeles State Historic Park, the Downtown Los Angeles skyline, mature trees, and historical resources) in the Project vicinity. Figure IV.A-2 through Figure IV.A-11 on pages IV.A-15 through IV.A-26, respectively, include visual simulations that show the public views of the Project from each of the 10 representative viewpoints where the Project Site is visible. These views with implementation of the Project are described below.

- Viewpoint 1 (Lookout Drive): As shown in Figure IV.A-2 on page IV.A-15, the upper floors of proposed Buildings 1 and 2 within the South Parcel would be visible. Views of the distant hills would remain in the background, and the foreground would continue to be comprised of a variety of building types, mature trees, and SR-110.

- Viewpoint 2 (Spring Street—South): As shown in Figure IV.A-3 on page IV.A-16, the upper floors of proposed Buildings 1 and 2 within the South Parcel would be visible in the midground. Views of the Elysian Hills on the right and the Downtown Los Angeles skyline in the background on the left would continue to be available. The foreground would continue to be comprised of views of North Spring Street and the Los Angeles State Historic Park.

- Viewpoint 3 (Spring Street—North): As shown in Figure IV.A-4 on page IV.A-17, the proposed North Building and Courtyard Building, as well as portions of the Retail Block Building, within the North Parcel would be visible. The Rose Hills neighborhood would continue to be visible in the background on the right, and the Elysian Hills would continue to be visible above the Courtyard Building and the Retail Block Building and within the center and left of the view. North Spring Street and the Los Angeles State Historic Park would continue to comprise the foreground.

- Viewpoint 4 (Los Angeles State Historic Park—1): As shown in Figure IV.A-5 on page IV.A-19, proposed Buildings 1 and 2 and the podium between the two buildings within the South Parcel would serve as the backdrop to the Los Angeles State Park, and the upper floors of Buildings 1 and 2 would contribute to the Downtown Los Angeles skyline in the background. The expansive open space within Los Angeles

State Historic Park would continue to comprise the midground and foreground of the view.

- Viewpoint 5 (Los Angeles State Historic Park—2): As shown in Figure IV.A-6 on page IV.A-20, the North Building, Courtyard Building, and Retail Block Building within the North Parcel would be integrated within the slope along North Broadway. The distant Rose Hills neighborhood would continue to be visible in the background on the right, and Elysian Park, the Metro rail tracks, and structures along North Broadway would continue to be visible in the midground. The view of the Buena Vista Street Viaduct (now called the North Broadway Bridge) would continue to be visible from the Los Angeles State Historic Park. In addition, the Los Angeles State Historic Park would continue to comprise the foreground. Intervening vegetation obstructs the view of the lower levels of the proposed buildings from this viewpoint.

- Viewpoint 6 (Radio Hill Gardens within Elysian Park): As shown in Figure IV.A-7 on page IV.A-21, proposed Buildings 1 and 2 within the South Parcel would be consistent with other building heights in the greater Project area, including the Metro headquarters building and the numerous high-rise buildings within downtown Los Angeles. The Los Angeles State Historic Park and buildings along North Broadway would continue to comprise the midground, and vegetation within Elysian Park would continue to be visible in the foreground.

- Viewpoint 7 (Park Row Drive): As shown in Figure IV.A-8 on page IV.A-22, Buildings 1 and 2 within the South Parcel would be consistent with other building heights in the greater Project area, as discussed above. The Project buildings would be visible in the midground and the Downtown Los Angeles skyline would continue to be visible in the background. The Los Angeles State Historic Park, Elysian Park, and multi-family residential uses would continue to comprise the foreground.

- Viewpoint 8 (Solano Avenue): As shown in Figure IV.A-9 on page IV.A-23, portions of the Retail Block Building (on the right) and the Courtyard Building (on the left) would be visible from this viewpoint. These proposed buildings at this location would be compatible with the existing building heights along North Broadway. Industrial uses south of the Los Angeles State Historic Park would be partially visible in the background. Due to topography, the Los Angeles State Historic Park would continue to not visible from this viewpoint.

- Viewpoint 9 (Bishops Road): As shown in Figure IV.A-10 on page IV.A-24, Project buildings are not visible from the view location. In addition, due to topography, only a portion of the Los Angeles State Historic Park is visible from this viewpoint. The two large billboard signs would remain.

- Viewpoint 10 (Cottage Home Street): As shown in Figure IV.A-11 on page IV.A-26, the articulated façade and stepbacks of the proposed North Building in the northern portion of the North Parcel would provide a building design that would activate the pedestrian environment and be compatible with existing buildings along North Broadway. In addition, the ground floor of the North Building would be designed

such that portions of the Los Angeles State Historic Park would be partially visible from North Broadway.

As demonstrated by the figures above, the Project has been designed such that views of visual resources would continue to be visible the Project vicinity. In particular, the Project includes varied building heights, landscaped open space areas, and view corridors through the Project Site that provide for continued views of Elysian Park, the Los Angeles State Historic Park, the Downtown Los Angeles skyline, and mature trees. Specifically, Building 1 has been located along the edge of the South Parcel to blend into the background of the southern Downtown view corridor by placing more density closer to the North Spring Street transit hub to maintain existing viewsheds from the north. The North Building has been located along the edge of the North Parcel to maintain view corridors from the Solano Canyon residential neighborhood. As such, overall, the Project would not substantially reduce or block existing views of visual resources in the Project vicinity, including views of Elysian Park, the Los Angeles Historic State Park, and the Downtown Los Angeles skyline.

In addition, as demonstrated by the graphics provided above and within Section II, Project Description of this Draft EIR, the Project would result in positive changes in the visual appearance of the Project Site and would be visible to varying degrees from the scenic viewpoints in the vicinity of the Project Site. The majority of the Project Site lacks natural vegetation, and the Project would enhance the existing environment with new trees and vegetation to be planted. In addition, the location of the publicly accessible promenade at the South Parcel is intended to maximize views of both the Downtown Los Angeles skyline and the Los Angeles State Historical Park.

With regard to public views during construction, construction activities would be visible from off-site locations. During construction, the Project would implement Project Design Feature AES-PDF-1, which requires construction fencing to be installed around construction sites. Impacts on scenic vistas during construction would be less than significant as construction activities would be short-term; construction fencing would be placed on the perimeter of the Project Site; and the site appearance would be typical of construction sites in urban areas.

Based on the above, potential impacts associated with scenic vistas would be less than significant.

(2) Mitigation Measures

Project-level impacts related to scenic vistas would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to scenic vistas would be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

As discussed above, the Project Site is not located within the viewshed of a designated State scenic highway. Thus, no Project impacts associated with damage to scenic resources within a State scenic highway would occur, and no further analysis of Threshold (b) is required.

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

(1) Impact Analysis

(a) Overview of Project Components Related to Scenic Quality

The Project would transform the primarily undeveloped Project Site into a modernized development providing a mix of high-quality residential and commercial uses with public and private open space amenities and landscaping. The Project Site would increase pedestrian activity along North Broadway through a combination of activating ground floor commercial uses, such as retail and restaurant uses, seven live-work units, promenades, public open space amenities, and landscape improvements, as shown in Figure IV.A-12 through Figure IV.A-14 on pages IV.A-36 and IV.A-38. All ground floor uses would be designed to maximize the visual connection to the street by providing floor to ceiling windows with non-reflective glass coatings. The buildings would be designed with the intent to create passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of Downtown Los Angeles, as well as Los Angeles State Historic Park and the neighboring built environment. Outdoor ground-level hardscape areas and planted areas, including promenades, seating areas, courtyards, and plazas, would be publicly accessible and promote pedestrian activation and walkability at the street level. An abundance of shade trees, overhangs, and landscaped trellis areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale.

The proposed architecture reflects the mixed-use character of the area by utilizing cast in place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project, while differentiating individual buildings. Building massing and scale would provide vertical and horizontal plane changes along the façades of



Figure IV.A-12
Conceptual Rendering of the View along North Broadway Looking Southwest Toward the South Parcel and the Downtown Los Angeles Skyline

Source: RIOS, 2025.



Figure IV.A-13

Conceptual Rendering of the View along North Broadway Looking South Toward the Southern Portion of the North Parcel, the South Parcel, and the Downtown Los Angeles Skyline

Source: RIOS, 2025.



Figure IV.A-14
Conceptual Rendering of the View along North Broadway
Looking Southeast Toward and Through Building 2

Source: RIOS, 2025.

the buildings and provide a strong visual connection between the North Parcel and the South Parcel.

The South Parcel would include a six-story podium constructed above a partially subterranean parking garage to connect Building 1, a 26-story building up to 343 feet 8 inches in height, and Building 2, a 22-story building up to 301 feet in height. Restaurant and retail uses, such as a café and outdoor dining areas, would be located on the ground floor of the podium structure and Building 2 along North Broadway. The South Parcel would also include new promenades and walkways increasing accessibility to the Metro A Line Chinatown Station from North Broadway, as shown in Figure IV.A-15 on page IV.A-40 and in Figure II-15 within Section II, Project Description of this Draft EIR.

All parking garage levels on the South Parcel are situated below the elevation of North Broadway. Access is provided via a vehicular curb cut along North Broadway, leading to a sloped driveway on the property that descends to entries at each of the three parking levels. As shown in Figure II-5 in Section II, Project Description of this Draft EIR, the southeastern-facing portions of the parking structure would be enclosed within a solid exterior wall at Level P-3, while vine plantings on a landscaped screen wall, along with a 3.5-foot tall concrete wall, would partially enclose the southeastern-facing portions of Levels P-1 and P-2. Due to changes in the existing grade elevations from the elevation of North Broadway to the elevation at-grade level near the Metro A Line tracks, all parking levels would be above grade when viewing the South Parcel from the Los Angeles State Historic Park. However, as the Metro A Line tracks and their supporting structure gradually rise in elevation above the park, they would partially obscure direct views of a portion of the parking garage behind them as they ascend.

The North Parcel would include a two-story podium connecting the North Building, a 15-story building up to 209 feet 4 inches, and the Courtyard Building, a six-story building up to 108 feet 8 inches in height. Additionally, the North Parcel would also include the Retail Block Building, a three-story building up to 72 feet 4 inches in height. Located within the Retail Block Building would be, commercial uses interspersed with open space, including, but not limited to, public shopping gardens, garden dining terraces, and garden plazas, which would create an environment that attracts pedestrians and visitors to the Project Site, and thereby increases pedestrian activity along North Broadway. The North Parcel would also include seating areas throughout the Parcel, overlook areas along the southern boundary with views of the Los Angeles State Historic Park, and meditation gardens in the central portion of the Parcel. The parking garages on Levels P-1 and P-2 would be located interior to the buildings and built into the slope of the North Parcel. Additionally, an 11-foot exterior concrete wall, located adjacent to the Metro A Line tracks, would serve as a base of the buildings, as well as screen Level P-3 of the parking garage from Los Angeles State Historic Park.

With regard to open space, the Project would include a total of approximately 132,949 square feet of open space within the Project Site, of which 45,377 square feet would be publicly



Figure IV.A-15
Rendering of South Parcel and Metro A Line
from North Broadway Looking Southwest

Source: RIOS, 2025.

accessible but privately operated and maintained. Further, the Project would include approximately 84,872 square feet of residential common open space, which would be accessible to the residents, and 2,700 square feet of private open space, which would consist of private residential balconies. As part of these open space improvements, a Central Greenspace would be constructed in the central portion of the Project Site connecting the North Parcel and the South Parcel. The narrow open space area would link the North Parcel and South Parcel, and would be landscaped with native trees and understory vegetation. While the sloped area of the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would be adjacent to the continuous sidewalk for pedestrians along Broadway, which would also be lined with new street trees. The Project would remove 20 existing on-site trees and three street trees and would provide approximately 322 new trees, including 110 street trees and 212 on-site trees.

Architectural lighting is proposed to complement key architectural features of each building through the use of low profile, low wattage light-emitting diode (LED) building-mounted fixtures and fixtures integrated into the building façades. Low intensity LED luminaires, pedestrian poles, decorative lanterns, lighted bollards, and recessed step lights would also be used. All exterior lighting would be designed to meet minimum light levels for emergency egress and to comply with the requirements of Title 24, including those of the CALGreen Code.

Signage would be located at a height and of size that is visible to pedestrians and that facilitates access to the building entrances. Additionally, four billboards would remain on the North Parcel. A wayfinding signage system would be located along the public walkways through the Project Site, which would facilitate pedestrian passage through the Project Site to and from the Metro A Line Chinatown Station.

Overall, the Project would enhance the scenic quality of the Project Site and vicinity by providing new trees, improved public spaces and open space areas, improved pedestrian pathways, and a compatible high-quality building design.

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

As discussed previously, a number of existing City plans and regulations governing scenic quality are applicable to the Project, including the City's General Plan (i.e., the Framework Element, Conservation Element, Mobility Plan, and the Community Plan), the LAMC, and the Citywide Design Guidelines. Whether the Project would conflict with the applicable scenic quality-related goals, objectives, policies, and requirements of these plans; requirements of the LAMC; and the provisions of the Citywide Design Guidelines is evaluated below.

Note that during construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of existing buildings and surface parking lots and grading and construction activities. During construction, the Project would implement Project Design Feature AES-PDF-1, which requires opaque construction fencing to be installed around construction sites that are visible from the adjacent public streets and the Los Angeles State Historic Park to block views of any construction equipment being utilized at the Project Site. The Project would also implement Project Design Feature AES-PDF-2, which requires that outdoor lighting during construction be directed away from adjacent residential properties, the public right-of-way, and the Los Angeles State Historic Park. As such, construction activities would not substantially alter or degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements, such as lighting, that detract from the visual character of the surrounding area since construction activities would be short-term; construction fencing would be placed on the perimeter of the Project Site to block views of construction equipment; and the site appearance would be typical of construction sites in urban areas. As such, temporary construction activities would not conflict with applicable zoning and other regulations related to scenic quality.

(i) General Plan Framework Element

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

Land Use Chapter

The Project's potential to conflict with the applicable goals, policies, and objectives of the Land Use Chapter is discussed in detail in Section IV.I, Land Use and Planning, of this Draft EIR and in Table 2 of Appendix H. With regard to consistency with goals, policies, and objectives related to scenic quality, as discussed in Table 2 of Appendix H, the Project would promote Policy 3.2.1 regarding distinct patterns of development and Policy 3.15.3 regarding density adjacent to transit and within a Regional Center, by introducing a high-density, mixed-use, transit- and pedestrian-oriented development in proximity to off-site services, shopping, amenities, and transit. The Project would also not conflict with Policies 3.2.4 and 3.14.4 regarding scale and character of residential neighbors as it would develop buildings with a design that is intended to respect the scale of nearby residential neighborhoods. In particular, the massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and an abundance of public open space areas along with landscaping and pedestrian paths. The Project would support Policy 3.10.4 regarding streetscape improvements through the provision of the Central Greenspace that would connect the North Parcel and the South Parcel, as well as the planting of 110 new street trees. In addition the Project would support Policy 3.10.5 regarding pedestrian amenities by providing pedestrian oriented plazas and other open space areas. With regard to Policy 3.15.4 regarding promotion

of pedestrian activity, the Project would support this policy through the provision of promenades, public open space amenities, and landscape improvements.

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

Urban Form and Neighborhood Design Chapter

As discussed in Table 2 in Appendix H of this Draft EIR, the Project would not conflict with the applicable goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project and would contribute to the overall livability of the City. Specifically, the Project would support Goal 5A and Objective 5.2, which encourage design that provides for interconnected neighborhoods and future development in centers and in nodes along corridors that are served by transit. The proposed uses would be also compatible with the other residential and commercial developments located in the general vicinity of the Project Site.

The Project would also support Objective 5.8 regarding establishing a strong pedestrian orientation and Objective 5.5 regarding creating pedestrian access and enhancements and promoting the livability of all neighborhoods by upgrading the quality of development and improving the quality of the aesthetics and visual appearance of the Project Site. Specifically, as discussed above, the design of the Project would provide outdoor ground-level hardscape areas and planted areas, including promenades, seating areas, courtyards, and plazas, which would be publicly accessible. The Project would also upgrade the quality of development at the Project Site with a new mixed-use development that would include new residential and commercial uses.

The Project also supports Policy 5.8.4 regarding signage that is integrated with the architectural character of the buildings and conveys a visually attractive character. As discussed above, signage would be located at a height and of size that is visible to pedestrians and that facilitates access to the building entrances. Additionally, one existing double-sided billboard would remain on the South Parcel and two existing single sided billboards would remain on the North Parcel. A wayfinding signage system would be located along the public walkways through the Project Site, which would facilitate pedestrian passage through the Project Site to and from the Metro A Line Chinatown Station. Signage would be integrated into the architectural character of the buildings; therefore, the Project would not conflict with this policy.

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

Open Space and Conservation Chapter

As discussed in detail in Table 2 of Appendix H, the Open Space and Conservation Chapter addresses providing open space (Policies 6.4.8a and 6.4.9), integrating public and private open space (Goal 6A), and providing connections to the existing regional and community open space system (Objective 6.2). In support of the these goals and policies, the Project would include a total of approximately 132,949 square feet of open space within the Project Site of which approximately 45,377 square feet would be publicly accessible, privately operated and maintained. The publicly accessible open space would be comprised of public shopping gardens, public garden plaza and kiosks, promenades, and associated raised planters and seating. In addition, the Central Greenspace, would be constructed in the central portion of the Project Site connecting the North Parcel and the South Parcel. The narrow open space area would link the North Parcel and South Parcel, and would be landscaped with native trees and understory vegetation. While the sloped area of the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would be adjacent to the continuous sidewalk for pedestrians along Broadway, which would also be lined with new street trees. Furthermore, the Project would provide a new pedestrian access through the South Parcel that would provide access from North Broadway to North Spring Street adjacent to the Los Angeles State Historic Park and the Metro A Line Chinatown Station. This connection to the Metro A Line Chinatown Station would also provide improved access to Elysian Park located to the north of the Project Site, allowing pedestrians more opportunity to interact with new and existing greenspaces. In addition, overall, the Project would provide 322 new trees (110 street trees and 212 on-site), consisting of coast live oak (*Quercus agrifolia*) street trees, and on-site trees, including, but not limited to, desert willow tree (*Chilopsis linearis*), peppermint tree (*Agonis flexlosa*), and strawberry tree (*Arbutus unedo*). All proposed plant and tree species would be drought resistant and require low water use.

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

(ii) General Plan Conservation Element

As discussed in detail in Table 2 of Appendix H, the Project would not conflict with the City's goal to preserve, protect, and enhance its existing natural resources that contribute to aesthetic quality. The Conservation Element's scenic quality objective and policy focus on the protection and reinforcement of natural and scenic vistas as irreplaceable resources, including landforms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (e.g., historical resources, oceans, mountains, and unique natural features), for the aesthetic enjoyment of present and future generations. As discussed above, the Project Site contains a sloped area with limited vegetation that is not a unique natural feature. In addition, the Project Site does not contain any unique scenic features visible from public areas. As discussed in

Section IV.C, Cultural Resources of this Draft EIR, a portion of the Zanja Madre has been identified in the southern portion of the Project. However, the portions of the Zanja Madre are generally not visible from public areas, and the Project would promote the history of the Zanja Madre and would not result in significant impacts to this cultural resource.

As discussed above, SR-110 is a designated Historic Parkway that is located between 0.13 and 0.35 miles to the northwest of the Project Site depending upon the specific location within the Project Site. The Project would not include any physical improvements that would affect this historical resource. In addition, due to topography, mature landscaping, and intervening structures, the proposed buildings would not change the historic setting of the Arroyo Seco Parkway or access to views of the Arroyo Seco Parkway.

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

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

As discussed above, the Mobility Plan identifies Stadium Way from SR-110 to I-5, winding through Elysian Park, as a Scenic Collector Highway. Scenic highways depicted in the City have special controls for protection and enhancement of scenic resources. Due to distance, the Project Site is not subject to these controls. In addition, the primary visual resources along Stadium Way are associated with Elysian Park with its vast open space areas that include mature trees and other vegetation that would not be affected by the Project. Views of the Project Site from Stadium Way are limited by distance, topography, and mature trees.

Based on the above, the Project would not conflict with the applicable goals, objectives, and policies related to scenic quality set forth in the Mobility Plan 2035.

(iv) Central City North Community Plan

An analysis of whether the Project would conflict with the applicable scenic quality-related goals, objectives, and policies of the Community Plan is included in Table 4 of Appendix H. These goals, objectives, and policies address quality design that is compatible with existing uses, aesthetics of parking areas, landscaped corridors, and the creation and preservation of open space. As discussed therein, the Project would support Policies 1-1.2, 1-3.1, 2-1.4, and 2-4.1 regarding community appearance, high quality design and compatible development, by providing a high-quality building design that includes public open space amenities and landscaping that would complement the surrounding areas. In addition, the Project would support policies related to enhancing the streetscape and appearance of areas (Policies 2-2.2 and 2-2.3) through activating the streetscape along North Broadway with commercial uses and landscaping and providing public open space areas, including garden plazas.

As discussed above, the Community Plan's General Plan Land Use Map also designates portions of SR-110 and Stadium Way farther to the northwest as Scenic Freeways and a Scenic Collector Highway, respectively. Due to distance, topography, and intervening buildings, the Project would not substantially alter the visual resources along these scenic highways. In particular, the primary visual resources along Stadium Way are associated with Elysian Park with its vast open space areas that include mature trees and other vegetation. In addition, the visual resources along SR-110 include the historic freeway infrastructure along with adjacent mature landscaping and open space areas within Elysian Park. Furthermore, views of the Project Site from these scenic highways are limited by distance, topography, and mature trees.

The Community Plan also includes specific design policies for individual projects; these policies are addressed in Table IV.A-1 on page IV.A-47. As demonstrated therein, the Project would not conflict with and would generally support the applicable design policies for individual projects.

Based on the above, the Project would not conflict with the applicable scenic quality-related goals, objectives, and policies of the Community Plan.

(v) Los Angeles Municipal Code

Section IV.I, Land Use and Planning, of this Draft EIR, provides a detailed discussion of the Project's potential to conflict with the LAMC. This discussion focuses on LAMC requirements related to aesthetics, including open space, landscaping, and lighting.

LAMC Section 12.21 G requires open space for new developments with six or more dwelling units. Per LAMC Section 12.21 G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. The Project is required to provide a total of 110,775 square feet of open space. As previously discussed, the Project would provide approximately 132,949 square feet of open space (approximately 45,377 square feet of publicly accessible open space, approximately 84,872 square feet of residential common open space, and 2,700 square feet of private open space). As such, the Project would exceed the applicable open space requirements set forth by the LAMC.

Landscaping would be provided in conformance with applicable LAMC Section 12.21 G.2(a)(3), which requires one 24-inch box tree for every four dwelling units proposed on site. Overall, the Project would provide 322 new trees (110 street trees and 212 on-site), consisting of coast live oak street trees, and on-site trees, including, but not limited to, desert willow, peppermint tree, and strawberry tree.

Table IV.A-1
Project Consistency with the Community Plan as Related to the Design Policies for Individual Projects

Applicable Design Policy	Would the Project Conflict?
A. Commercial 1. Site Planning—Structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/ vehicular conflicts.	**No Conflict.** The Project would incorporate commercial uses along North Broadway. In particular, restaurant and retail uses, such as a café and outdoor dining areas, would be located on the ground floor of the podium structure and Building 2 along North Broadway. Additionally, public open space areas, including garden plazas and terraces, a small outdoor amphitheater, amenity gardens, seating areas, meditation spaces, and a water feature, would serve as open space for the residents and visitors that increases pedestrian activity through landscaping and open spaces integrated throughout the Project Site. The South Parcel would also include new promenades and walkways increasing accessibility to the Metro A Line Chinatown Station from North Broadway. In addition, located within the Retail Block Building and the podium, commercial uses and open space, including public shopping gardens, garden dining terraces, and garden plazas, would create an environment that would attract pedestrians and visitors to the Project Site to increase pedestrian activity along North Broadway. With regard to pedestrian access, the Project would provide a 3-foot dedication on North Broadway to widen the pedestrian sidewalk. All driveways would be designed to provide an adequate pedestrian refuge area between the driveways where necessary. Thus, the Project would improve the pedestrian environment.
2. Height and Building Design: The mass, proportion and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest, and enhance the streetscape by providing continuity and avoiding opportunities for graffiti. Building materials shall be employed to provide relief to bland untreated portions of exterior building façades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character. Accordingly, the following policies are proposed: a. Requiring the use of articulations, recesses, surface perforations, and porticoes to break up long, flat building facades;	**No Conflict.** The Project Site spans approximately 0.6 miles along the southeast side of the North Broadway street frontage and would increase pedestrian activity through a combination of activating ground floor commercial uses, including promenades, public open space amenities, and landscape improvements. All ground floor uses would be designed to maximize the visual connection to the street by providing floor to ceiling windows with non-reflective glass coatings. The buildings would be designed with the intent to create passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of the Downtown Los Angeles skyline, as well as Los Angeles State Historic Park and the neighboring built environment. The proposed architecture reflects the industrial mixed-use character of the area by utilizing cast in place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project, while differentiating individual buildings. Building massing and

Table IV.A-1 (Continued)
Project Consistency with the Community Plan

Applicable Design Policy	Would the Project Conflict?
b. Providing accenting, complimentary building materials to building facades; c. Maximizing the applications of architectural features or articulations to building facades; d. Designating architecturally untreated facades for signage; e. Screening of mechanical and electrical equipment from public view; f. Requiring the enclosure of trash areas for all projects; g. Requiring freestanding walls to use articulation, recesses, surface perforations, porticoes to break up long freestanding walls.	scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North Parcel and the South Parcel. A range of building heights would be provided that would reflect the diversity of building heights within the general Project vicinity. Mechanical equipment would be screened from public view, and trash areas would be enclosed. In addition, exterior walls would be articulated and, in some cases, would incorporate vine plantings.
3. Parking Structures: Parking structures shall be integrated with the design of the building they serve through: a. Designing parking structure exteriors to match the style, materials and colors of the main building; b. Maximizing commercial uses, if appropriate, on the ground floor; c. Landscaping to screen parking structures not architecturally integrated with the main building; d. Utilizing decorative walls and landscaping to buffer residential uses from parking structures.	**No Conflict.** All parking garage levels on the South Parcel would be located below the elevation of North Broadway where the property fronts North Broadway at Building 2. Along the southwestern edge of the podium and Building 1, portions of Level P-1 would be partially above the elevation of North Broadway, as North Broadway has a declining slope in elevation toward the southwest; however, the parking garage would not be visible from North Broadway due to intervening buildings of Mandarin Plaza. The southeastern-facing portions of the parking structure would be enclosed within a solid exterior wall at Level P-3, while vine plantings on a landscaped screen wall, along with a 3.5-foot tall concrete wall, would partially enclose the southeastern-facing portions of Levels P-1 and P-2. Within the North Parcel, the parking garages on Levels P-1 and P-2 would be located interior to the buildings and built into the slope on the North Parcel. Additionally, an 11-foot exterior concrete wall, located adjacent to the Metro A Line tracks, would serve as a base of the buildings, as well as screen Level P-3 of the parking garage from Los Angeles State Historic Park.
5. Light and Glare: 1. Installing on-site lighting along all pedestrian walkways and vehicular access ways. 2. Shielding and directing of on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	**No Conflict.** The Project would install on-site lighting along all pedestrian walkways and vehicular access ways. In addition, lighting would be directed on-site, away from nearby residential uses.

Table IV.A-1 (Continued)
Project Consistency with the Community Plan

Applicable Design Policy	Would the Project Conflict?
C. Multiple Residential 1. Site Planning All multi-family residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents and the following goals are proposed: a. Requiring useable open space for outdoor activities, especially for children.	**No Conflict.** The Project would include numerous plazas and courtyards that would serve as focal points with residential amenities and usable open space. The Project would include a total of approximately 132,949 square feet of open space within the Project Site, of which approximately 45,377 square feet would be publicly accessible but, privately operated and maintained. Further, the Project would include approximately 84,872 square feet of residential common open space, which would be accessible to the residents, and 2,700 square feet of private open space, which would consist of private residential balconies. Publicly accessible open space would be comprised of outdoor fitness areas, such as the hill climb area, courtyards, promenades, seating areas, a small terraced amphitheater seating area, public shopping gardens, and a public garden plaza and kiosks.
C. Multiple Residential 2. Design The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety and monotonous repetition. Achievement of this can be accomplished through: a. Requiring the use of articulation, recess, or perforations of surfaces to break up long, flat building facades; b. Utilizing of complementary building materials in building facades; c. Integrating building fixtures, awnings, security gates, etc. into the design of a building; d. Screening all rooftop equipment and building appurtenances from adjacent properties.	**No Conflict.** Refer to Policy 2 under Commercial, above.
3. Parking Structures Parking structures shall be integrated with the design of the buildings they serve.	**No Conflict.** Refer to Policy 3 under Commercial, above.

[a] *Central City North Community Plan, last Update adopted on December 15, 2000.*

Source: Eyestone Environmental, 2025.

With regard to lighting, the Project would also comply with LAMC Section 12.21 A.5(k) regarding lighting for parking areas; LAMC Section 14.4.4 E limiting lighting from signage to 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property; LAMC Section 17.08 C regarding street lighting; and Section 93.0117(b) limiting lighting to 2 foot-candles (21.5 lx) at a residential use.

Based on the above, the Project would not conflict with the LAMC requirements related to scenic quality, including those regarding open space, landscaping, and lighting.

(vi) Citywide Design Guidelines

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

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

The Project would provide 110 new street trees along the frontages of the Project Site, consisting of coast live oak street trees, which would enhance the streetscape and improve the pedestrian experience. The Project would also include a Central Greenspace in the central portion of the Project Site connecting the North Parcel and the South Parcel. The narrow open space area would link the North Parcel and South Parcel, and would be landscaped with native trees and understory vegetation. While the sloped area of the Central Greenspace would be inaccessible to pedestrians due to steep southeast facing slopes, the Central Greenspace would be adjacent to the continuous sidewalk for pedestrians along Broadway, which would also be lined with new street trees. On the South Parcel, restaurant and retail uses, such as a café and outdoor dining areas, would be located on the ground floor of the podium structure and Building 2 along North Broadway. Additionally, public open space areas, including garden plazas and terraces, a small outdoor amphitheater, amenity gardens, seating areas, meditation spaces, and a water feature, would serve as open space for the residents and visitors that increases pedestrian activity. On the North Parcel, located within the Retail Block Building and podium, commercial uses and open space, including public shopping gardens, garden dining terraces, and garden plazas, would create an environment that would attract pedestrians and visitors to the Project Site. The North Parcel would also include seating areas, overlook areas along the southern boundary with views of the Los Angeles State Historic Park, and meditation gardens. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale. Therefore, the Project would not conflict with Citywide Design Guideline 3.

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

The Project Site is located within an urbanized area and is surrounded by various residential, commercial, retail, restaurant, office, warehouse, and industrial uses. The Project would introduce uses similar to and compatible with the mix of land uses surrounding the Project Site and would incorporate design elements that would enhance the quality of the visual environment and complement its surroundings. Specifically, the Project would transform a primarily undeveloped Project Site into a modernized development providing a mix of high-quality residential and commercial uses with public and private open space amenities and landscaping. The buildings would be designed with passive and active open space areas for both residents and visitors to utilize throughout the Project Site and to take advantage of the views of the Downtown Los Angeles skyline, as well as Los Angeles State Historic Park and the neighboring built environment. The proposed architecture would reflect the industrial character of the area by utilizing cast-in-place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North Parcel and the South Parcel. A range of building heights would be provided that would reflect the diversity of building heights within the general Project vicinity. Overall, the proposed development would be compatible with the general urban characteristics of the surrounding neighborhood. Therefore, the Project would not conflict with Citywide Design Guideline 4.

Guideline 5: Express a clear and coherent architectural idea.

The proposed architecture reflects the industrial character of the area by utilizing cast-in-place place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project, while differentiating individual buildings. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North Parcel and the South Parcel. All of these elements would complement the overall design of the Project Site, creating a coherent architectural idea. Therefore, the Project would not conflict with Citywide Design Guideline 5.

Guideline 6: Provide Amenities That Support Community Building and Provide an Inviting Comfortable User Experience.

As previously discussed, the Project would include a total of approximately 132,949 square feet of open space within the Project Site, of which approximately 45,377 square feet would be publicly accessible but privately operated and maintained. On the South Parcel, the ground level outdoor open space would be comprised of outdoor fitness areas, such as the hill climb area, courtyards, promenades, seating areas, and a small terraced amphitheater seating

area. On the North Parcel, the ground level outdoor open space would be comprised of a garden dining terrace, public shopping gardens, public garden plaza, landscape trellis, promenades, and associated raised planters and seating. The Project would provide 110 new street trees along the frontages of the Project Site, consisting of coast live oak street trees, which would enhance the streetscape and improve the pedestrian experience. Furthermore, an abundance of shade trees, overhangs, and landscaped trellis areas would be integrated throughout the Project Site to provide respite shade areas and create a pedestrian scale. The Project would also increase pedestrian activity through a combination of ground floor uses, promenades, public open space amenities, and landscape improvements. In addition, the Project would provide 322 new trees as discussed above. Therefore, the Project would not conflict with Citywide Design Guideline 6.

(vii) Conclusion

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

Lighting during Project construction can have the potential to generate light spillover to off-site sensitive land uses. Under the Project, construction activities would occur in accordance with the provisions of the LAMC Section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. While the majority of Project construction would occur during daylight hours, there is a potential,

based on the Project's anticipated construction hours, that construction could occur in the evening hours and require the use of artificial lighting. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction in a given area of the Project Site. In addition, all stationary construction lighting would comply with the requirements set forth in the CALGreen Code described above. Furthermore, in accordance with Project Design Feature AES-PDF-2, above, construction lighting, including lighting that may be necessary during nighttime mat pour activities, would be directed away from residential properties located to the north of the Project Site across North Broadway, the public right-of-way, and the Los Angeles State Historic Park. In addition, Project Design Feature AES-PDF-1, above, provides for the erection of a fence along the Project Site perimeter, which would block light from construction activities. Therefore, light resulting from construction activities would not create a new source of substantial light to adversely affect nighttime views in the area.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations, where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as set forth in Project Design Feature AES-PDF-1, temporary construction fencing would be placed along the periphery of the Project Site, where construction activities would occur to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above analysis, construction of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant.

(b) Operation

The Project would replace the existing on-site structures and parking areas with new buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare from vehicles that currently park on the existing surface parking lot within the South Parcel. Specifically, at each parking level at both Parcels there would be a continuous solid barrier that would block visibility of the headlights from Los Angeles Historic State Park consistent with LAMC requirements. New sources of artificial lighting that would be introduced by the Project would include low-level interior lighting visible through the windows of the buildings; signage lighting; architectural

lighting on the buildings, including lighting associated with podium uses and activities; low-level security and wayfinding lighting; and landscape lighting. New sources of glare would include building surfaces and Project-related vehicles.

Project lighting is proposed to complement key architectural features of each building through the use of low profile, low wattage LED building-mounted fixtures and fixtures integrated into the building façades. Low intensity LED luminaires, pedestrian poles, decorative lanterns, lighted bollards, and recessed step lights would also be used. Low glare fixtures and decorative fixtures would be located at the ground level of each building to create a sense of arrival and scale and include the use of building-mounted decorative fixtures, low level landscape lanterns, and floor lamps. The security lighting for the exterior courtyards and pedestrian walkways would include a combination of low intensity LED luminaries, pedestrian poles, decorative lanterns, bollards, and recessed step lights. All exterior lighting would be designed to meet minimum light levels for emergency egress and to comply with the requirements of Title 24, including the CALGreen Code).

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area. All exterior lights would be directed towards the interior of the Project Site to avoid light spillover onto adjacent sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

As described in Section II, Project Description, of this Draft EIR, signage would be located at a height and of size that is visible to pedestrians and that facilitates access to the building entrances. Project signage would include building identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage, Additionally, four billboards would remain on the North Parcel, resulting in a substantial reduction when compared with the 15 billboards under existing conditions. A wayfinding signage system would be located along the public walkways through the Project Site, which would facilitate pedestrian passage through the Project Site to and from the Metro A Line Chinatown Station. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with the LAMC maximum 3 foot-candles of light intensity as measured at the property line of the nearest residentially zoned property located to the north of the Project Site across North Broadway.

With regard to glare, the proposed architecture reflects the industrial mixed-use character of the area by utilizing cast in place concrete walls, structural steel, metal panels,

fiber cement board, and glass/steel guardrails. As provided above in Project Design Feature AES-PDF-4, the Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas would generally be enclosed or screened, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night, and would reduce lighting levels from vehicle headlights during the night compared to existing conditions. While headlights from vehicles entering and exiting the Project's driveways would be visible from the surrounding uses during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact. In addition, all lighting would be required to comply with Chapter 2, Article 3 of the California Vehicle Code (CVC) Division 11, Rules of the Road, which includes limits to the location of light sources that may cause glare and impair the vision of drivers.

Based on the above, lighting and glare associated with Project operation would not result in a new source of substantial light or glare. Light and glare impacts during operation of the Project would be less than significant.

(i) Shading

With regard to shading, the closest public gathering spaces to the Project Site include the Los Angeles State Historic Park to the south, Elysian Park to the north, and Chinatown Central Plaza to the west. Mandarin Plaza is also located to the south of the South Parcel but is already substantially shaded by buildings, overhangs and trellises and thus is not analyzed further. Shading diagrams for the Project are provided in Figure IV.A-16 and Figure IV.A-17 on pages IV.A-56 and IV.A-57. As shown in Figure IV.A-16 and Figure IV.A-17, off-site shading from the Project is associated with the high-rise building on the North Parcel and the two high-rise buildings on the South Parcel.

As shown in Figure IV.A-16, buildings within the South Parcel will not shade any public gathering spaces for more than 90 minutes. In addition, small areas of the Cathedral High School athletic track and an outdoor area of Saint Peter's Catholic Church may be shaded. However, these areas already experience shading from existing buildings, and are not public spaces. As shown in Figure IV.A-16, a small portion of the Los Angeles State Historic Park would be shaded starting at approximately 2:00 P.M. and, therefore, would not exceed the 90-minute timeframe factor outlined in the LA CEQA Thresholds Guide. The buildings within the South Parcel would not cast any shadows on Chinatown Central Plaza.

As shown in Figure IV.A-17, shadows from the North Parcel would also not shade public gathering areas for more than 90 minutes. Specifically, while a small portion of Elysian Park



Figure IV.A-16
Shadows from South Parcel – Winter Solstice

Source: RIOS, 2025.

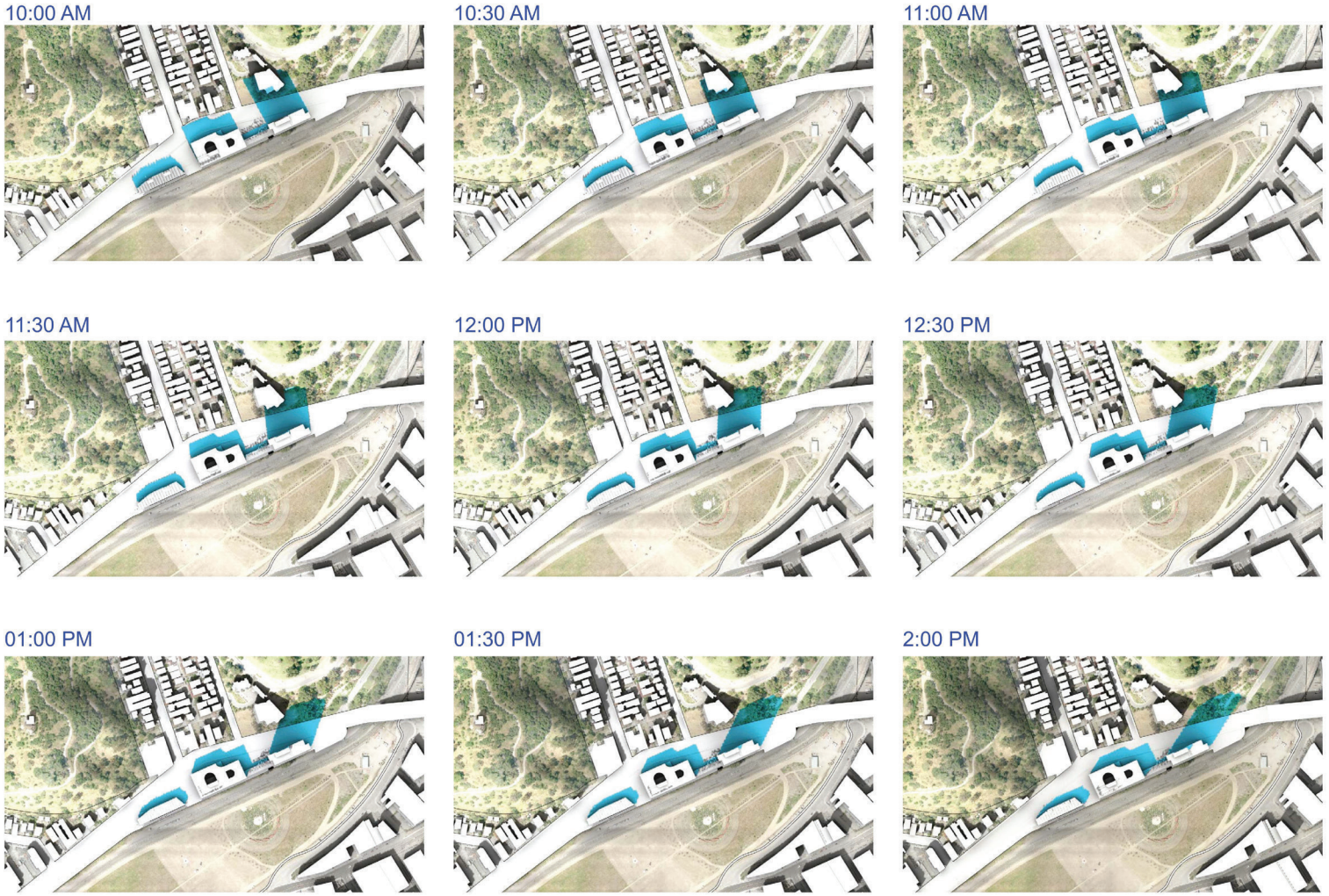

Figure IV.A-17
Shadows from North Parcel – Winter Solstice

Source: RIOS, 2025.

adjacent to North Broadway may be shaded for more than 90 minutes, much of the area is located on a steep vegetated slope that would not be conducive to gathering and this area already includes mature trees at the top which currently shade the area.

Based on the above, the Project would not shade public gathering spaces for more than 90 minutes between the hours of 10:00 A.M. and 2:00 P.M. during the winter solstice. **Impacts would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

Aesthetic impacts associated with the Project would not be considered significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related aesthetics were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, aesthetics impacts do not vary substantially over the course of relatively short time frames (i.e., the 20-year term of the Development Agreement). In addition, in accordance with the Project Design Features presented above, throughout their duration, all construction activities will be screened by fencing, and construction lighting will be directed away from sensitive uses. As such, impacts associated with Project construction would be less than significant. A later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 25 related projects have been identified in the vicinity of the Project Site. These related projects include 23 development projects and two infrastructure improvement projects. The related projects comprise a variety of uses, including residential, commercial, and recreational uses, as well as mixed-use developments incorporating some or all of these uses.

(1) Impact Analysis

(a) Scenic Vistas

As shown in Figure III-1 of Section III, Environmental Setting, of this Draft EIR, the closest related projects include Related Project Nos. 7, 11, 17, and 18 located along North Broadway and Related Project Nos. 5 and 13 to the south of the Project Site. These related projects include residential, commercial, and hotel uses within low to high-rise buildings. As with the Project, these related projects would be visible from public locations that include views of visual resources, such as the Downtown Los Angeles skyline, Elysian Park, and the Los Angeles State Historic Park. However, as with the Project, public views of these visual resources would not be expected to be fully obstructed by any of these related projects. Furthermore, the height and massing of these related projects would be consistent with that anticipated by the City's zoning and land use plans for these related projects. **Therefore, cumulative impacts associated with scenic vistas would be less than significant.**

(b) Scenic Quality

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

(c) Light and Glare

As discussed above, as with the Project, the related projects would be located in an urbanized area where various sources of light are already present. In addition, the related projects would comply with LAMC requirements regarding lighting, which would ensure that sensitive uses would not be impacted by lighting. With regard to glare, the related projects' proposed uses, which include a mix of residential and commercial uses and infrastructure improvements, would be compatible with existing development in the surrounding area, which includes these same uses. The uses and infrastructure improvements proposed by the related projects would not generate substantial sources of glare. Furthermore, related projects would be subject to development review to ensure that significant impacts associated with light and glare would not occur. **Therefore, cumulative light and glare impacts from development of the Project and the related projects would be less than significant.**

(d) Shade and Shadow

As discussed above, the Project would cast limited shadows on the Los Angeles State Historic Park to the south and Elysian Park to the north and no Project shadows would be cast on Chinatown Central Plaza. As shown in Figure III-1 of Section III, Environmental Setting, of this Draft EIR, the closest related projects include Related Project Nos. 7, 11, 17, and 18 located along North Broadway and Related Project Nos. 5 and 13 to the south of the Project Site. Based on their locations and intervening development, none of the related projects are expected to shade Elysian Park. Related Project No. 5 would shade portions of the Los Angeles State Historic Park. Specifically as indicated in the Draft EIR for this Project, the Project's 9:00 A.M. shadow would extend to the northwest across North Spring Street and onto the southeasternmost portion of Los Angeles State Historic Park. However, this shadow would only impact the park for approximately one hour and would not impact the park after noon.[15] In addition, due to its location relative to Related Project No. 5, the Project would not contribute to shadows on Los Angeles State Historic Park at the same time as Related Project No. 5 and, thus, would not result in cumulative shading impacts on the park. **As such, cumulative impacts associated with shading from development of the Project and the related projects would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with respect to scenic vistas, conflicts with applicable zoning and other regulations governing scenic quality, and light and glare (including shading) would be less than significant. Therefore, no mitigation measures are required.

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[15] *College Station Draft Environmental impact Report, Aesthetics Section, accessed February 14, 2025.*

(3) Level of Significance After Mitigation

Cumulative impacts with respect to scenic vistas, conflicts with applicable zoning and other regulations governing scenic quality, and light and glare (including shading) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.